

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

Hearing Statement on Behalf of Vistry Group

Matter 2: Spatial Strategy and Site Selection

Methodology

**Respondent Ref: 912**

**February 2023**

HEARING STATEMENT ON BEHALF OF VISTRY GROUP  
MATTER 2: SPATIAL STRATEGY AND SITE SELECTION METHODOLOGY

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1. The following Hearing Statement has been prepared on behalf of Vistry Group in relation to Inspector's Matter 2: Spatial Strategy and Site Selection Methodology. 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 2, and questions 4, 5, 6, 14, 15, 16, 17, 26, 30
- Q4. 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?**
- Q5. Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How were the locations for the two new settlements at Sharpness and Wisloe identified and was the process robust?**
3. The Pre Submission Draft Plan proposes to allocate a total of 9,065 dwellings (not including an additional 3,000 dwellings at Land at Whaddon) to achieve the housing requirement, which is set at a minimum, with an appropriate buffer.
4. Of the 9,065 dwellings proposed to be allocated, 89% are proposed on strategic allocations and only 11% on Local Development Sites. The difference between Strategic Development sites and Local Development Sites is not clearly defined in the Pre-submission draft, but generally Local Development Sites are all below 200 dwellings each (Cam North East Extension is an exception to this and the 180 dwellings here are included as a Strategic Development Site) and are allocated at existing settlements.
5. Of the eight Strategic Development sites proposed, only two are below 300 dwellings with almost half of the dwelling numbers being directed to two new settlements at Sharpness and Wisloe (a total of 3,900 dwellings in the plan period). Only 1,780 dwellings (at 3 sites) are allocated at sites associated with the main settlements in Policy CP3.
6. Delivery of the housing requirement is completely reliant on a small number of strategic allocations with the majority of these not focused at settlements considered to be the most sustainable in the district. The Council have not provided any clear justification for this approach.
7. The Development Strategy Topic Paper (EB4) suggests that the strategy was derived as a hybrid approach of various options which were tested through consultations and through sustainability appraisal. However, this is not a true reflection of the relative merits of the approach taken. The "hybrid" approach has been tested against singular objective scenarios (i.e concentrated development) rather than other variations of the hybrid approach. Further

options were tested to achieve more housing growth through the Additional Housing Options Consultation. However none of these have been taken forward as the housing requirement was not increased (Please refer to Vistry's Additional Housing Options consultation response for comment on these various options).

8. The "hybrid approach" taken is in fact very much focused on delivery of a handful of large scale sites including two new settlements.
9. In terms of the original growth strategy options It is noted that the Council's option 3 Development Strategy (Dispersal) showed a total of 3,780 dwellings on smaller and medium size sites could be delivered via a wider distribution of housing across the district (EB73 Developing a preferred strategy (revised March 2018)). Whilst it is recognised that this option performed the worst of the 4 options tested, it demonstrates that there is further capacity to deliver dwellings beyond the 985 dwellings allocated to Local Development Sites. Not all the 3,780 dwelling capacity would be appropriate for development, but a better mix between large scale strategic sites and Local Development sites could be achieved.
10. A mix of the size, type and location of housing allocation offers the opportunity to spread developments sustainably amongst existing sustainable locations around the district and support existing communities rather than focusing on the creation of new communities, which could be to the detriment of existing thriving market towns and villages within the district. A new settlement may be necessary, but the size and number of dwellings allocated should be considered once capacity for existing settlements in accordance with the settlement hierarchy have been reviewed. This would secure increased housing delivery, particularly within the first five years of the Plan period, as smaller strategic sites, in particular those under the control of a single housebuilder with control of the land, can be delivered early and with greater certainty of viability.
11. The focus on a handful of larger allocations to deliver within the plan period puts at risk the housing requirement being achieved. Larger development sites generally take longer to come forward and there is more risk to their delivery. There is also often little incentive for large scale developments to deliver quickly as they would be effectively competing with themselves in terms of the houses they complete and which are on the market. Housing delivery is maximised by the provision of a mix of housing site sizes and a wide spread of market locations. A wider mix provides choice for housebuyers and importantly ensures that there is competition which not only incentivises the faster delivery of housing but also would ensure that the price of new housing stays competitive.
12. The proposed strategy and Core Policy CP2 is unsound as the current approach is not justified and would not be effective in ensuring that the housing requirement is met or effective in ensuring that the Council maintains a five year housing land supply across the plan period.
13. An effective strategy would be to increase the percentage of dwellings allocated to Local Development Sites. This would not only make delivery more robust across the plan period, it would also ensure the development is more appropriately spread across the district,

improving delivery and reducing the risk of reduced delivery rates as a result of competition, and spreading the delivery of affordable housing more appropriately around the district.

