

## Matter 2 Spatial Strategy and Site Selection Methodology

Sharpness LLP

**Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence?**

**(Please note that these questions relate to the overall spatial strategy and the site selection methodology. Further questions on unmet needs and specific site allocation are set out under later matters.)**

### **Vision and objectives**

- 1. Does the Plan set out a suitably positive and realistic vision for the future development of the District as a whole?**
  - 2.1 Yes, the vision sets out aspirations for the future development of the District. The vision is based on the previous vision as set out in the 2015 Local Plan, but this has been refined to take into account new evidence, consultation responses to the Plan throughout its preparation as well as national and local objectives, particularly in relation to the aspiration to be carbon neutral by 2030. The Plan has also had specific regard to the growth requirements of the District up to 2040 as well as the constraints within the District and consequently produced a realistic, positive and deliverable vision for future development, across the District.
- 3. Have the seven strategic objectives (S01, S01a and S02-S06), included in Chapter 2 of the Plan, been positively prepared, are they justified and are they consistent with the overall vision and the priority issues facing the District?**
  - 2.2 Yes, the strategic objectives (S01, S01a and S02-S06) have been informed and reflect the 40 Key Issues identified at Pages 11-16. This is particularly so with regard to the transport and climate change initiatives being developed within the plan that place a strong emphasis on the rail infrastructure and alternative modes of transport such as cycling and walking. These initiatives are particularly reflected in the PS36 Strategic Allocation at Sharpness.

## Spatial strategy

The Framework states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (paragraph 20). Chapter 2 of the Plan sets out the Development Strategy and a number of ‘development strategy headlines’ are also set out in text (page 23).

The Plan identifies, in the supporting text for Core Policy CP2, that the objectively assessed needs of the District for the period 2020-2040 will be met through a strategy which concentrates most development at a series of strategic sites to be ‘located at the principal settlements within the District, at new settlements and within the key employment property market areas...’. Smaller scale development is expected to come forward in accordance with the settlement hierarchy. However, the policy mainly just lists the proposed strategic growth and development locations.

Core Policy CP4 is described as ‘Making Places: a Spatial Vision for Stroud District’. It sets out a number of development principles which appear to be covered by other policies within the Plan.

4. **Is the spatial strategy justified by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?**
- 2.3 Yes, the spatial strategy has been rigorously tested and taken through consultation. Looking at the growth requirements of the District and its constraints, the strategy creates a positive and sustainable pattern of development for the District up to 2040 and provides a framework for future sustainable growth beyond this period. This reflects and aims to respond to the key issues identified in Chapter 2. At 2.3 within Chapter 2, which relates to ‘an introduction to the development strategy’, it sets out the testing of options that has taken place throughout the consultation stages of the SDLPR to refine the strategy.
6. **Is the strategy consistent with the settlement hierarchy and is the scale of development proposed at relevant settlements justified?**
- 2.4 The settlement hierarchy for growth is set out in Core Policy CP3. This policy looks for proposals to be located in accordance with the District’s settlement hierarchy to ensure that that

development reduces the need to travel and promotes sustainable communities based on the services and facilities that are available in each settlement. This is consistent with the overall strategy within the SDLPR as outlined at the Overall Strategy Headlines.

- 2.5 Sharpness LLP are the promoters of Site Allocation PS36 at Sharpness.

*PS36*

- 2.6 Strategic Site Allocation PS36 allocates land at Sharpness for a new garden community that will combine a mix of uses that will enable residents to have the opportunity to work and live in the same community and travel less in their day to day activities.
- 2.7 In the NPPF (paragraph 73) the Government encourages local authorities to investigate the delivery of new settlements as it is considered that a large supply of new homes can often be best achieved through planning for large scale development. The SDLPR has embraced this approach with the allocation of PS36. Paragraph 2.9.19 of the Plan acknowledges that Sharpness are not included in the settlement strategy at present and the scale and rate of development at Sharpness will be determined through the detailed criteria set out in policy PS36 and a subsequent planning application for the development of the site. It is recognised that once development is sufficiently advanced to establish their anticipated role and function, the new settlement will then be defined as a settlement in its own right, with settlement development limits subsequently being defined.
- 2.8 Garden communities are strategic, larger-scale new developments of 1500 or more dwellings. The garden community was founded on the principles of community inclusion and walkable, sociable, vibrant neighbourhoods. Communities should be holistically and comprehensively developed, with a distinct identity that responds directly to their context. They should be of sufficient scale to incorporate a range of homes, employment opportunities, green space and other uses, thereby enabling residents to meet the majority of their daily needs in the local area and reducing the need to commute elsewhere.
- 2.9 The development and delivery of a new garden community at Sharpness is therefore consistent with the vision of the local plan and once developed, will be consistent with the overall settlement hierarchy of the District and the plan.

