



# The Planning Inspectorate

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Mr David Hagg  
Chief Executive  
Stroud District Council  
Ebley Mill  
Stroud  
Gloucestershire  
GL20 5TT

Your Ref:  
Our Ref: DP 328  
Date: 24 November 2004

Dear Sir

## STROUD DISTRICT LOCAL PLAN TO 2011 REPORT OF PUBLIC LOCAL INQUIRY INTO OBJECTIONS

1 I refer to the above inquiry which opened on 15 January 2002 and closed on 3 June 2003. The majority of inquiry sessions were held at the First Floor Offices, The Cross, Parliament Street, but the session on the 'Lister Petter' site held on 14 March 2003 and the closing session were held at the Council Offices, Ebley Mill. I carried out unaccompanied site visits before the inquiry opened, accompanied and unaccompanied visits during the course of the inquiry, and unaccompanied visits after the inquiry closed. In November 2003 I submitted an early part report on the Brockworth Airfield allocation, in June 2004 I submitted an early part report on the Strategy Chapter of the Plan, and in July 2004 I submitted a further part report on the first part of the Housing Chapter dealing with housing strategy and with the Hunts Grove allocation and its major competing omission sites. I now submit my full report with my conclusions and recommendations covering all the matters subject to objection for your Council's consideration.

2 For the Council, the inquiry was the culmination of work over several years. The draft deposit version of the Plan was published for consultation in November 1999, and was based on work carried out between 1997 and 1999. However, much was to change between November 1999 and the close of the inquiry. The Government published revisions to two key elements of its national policy, PPG3 and PPG12, in the few months after the publication of the Deposit Draft. The former demanded a thorough review of the urban capacity of the District in the context of meeting housing need, and introduced the sequential approach to site selection; the latter introduced the double deposit for local plans and came with new Regulations. Under the 1999 Town and Country Planning (Development Plan) Regulations, the second tier consultation took place upon the publication of the Revised Deposit for 6 weeks from 16 October 2000. The consideration of those representations took place in late 2000 and the first half of 2001. At that stage, the Urban Capacity Study and Housing Needs survey work was considered. This led to the publication in June 2001 of Pre-Inquiry Changes and Proposed Changes. This stage is not formally required by the 1999 Regulations, but is supported by Planning Policy Guidance Note 12. The Pre-Inquiry Changes were the subject of consultation between 18 June and 30 July 2001, and the statutory procedure for publicity and notification was used. A further category of changes, the Proposed Changes, were also published; following the Pre-Inquiry Meeting,

targeted consultation was undertaken on them. The Inquiry therefore had before it objections and representations on the Deposit Draft, Revised Draft and Pre-Inquiry Changes/Proposed Changes. A total of 3380 objections were made to the three stages, of which 693 were subsequently withdrawn.

3 In accordance with accepted practice my report is in the short form. The respective cases for objectors and the Council are not repeated at the beginning of each section: the main issues are merely set out very briefly. My analysis and conclusions focus on the main issue or issues identified from the objections. I have considered objections equally, whether or not they were supplemented by written representations or an appearance at the Inquiry. Where a minor issue has not been referred to individually in the text, it does not mean that it has been overlooked. In particular, I have not referred to supporting representations, although I have considered them all. All matters raised in the duly made representations have been taken into account, but not all are of sufficient weight to mention or to alter the considerations on which my conclusions and recommendations are based.

4 I now comment briefly on the major issues that arose in the consideration of objections. These principally concerned the Plan's Strategy, and the Housing strategy which followed from it. Very many of the objections, particularly those which sought the allocation of 'omission sites', hinged to a large extent on the contention that the overall strategy, and the MU1 Hunts Grove allocation in particular, were ill-conceived. The planning approach to Cam/Dursley, and in particular the Lister Petter site, was also highly contentious.

5 It will be seen that I have, to a very large extent, not been convinced by the objections that the Council's approach has been wrong, although I have recommended substantial modifications with regard to drafting of the Strategy and Housing Chapters. The main contentions were that the sequential search for housing sites as laid down in the Plan's strategy was faulty, that too much development had been directed to the Central Severn Vale, and that Hunts Grove should be abandoned in favour of either dispersing development around smaller sites, or diverting the allocation to one of two other major sites put forward – 'Stroudwater' (West of Stonehouse) or Hardwicke Green. The objections included one from Gloucester County Council that the Plan was not in conformity with the Structure Plan.

6 I have found that the search sequence followed by the Council has correctly interpreted strategic and government policies, and that the emphasis on the Central Severn Vale was not misplaced. I have favoured the Council's approach to providing a major development site under proposal MU1, since that is the best way to provide for a sustainably located development of a scale that would allow for a largely self contained, high quality community to be provided, along with necessary social infrastructure including employment. I have concluded that it certainly would not be a sustainable option to disperse this development. With regard to the two competing sites, neither has been shown, in my judgement, to be any better overall than the Council's proposal, and in a number of respects they are inferior.