14. As noted above, there is clearly capacity for more Local Development sites to make a contribution to the housing requirement which would be in accordance with the Settlement Hierarchy. As an example, the Wotton Cluster only has 50 dwellings allocated to it. This appears to be as a result of the settlement of Wotton-under-Edge being highly constrained, but ignores the opportunity to locate further development at Kingswood which is well-served with facilities and also well-connected via sustainable modes of transport to Wotton and major local employment opportunities (please see response to q.15 below). The Settlement Role and Function studies (2014 and 2018, EB71 and EB72) recognise the sustainability of Wotton-under-Edge and Kingswood and it would appear that if it were not for the AONB around Wotton-under-Edge, the town would be a priority location for expansion – as stated on page 75 of the 2018 Study Update (EB72)
  15. To make Core Policy CP2 sound, the percentage of dwellings to Local Development Sites within/adjacent to accessible, sustainable settlements should be increased. This could be achieved by reducing the numbers of dwellings allocated to the new settlements in the plan period, taking into account realistic delivery rates and land assembly and technical barriers to delivery, or removing one or two strategic sites which are in direct competition with other strategic sites.
  16. Further housing allocations should be directed to the Wotton Cluster as a sustainable location for growth and balancing with the significant employment allocation proposed. With Wotton-under-Edge physically constrained, Kingswood, which is closely related to, sustainably connected to, and shares much of its facilities with Wotton-under-Edge would be an appropriate location for further housing allocations.
  17. However, if the Inspector's are minded to maintain the existing proportion of Strategic Allocations, Reserve Sites should be included to provide flexibility and a contingency to ensure the housing requirement is met and the plan remains effective. Kingswood would be an appropriate location to identify additional reserve sites.
- Q6. Is the strategy consistent with the settlement hierarchy and is the scale of development proposed at relevant settlements justified?**
18. The proposed approach to strategic housing allocation is inconsistent with the Settlement Hierarchy. The general approach of the settlement hierarchy policy (CP3) is sound as it directs development to the most sustainable settlements in the hierarchy. However, the allocation of strategic development sites is inconsistent with this sound approach:
    - Almost half the strategic allocations are directed to two new settlements which are not included in the settlement hierarchy

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- 1,350 dwellings are proposed at land south of Hardwicke, yet Hardwicke is considered a tier 3a settlement
- 750 dwellings are proposed for Hunts Grove which is “anticipated” to be a Tier 2 Settlement
- 300 dwellings are proposed at Sharpness Docks, separate to the Sharpness new settlement allocation. Sharpness is considered to be a tier 3a settlement

19. On the basis of the above it appears that the settlement hierarchy has had no influence on the location of strategic development allocations. The approach means that the housing allocations do not correspond to the Settlement hierarchy and the Council are not directing allocations to the most sustainable locations.

20. Where there are available and suitable deliverable sites, these should be allocated at the more sustainable locations. These should be reviewed before there is justification for such an overreliance on a few large strategic sites.

**Q14. Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council’s vision?**

21. For the reasons covered in answers to question 4 and 5, the Council will not achieve their strategic objective for housing with affordable and quality housing for local needs as the housing requirement will not be delivered within the plan period, due to an overreliance on a small number of strategic sites, including two new settlements.

**Q.15 Core Policy CP3 states that proposals for new development should be located in accordance with the hierarchy. The Council indicates this will assist in delivering sustainable development, by concentrating growth in those settlements that already have a range of services and facilities.**

- a. Has the settlement hierarchy been derived using a robust and justified process and is it supported by credible evidence?**
- b. It has been suggested by representors that some settlements (including Minchinhampton, Painswick, Chalford and Kingswood) should be re-categorised within the hierarchy. Does the settlement hierarchy accurately reflect the role and function of different settlements within the District and are the settlement categorisations justified by robust and up-to-date evidence?**

22. The classification of settlements in to different tiers depending on their size, transport infrastructure and levels of facilities and services is generally a useful tool in determining the most suitable and sustainable location for new development.

