

## Examination of the Stroud District Local Plan Review (Crest Nicholson: 897)

### Matter 6 Site Allocations

#### Issue 6 - Are the proposed housing, employment and mixed-use site allocations justified, effective and consistent with national policy?

3. *Core Policy CP5 sets out environmental development principles for strategic sites.*
  - a. *How does the policy relate to the strategic site allocation policies, which specify the location of the site, the density of development and set out detailed requirements including the production of a masterplan? What are the reasons for duplicating these elements?*
  - b. *How does the policy relate to other Plan policies e.g. Core Policies DCP1 and CP14 and Delivery Policies ES1, ES2 and ES3? What are the reasons for any duplication and is this justified?*
  - c. *How will the requirements A-H in the policy be measured and how will a decision-maker know if the required statement accords with the requirements? What are the benchmarks for assessment?*
  - d. *Is it clear that the policy applies to all strategic sites set out in the Plan? Are all the requirements relevant to residential and employment strategic sites and are they justified and viable?*
  - e. *Is the policy and supporting text clear on what a Construction Environmental Management Plan would contain and how will a decision-maker determine when this would need to be produced? Is this approach justified?*
  - f. *Overall, is the policy consistent with the Framework and is it clear how it relates to national planning guidance including the National Design Guide and National Model Design Code*

As highlighted in the questions above the policy overlaps with other the listed examples within the Local Plan such that there is unnecessary duplication in an effort to convey the perceived importance of such matters to the planning authority. However, by including broad and indistinct terms the policy risks being undermined as to its intentions because there is a lack of certainty relating to its provisions. Criteria 1 and 2 suffer particularly from this problem because 'appropriateness' and 'acceptability' as applied here are undefined. Similarly, the term 'low impact' is unclear in the context of the policy. It suggests a broad objective that might be included in supporting text but is not suitably precise to form part of a policy (as drafted) because there is a lack of clarity on what would be policy compliant. There is also a problem with the drafting insofar as the policy requires strategic sites to be readily accessible by foot and cycle to services and facilities etc and to be located to achieve sustainable forms of development, when such factors are a consequence, in part, of location, which will be determined by the allocating policies of the Plan.

As highlighted by question 3 c there is a lack of clarity within the parameters of the policy regarding how such provisions will be assessed. Where the drafting is vague and there are no clear means by which to judge how the criteria within the policy can be met there is a risk that the policy is rendered meaningless.

It is contended that the 12 strategic development sites that the terms of the policy relate to should include site specific measures/criteria within the allocating policies that address these principles, where appropriate, to provide a greater level of certainty and to show how the developer/applicant in each case can meet the particular provisions.

Whilst support is given to the thrust of Policy CP5, we note that the 'principles for the siting, design and construction of strategic development' section fails to acknowledge the significant role that transport plays within energy consumption, despite Government figures identifying that transport was the largest emitting sector of greenhouse gas emissions, providing 27% of the UK's total emissions in 2019 (source: DfT, Transport and Environmental Statistics 2021 Annual Report, May 2021).

Policy CP5 requires that strategic sites will “*be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distance of single purpose journeys by private cars*”.

However, the policy and supporting evidence does not identify what the term “readily accessible” means; there also appears to be lack of guidance in respect of the extent, threshold or initial requirement for providing contributions to new sustainable transport infrastructure. In this way, there is conflict with the Community Infrastructure Levy (CIL) Regulation 122, because proposals should be required to make contributions only where these are necessary to make the proposals acceptable in planning terms.

The policy should be amended to define “readily accessible” and place the definition in the context of the principles of the ‘20-minute Neighbourhood’ – places that are designed so that residents can meet their day to day needs within a 20-minute commute of their home, through access to safe walking and cycling routes, or by public transport.

The policy should also be updated to make clear that contributions/mitigation will be necessary only where justified, and that, where this is the case, should be based on the provisions of the National Model Design Code, such that priority is given to non-car / active travel solutions, with improvements to highway capacity being a ‘last resort’.

**7. Which sites are located on the best and most versatile agricultural land and is the loss justified?**

The PS30 allocation for the Hunts Grove extension comprises land falling within all grades 1 – 3b, a significant proportion of which is within the Best and Most Versatile (BMV) category (1-3a). Natural England mapping data identifies the site within a greater swathe of Grade 3 land, without providing any further detail via finer grained classification. A provisional update of the mapping data provides an enhanced degree of differentiation, which is being relied upon by Crest in preparing the Environmental Statement to support the forthcoming planning application. As set out elsewhere the land is an existing allocation within the adopted Local Plan (Policy SA4) an outline application pursuant to which is being prepared and will be submitted to the Council in 2023. The loss of BMV land associated with the allocation of the main Hunts Grove site (2005 Local Plan) and the extension (2015 Local Plan) has been assessed and examined previously and found to be acceptable in the context of the wider benefits that the allocation(s) bring to the spatial development strategy promulgated by the Local Plan. While there will be a loss of BMV land arising from delivery of the site this is not deemed to be significant in the context of BMV land within the district, or the wider county.