7 One of the recommendations, which I should mention here, is that Hunts Grove should be included in the final phase of the Plan period, rather than start in the mid-period. This is an outcome of my consideration of the practical likelihood of substantial development starting on the site any earlier, rather than any other consideration, but does have the effect that I recommend that the capacity of the site up to 2011 should be regarded as 1000 dwellings rather than 1500 dwellings. This has the knock on effect that the balance of the site will be developed after 2011, in the next plan period. I consider that this is satisfactory having regard to the Ministerial Statement made by Keith Hill in July 2003 in which he refers to the need to make provision for at least ten years potential supply of housing from the plan's forecast adoption date. I recommend that the extent and capacity of the site should not

be modified (other than to reflect the change introduced by the Council itself to allocate a smaller site than shown on the draft Proposals Map) because I consider that a major development is needed in order to bring the benefits that I refer to in paragraph 6 above. I have also concluded that the two rival omission sites would be unlikely to start earlier than Hunts Grove (and conceivably later), due to the necessary work preliminary to the making of a planning application, following the receipt of my report and the Council's ensuing decisions, and the approval of details. In reaching my conclusions and recommendations, I have had to take a view about the effect of the Hunts Grove development on a major site within Gloucester City at Quedgeley. As explained in my report, I have made a judgement in circumstances which leave a lot to be desired.

8 Other matters necessarily considered in approaching these main issues include the overall supply of housing, the extent to which 'windfalls' will contribute, whether the needs of all the District have been met, and whether the regeneration of town centres, especially Stroud, will be supported. On the question of the overall supply of housing, I have concluded that the Council's allowance for windfalls is about right and, with the totality of my recommendations on housing sites, that the Structure Plan housing target will be met. In this connection I have recommended that there is no need to include an extra percentage to account for the possibility of planning permissions not being implemented, etc., but as in the Council's Revised Deposit Draft Plan itself, the outcome of my recommendations is for a figure a little above the Structure Plan target. Furthermore, taking account of development in the full plan period, I am satisfied that the needs of the whole district will have been met, both numerically and spatially, and that proper account has been taken of the need to encourage the regeneration of town centres, especially Stroud town centre.

9 As for Cam/Dursley and the Lister Petter site, the Plan was evolving as the inquiry progressed. Following the acquisition of the majority of the site by the South West Regional Development Agency, various studies were undertaken and a Masterplan produced. Amongst others, there were objections to the total number of dwelling proposed on the site, and the development costs which underlay the viability argument relating to the proposed dwelling numbers were questioned. The Council's revised proposals include a new link road to replace the 'Dursley Inner relief Road'. The proposal will also enable a major contaminated brownfield site to be brought forward for development, and will safeguard employment opportunities. I am satisfied that the overall approach is sound. In making objections to a development plan, it is for objectors to demonstrate that there are material shortcomings to the plan prepared by the planning authority. I have not been convinced that this is so in respect of these elements of the Plan.

10 Since the Inquiry closed, the government has published a number of revisions to its planning guidance. The Council will need to have regard to the contents of this recent guidance, and any other emerging guidance, during its consideration of my report.

11 I should like to thank all who appeared at the Inquiry, for their courteous assistance, in particular Mr Rupert Warren of Counsel who appeared for the Council, and the team of Council witnesses, since they bore the brunt of the work throughout the inquiry. I give special thanks to my Programme Officer, Mrs Sarah Weyman, who was as helpful to all participants, I am sure, as she was to me. She arranged the inquiry programme, maintained the library and chased objectors and the Council for evidence when required, and carried out all her duties in a most pleasant and helpful manner.

12 Finally, I thank my Assistant Inspectors Ms Mary Travers and Mr Eric Searle, and the Inspectorate's Planning Officers Ms Claire Durbin and Mr Mark Wilson. Ms Travers was the Inspector appointed to hold the public local inquiry into objections to the Tewkesbury Borough Local Plan and we were appointed assistant to each other to ensure a common

understanding and a consistent approach to the issues raised by the objections to Brockworth Airfield strategic site which overlaps the administrative boundaries. I am grateful for all their assistance in dealing with a long and complex inquiry, and the resultant demanding reporting task. Any shortcomings in the report are, however, entirely mine.

13 A copy of this letter has been sent to the Government Office for the South West and to the Office of the Deputy Prime Minister.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Terrence Kemmann-Lane'. The signature is written in a cursive style with a horizontal line at the end.

TERRENCE KEMMANN-LANE DipTP FRTPI MCIM  
Inspector