23. However, the tiering system, and the designation of Kingswood as a tier 3a settlement has failed to recognise the relationship between Kingswood and the “tier 2” settlement of Wotton-under-Edge and the number of facilities and services available within Kingswood which make it more appropriately allocated as a Tier 2 settlement. It is noted that there are other settlements (Cam and Dursley, Sharpness and Newtown) that have been grouped because of their functional and physical relationship and this could equally apply to Wotton-under-Edge and Kingswood.
24. One of the criteria used to determine the settlement hierarchy is access to Strategic Level Services. Four strategic level services which have been attributed to Wotton Under Edge (A secondary School, sixth form, sports centre and swimming pool) are all within 500m of Kingswood; the secondary school being within only 100m, a short walking distance, of the Vistry site at Kingswood. The Settlement Role and Function Study (2018, EB72) shows that Kingswood has ‘very good’ overall accessibility and benefits from better access to strategic level services than a number of Tier 2 settlements and levels of accessibility comparable to Wotton Under Edge.
25. The Study also notes Kingswood is as significant provider of jobs and significant importer of workers (Table 7: Summary of employment role and function, Settlement Role and Function Study,2018). This would further increase with the proposed employment allocation at Renishaw New Mills (10ha). This proposed allocation further supports Kingwood being considered in a higher tier.
26. The undervaluing of Kingswood as a sustainable settlement and the failure of the settlement hierarchy to acknowledge the links between Wotton Under Edge and Kingswood has a significant impact on the development strategy and the soundness of the plan in general.
27. The purpose of Core Policy CP3 and the designation of settlements into a hierarchy is intended to ensure that development is directed to the most sustainable settlements. As a result therefore, Wotton-under-Edge, as a Tier 2 settlement, and the largest settlement within the Wotton Cluster, would be expected to be a focus for new development. However, due to its physical constraints, no development is proposed for the settlement. This is acknowledged within the Settlement Role and Function Paper. The Paper states in relation to Wotton Under Edge:

*“Growth should be prioritised towards the District’s larger and better-resourced settlements. As one of the District’s main towns, Wotton-under-Edge should be a priority location. However, the town faces significant environmental, physical and topographic constraints, which make significant expansion difficult.*

*Wotton-under-Edge’s relatively balanced population and healthy ratio of working-age residents is positive in terms of sustaining the settlement’s services and facilities. But having experienced relatively low housing growth since 2011, given its size and functionality, (and with no significant development currently anticipated), Wotton may benefit from some planned development, targeted and scaled to meet local housing needs.”*

28. The failure to acknowledge the link between Kingswood and Wotton-under-Edge in the plan means that the only very limited number of housing is proposed for the whole of the Wotton Cluster which leads to an imbalance in planned housing provision across the plan area.
29. The plan highlights a number of key issues facing the Wotton Cluster which includes:
- Ensuring adequate provision of affordable housing and opportunities for downsizing for local people
  - Preventing the loss of employment sites to housing, providing for low skilled job opportunities
  - Maintaining and improving vitality of Wotton High Street (paragraph 3.7.4, Pre-submission draft Local Plan)
30. None of the above issues are capable of being addressed with a stagnant or limited growth in the population within the Wotton Cluster (which is currently planned) within the plan period, particularly with diverting growth to two new towns with competing local centres, located nearby.
31. Policy CP3 states that the scope for future growth at Tier 3 settlements is constrained. This is simply not the case at Kingswood.
32. Kingswood has the potential to provide additional housing allocations which are unconstrained by the Green Belt or AONB, landscape and flooding constraints, and due to its proximity and shared facilities and services can help meet the needs of Wotton-under-Edge in scale with its role as a tier 2 settlement and the principal settlement in the Wotton Cluster.
33. The Settlement Role and Function Study 2018 concludes in relation to Kingswood:
- Kingswood is relatively unconstrained by its environment and topography.*
- In accessibility terms, Kingswood offers a relatively sustainable location for potential growth and development, despite its lower tier status. It benefits from proximity to the larger service-centre settlement of Wotton-under-Edge and very good accessibility to key services and facilities.*
34. Kingswood should be redesignated as a tier 2 settlement, or at the very least, the connection between Kingwood and Wotton-under-Edge needs to be recognised and the reference within the Draft Local plan 2019 to tier 3a settlements helping to meet housing needs of more constrained tier 1 or tier 2 settlements reinstated.
35. The designation of Kingswood as a Tier 3a settlement without a statement within the policy to say that Tier 3 settlements can help meet the needs of more constrained Tier 1 and Tier 2 settlements is not sound as it not justified and will render the plan ineffective. There will be an insufficient distribution of housing across the plan area and the plan will fail to meet the issues and top priorities for the Wotton Cluster recognised within the plan.

