

# Stroud Local Plan

## Examination in Public

**Matter 6a** – Site Allocations – General Questions

Hearing Statement by Savills on behalf of L&Q Estates

February 2023



### **6a.3 Core Policy CP5 sets out environmental development principles for strategic sites?**

- a. In our representations we raised concerns with two specific aspects of the policy - Bullet Point 4 and 'Sustainable Construction Principles'.
- b. Bullet Point 4 requires applicants on strategic allocations to lay the development out in accordance with an indicative masterplan. This matter is addressed in our response to Question 6a.13 below.
- c. The Sustainable Construction Principles as drafted do not provide any threshold or target upon future planning application would be considered, and a judgement made in regard to whether a development sufficiently maximises its contribution to these objectives. We comment elsewhere on viability, but this is material to this policy. The requirements to maximise low/zero carbon energy, minimise emissions and improve energy performance, minimise water consumption etc all pertain to recognisable assessment processes – through which a development proposal can be considered, and compliance confirmed. Indeed, Building Regulations provide numerous mechanisms to assess these both at basic and enhanced standards and it is through the Building Regulations regime where these matters more comfortably sit.
- d. We note however that the inspectors have posed a number of questions in relation to Policy CP5. Having reviewed the draft policy in light of these questions we are not convinced that the policy adds much, if anything, to the Local Plan.
- e. The five core requirements for strategic sites which are listed at the beginning of the policy are nebulous and imprecise. For example, it is very difficult for an applicant or local planning authority to judge whether a proposed development is 'low impact' when there is no definition or threshold test to be satisfied. Furthermore, it would appear that most, if not all, of these requirements are covered with a greater deal of specificity in other policies of the plan. For these reasons we consider the policy could be deleted without any detrimental impact.

### **6a.5 Many of the site allocations propose a mix of development but only the number of dwellings is specified. Where other uses such as employment are also sought, why is the size of that other use (i.e. floorspace or land area) not also specified? How will a decision-maker determine if a future development proposal meets the policy and identified needs, if the requirements are not clearly defined.**

- a. There is merit in providing details of the main land uses in the allocations, however for smaller, ancillary components of larger mixed use schemes such as the local centre, we are content that this is best defined and determined through the planning application process. In that respect, we have no objections to the allocating policy for Whaddon – G2.

### **6a.13 The site allocation policies refer to the production of masterplans and/or development briefs but no further details are set out.**

- a. Bullet Point 4 of Policy CP5 requires applicants on strategic allocations to lay the development out in accordance with an indicative masterplan. The policy doesn't say however who is responsible for producing the indicative masterplan or how (or by whom) it will be approved. Policy G2 for Whaddon already requires the preparation of a Development Brief for the allocation and for this to be approved by the Council. To avoid any confusion or unnecessary additional steps in the route to planning permission, this element of the policy should be deleted.
- b. With regards the production of the 'development brief' in the allocations policies, we agree that the policy lacks clarity in that it fails to explain what is required of a development brief, when it is to be submitted and how it is to be signed off. In the absence of this detail, the risk is that the requirement for a 'development brief' is interpreted as being the equivalent of an SPD – a detailed planning document which is to be prepared and approved by the Council prior to the submission of planning applications. If that was the case there would be a very significant delay to the delivery of development on the allocated site.
- c. Rather than expand further upon our concerns in this regard we thought it would be more helpful to explain how, within certain parameters, 'development briefs' can be used positively to coordinate development on large<sup>1</sup> sites strategic sites. It is our view that:
  - Development briefs should be the responsibility of the landowners / promoters / developers to produce. Local authorities have very limited resources and it would be quicker for the parties involved in the allocation to prepare the development brief amongst themselves.
  - The scope of 'development briefs' should be limited a defined list of high level principles that ensure applications provide a coordinated and coherent approach to development consistent

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<sup>1</sup> We agree that there is no need for smaller, single ownership allocations to prepare such a brief.

with the allocating policy. An example would be access to and between landownerships within an allocation.

- There is no statutory scheme for ‘development briefs’ and no mechanism therefore for them to ‘approved’ by a local planning authority. Whilst there is potential for them to be informally approved, in the event that the LPA did not support and therefore ‘approve’ the ‘development brief’ it is unclear what this would mean for future planning applications. To avoid this it would be simpler if development briefs were submitted with the first (and all subsequent) planning applications on the allocated site and not required to be submitted and approved by the Council in advance of that planning application.
- d. Adopting the above approach would ensure that the development briefs provide a positive contribution to the planning and delivery of the strategic allocations rather than unnecessarily delaying and frustrating development.

**Savills**

**1 February 2023**