**8. Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?**

2.10 One of the priority issues at Page 12 is to '*maximise the potential of brownfield and underused sites to contribute to housing supply*'. Throughout the SDLPR, a number of brownfield sites are allocated for development and the plan does prioritise the development of brownfield land first.

**9. Do Core Strategy Policies CP2 and CP4 take a sufficiently strategic approach to clearly define the development strategy for the District as a whole? Should consideration be given to a new policy encompassing the elements of the District wide spatial strategy that are set out in chapter 2 of the Plan, such as the key development strategy headlines?**

2.11 The development strategy headlines are set out within Chapter 2 and reflect the key issues outlined. Strategic growth and development locations are defined in paragraph 2.9.10. These are complimented by the Mini Visions set out in Policy CP4. Overall it is considered that these do provide an appropriate strategic approach to define the development strategy for the District and does not require an additional policy, which may over complicate the desired strategic objectives.

**14. Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council's vision?**

2.12 Sharpness LLP believes that the Local Plan's spatial strategy will meet the overarching strategic objectives required by the Council's vision. One of the priority issues is to ensure new development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by:

- concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure;
- creating new sustainable communities at locations where development can transform existing access to services and infrastructure;
- concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth

- 2.13 In terms of housing and employment growth, the development strategy headlines highlight at Paragraph 2.3.7 that, that the spatial strategy will provide 2 new settlements where there is potential to create new sustainable communities along garden village principles.
- 2.14 The allocation of PS36 is an integral part of the spatial strategy as it provides a large amount of the Districts new growth requirements in a new sustainable garden community, as well as avoiding development in the more heavily constrained areas of the District.

#### **Settlement hierarchy**

**The Council has produced a Settlement Role and Function Study (2014) (EB71) and an Update (2018) (EB72) to inform the settlement hierarchy and the development strategy. The Plan sets out the settlement hierarchy in Core Policy CP3.**

- 15. Overall, is the settlement hierarchy and how it relates to the development strategy clearly explained within the Plan and is the approach justified, effective and consistent with national policy?**
- 2.15 The supporting text to Policy CP3 highlights how it relates to the overall strategy for development. Paragraph 2.9.15 highlights that one of the primary aims of establishing a settlement hierarchy is to promote sustainable communities by bringing housing, jobs and services closer together in an attempt to maintain and promote the viability of local facilities and reduce the need to travel to services and facilities elsewhere. It goes on to note that the settlement hierarchy *'can help to achieve this by concentrating housing growth in those settlements that already have a range of services (as long as there is capacity for growth), and restricting it in those that do not. The development strategy aims to prioritise growth at sustainable locations, in accordance with the settlement hierarchy set out here in Core Policy CP3'*. This provides the justification as to how it relates to the overall strategy, and is consistent with the national, as well as local objectives to achieve sustainable development.
- 2.16 The development strategy is also aligned to the development of two new settlements to support sustainable growth. New settlements do provide an appropriate growth option for local authorities especially where they need to deliver a large volume of growth and they wish to do this in a sustainable way. This approach is supported by national planning policy and will ultimately be subsumed into the settlement hierarchy of the District.

2.17 Sharpness LLP therefore believe that the settlement hierarchy does relate to and is sufficiently explained within the development strategy, and the approach taken has been justified.

**16. New settlements are proposed within the Plan, at Sharpness and Wisloe, but are not included in the settlement hierarchy. The approach in the Plan is to define these as settlements through a future Local Plan Review. Yet reference is made to ‘anticipated’ local centres within these settlements within Core Policy 12.**

**a. Why are these proposed new settlements not in the hierarchy?**

**b. If housing and employment growth will be centred at these new settlements, how will the distribution of growth in the Plan reflect the settlement hierarchy if they are not included within it?**

**c. How will development proposals at these locations be dealt with where several policies in the Plan refer to the settlement hierarchy in their application?**

2.18 The settlement hierarchy has been designed to refer to existing settlements and each of these settlements is placed in a category with regard to its general size and the level of services it provides.

2.19 The new settlement do not presently exist as settlements and accordingly cannot be classified within the settlement hierarchy. The objectives of the new settlements are clearly defined on page 31 of the Plan and the requirements of Sharpness are expressed in Policy PS36 (page 178 of the Plan).

2.20 Paragraph 2.4.6 explains that the *proposed* new settlements do not feature in the settlement hierarchy, simply because they do not exist as an *settlement entity* at present. However, it is explained that once they have been created during the Plan period, they will in the future be identified as “settlements” and settlement development limits will be drawn and subsequently applied.

2.21 The distribution of growth proposed in the Plan has been clearly set out to include the development of the new settlements as well as the hierarchy of other settlements.

2.22 Development proposals at these locations will be dealt with holistically as part of the planning application to deliver the new settlements. The proposals within the Sharpness new settlement are adequately dealt with by the criteria set out within Policy PS36.