36. To make the plan sound, Core Policy CP3 should be amended to either:
- Include Kingswood as a Tier 2 settlement, recognising its shared facilities with Wotton-under-Edge (as a minimum), or
  - Recognise the connection and sustainable connectivity between Kingwood and Wotton-under-Edge, and the inability of Wotton-under-Edge to deliver an appropriate amount of housing and reinstate the reference within the Draft Local plan 2019 to Tier 3a settlements helping to meet housing needs of more constrained Tier 1 or Tier 2 settlements.

**Q.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 CP12.**

- 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?**

**Q.17 Core Policy CP3 lists Hunts Grove as being a tier 2 local service centre (anticipated). Yet paragraph 2.9.19 states that Hunts Grove is not included within the settlement hierarchy. Can the Council clarify this and also explain why Hunts Grove is ‘anticipated’ as a tier 2 settlement?**

37. The Council’s approach to the classification of the proposed new settlements/strategic allocations is not clear or consistent and has not been appropriately justified. This is particularly apparent in relation to Hunts Grove and Sharpness.

38. CP3 states that Hunts Grove is “anticipated” to be a Tier 2 Local Service Centre, that is despite it being an extension to the south of Gloucester rather than a settlement in its own right. It is not a market town or a large village (as Tier 2 settlements are described) and the purpose of including it as a Tier 2 settlement is not clear, other than to justify the further extension of it as proposed in policy CP2. However, other more established settlements (such as Kingswood) would be far more justifiable as Tier 2 settlements and therefore appropriate for further development.

39. Sharpness is designated as a Tier 3a settlement. This is based on its current level of development. However, the Council’s approach to Hunts Grove would suggest that the



proposed new settlement would fall into a different category. Its location in Tier 3a suggests that scope for future Growth is constrained, which calls into question the appropriateness and deliverability of the new settlement, and a further 300 houses at Sharpness Docks in this location.

**Q.26 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?**

40. There is no clear link between the settlement hierarchy and the allocation of development in the development strategy. There are clear inconsistencies between the identification of settlements and their role and this has an impact on the delivery of strategic objectives.

**SITE SELECTION METHODOLOGY**

**Q.30 Overall, has the process robustly identified and assessed all relevant sites?**

41. The Council's approach to site selection has been unnecessarily constrained by the inappropriate identification of Kingswood as a tier 3a settlement and by the Council general strategic approach of focus on a small number of strategic allocations rather than looking to allocate sites in sustainable locations which can help deliver the strategic and cluster based objectives.

42. Vistry's site at Land at Wotton Road, Kingswood was discounted in the Strategic Housing Land Availability Assessment 2017 (KIN001). The SALA 2017 provides short statement in relation to the site as follows:

*The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site, beyond the strong valley floor boundary to the settlement and Conservation Area. Development may impact on the flood zone in the valley floor. There are therefore physical constraints and potential impacts preventing sustainable development in this location.*

43. Representations on behalf of Vistry, submitted by Barton Wilmore in January 2020 provided a review of the 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. The failure to fully reassess the scheme when new evidence is presented which should lead the Council to different conclusions fundamentally undermines the site selection process.

44. 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.

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**APPENDIX A – LAND AT WOTTON ROAD, KINGSWOOD | VISION DOCUMENT**