**12. Can the Council confirm which sites in the Plan have been allocated in a previous plan and explain why these sites have not been successfully delivered? Do the same reasons exist now, and if so, why does the Council consider the sites will be delivered during this plan period?**

As described above Strategic Site Allocation Policy PS30 – Hunts Grove Extension is an existing commitment in the adopted Local Plan. The site was allocated in 2015 and pre-application work has occurred in the period since, initially during 2018/2019 at which time an outline application was being prepared. Ongoing discussions with the landowner, who retains a development interest in a tranche of the main site (1,750 dwellings), around this time and subsequently, necessitated a pause in the progression of an application for the extension land (SA4). These discussions concluded in 2022 and an outline planning application supported by an Environmental Statement is in preparation and will be submitted during 2023. The objective is to commence development prior to 2025 as indicated in the Statement of Common Ground with the Council.

**14. Has an appropriate lead-in time and delivery rate been used when determining the delivery timeframe for each site (whether residential, employment or mixed use) and is this realistic?**

For PS30/SA4 please refer to the Statement of Common Ground.

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

For PS30/SA4 please refer to the Statement of Common Ground.

### Strategic Site Allocation Policy PS30 Hunts Grove Extension

36. *The site is allocated as an extension to the existing Hunts Grove development. It is proposed to ‘deliver an additional 750 dwellings, including 225 affordable dwellings (unless viability testing indicates otherwise)’. The policy seeks a comprehensive masterplan which demonstrates how the extension will be integrated into the Hunts Grove new community and lists 13 requirements.*
- a. *Are all the 13 listed requirements justified by robust evidence, are they sufficiently clear in their detail and do they all relate to the site allocation? Do any requirements duplicate other Plan policies and if so, why?*
  - b. *The map for the site on page 146 of the Plan provides ‘indicative information’. The local centre, primary school and safeguarded area for potential future rail halt, are all shown as being outside the site allocation, and are instead within the wider Hunts Grove development. However, these are listed as requirements to be addressed in the masterplan for the Hunts Grove extension. Can the Council provide clarification on this?*
  - c. *The provision of 225 affordable houses is subject to viability testing. Is this approach justified, does it correspond with Core Policy CP9 on affordable housing, and is it consistent with national policy? Has the affordable housing provision for this site been viability tested?*
  - d. *Some of the representations include suggested modifications to the policy wording, particularly in relation to criteria 10 and 12. Another includes a suggested new criterion on appropriate mitigation measures or replacement green infrastructure to safeguard the AONB from development pressure. Are any of these suggested modifications necessary for soundness?*
  - e. *Some representors raise other concerns relating to the development of the site, including the impact of additional traffic, the loss of green space and the effect on local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?*

Please refer to the Statement of Common Ground with the Council relating to PS30.

### Strategic Site Allocation Policy G1 South of Hardwicke

39. *The site is identified as an urban extension to Hardwicke and is allocated as a strategic housing development, including residential and community uses. The policy seeks a development brief incorporating an indicative masterplan which ‘will address’ 20 policy criteria. The site is proposed to include approximately 1,350 dwellings.*
- a. *Are the 20 criteria justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective? Do some criteria unnecessarily repeat other Plan policies?*
  - b. *Whilst the policy includes the development of a local centre and educational and healthcare provision or contributions, there appears to be no provision for other employment uses. Is this because such facilities are within close proximity and if so, what are the walking distances to such facilities from within the site?*
  - c. *Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?*
  - d. *Some of the representations raise concerns about other issues relating to the development of the site, including environmental impact. Have such factors been suitably assessed as part of the process to allocate this site?*

The policy criteria applying to Strategic Site Allocation Policy G1 should include a requirement to ensure that the access junction and improvements to the A38 corridor specified under criteria 13 and 18 are designed to include the approved A38 access infrastructure associated with Hunts Grove as part of the baseline position and to ensure that the design is entirely compatible with the approved access strategy for Hunts Grove. The implementation of development pursuant to the draft G1 allocation should not compromise delivery of the approved Hunts Grove access in any way or otherwise encumber its construction.