

**EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN
REVIEW**

Hearing Statement on Behalf of Vistry Group

Matter 6: Site Allocations

Respondent Ref: 912

February 2023

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1. The following Hearing Statement has been prepared on behalf of Vistry Group in relation to Inspector’s Matter 6: Site Allocations. This Statement addresses questions raised by the Inspector of relevance to previous representations made by BBA Architects and Planners on behalf of Vistry Group, and should be read in conjunction with those representations.
2. This statement covers the Inspectors Issue 6, and questions 15 and 49.

Q15. Overall, is each site allocation justified, viable and deliverable or developable (in accordance with the Framework definitions)?

3. The Councils approach to site selection for housing allocation is not based on directing development to the most sustainable settlements in the district and is therefore unsound. Site selection does not appear to be based upon the settlement hierarchy (as set out in Policy CP3). For example, 370 dwellings are proposed at Newton and Sharpness (includes Sharpness Docks) when Newton and Sharpness is considered a Tier 3a Settlement whereas Wotton-under-edge (a tier 2 settlement) and Kingswood (should be considered a tier 2 settlement with Wotton) only have 50 dwellings allocated between them.
4. Below is a table which shows how the site allocations are distributed between the different settlement tiers set out in Core Policy CP3 (including Strategic development)

Tier	Number of dwellings allocated
New Settlements	3,900
Tier 1	1,965
Tier 2	1,090 (340 excluding Hunts Grove)
Tier 3a	2,090 (740 excluding South of Hardwicke)
Tier 3b	0

5. The above illustrates that there appears to be little logic in the distribution of housing allocations and little relation to the sustainability of the settlement. The lower number of dwellings allocated to tier 2 settlements is distorted by the absence of any allocations for Wotton-Under-Edge. Whilst this is justified by sensitivity of the surrounding landscape around Wotton, housing allocations could be provided at Kingswood which is located outside of the AONB and closely related to Wotton Under Edge, shares many facilities and could accommodate further growth.
6. Furthermore, the village of Kingswood is very well-strategically located, being in close proximity to Junction 14 of the M5 and the train station at Charfield (planned for re-opening), and integral to the planned Sustrans traffic-free segregated strategic cycle route connecting Wotton, Charfield and Kingswood (the ‘WCK Greenway’) to local employment opportunities, education, leisure and retail facilities. The village of Kingswood itself is also well served with community infrastructure including a primary school, shop, pub, village hall, post office and

recreation facilities and is therefore able to accommodate further strategic growth sustainably.

7. The Council originally undertook an assessment of Vistry's Wotton Road, Kingswood, Site (KIN001) in the SALA in 2017 and decided to discount it based on general conclusions and assumptions. Representations on behalf of Vistry, submitted by Barton Wilmore in January 2020 provided a review of the Councils 2019 Sustainability Appraisal which included an assessment of the site. The representations included the submission of a Landscape and Visual Impact Study and since then further information has been submitted including a Heritage Assessment and a Vision Document which show how the site could be developed. An updated Vision Document has now been prepared which includes additional and updated information in relation to Ecology, Landscape, Heritage, engineering, Flood Risk and Drainage (See appendix A). Despite the submission of additional and relevant information, the Council has not reassessed the potential of the site to accommodate housing development.
8. Whilst on the edge of an Area of Outstanding Natural Beauty (AONB) the site itself is not an area of high landscape sensitivity and this has been fully assessed in the preparation of the Vision Document for the site. It demonstrates that the site can be developed without impacting the flood zone in the valley floor and the reasons for dismissing the site are unfounded. The site is well contained visually, is well related to the village and crucially, delivers a key section of the WCK Greenway cycle route. The site is accessible, deliverable, in single ownership and under the control of a leading housebuilder and would be able to deliver housing within the first five years of the Plan period. The site could make a valuable contribution to market and affordable housing in the Wotton Cluster area and should be appropriately considered for development.

Matter 6H The Wotton Cluster Site Allocation

Employment Allocation Policy PS47 Land West of Renishaw New Mills

Q49.

- a. **Is an extension to the existing employment site in this location justified by robust evidence?**

9. Renishaw New Mills (10ha of Employment Land) is one of the principal employment allocations in the draft Local Plan. Renishaw is an established employer in the district and the allocation of the site will enable its continued support and growth.
10. The increase in employment at Renishaw will have significant benefits on the Wotton Cluster which already has a significant amount of employment and has very good access to facilities and services. This reinforces that this area would be a sustainable location for further housing, and Kingswood's relationship and proximity to both Wotton-Under-Edge and Renishaw make it an ideal location for further housing allocation. Kingswood, and the Vistry site, will be directly connected to the Renishaw employment site by an active travel route; the Sustrans WCK Greenway, segregated strategic cycle route.

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APPENDIX A: LAND AT WOTTON ROAD, KINGSWOOD | VISION DOCUMENT