

## Local Plan Review – Emerging Strategy Frequently Asked Questions (FAQ)

This document sets out a series of questions that have been raised during the preparation of the Emerging Strategy document and sets out a response to each. The FAQs are being circulated to aid understanding of the context within which the document has been prepared.

### Process

1. *What process have we followed to get to this point?*

We have been following a process and timetable defined in the Local Development Scheme approved by Environment Committee in September 2017, which is a Government required document against which our performance is monitored. In broad terms, we have: identified issues and potential options for addressing them; tested them through public consultation; carried out evidence base studies including site analysis, sustainability appraisal and a transport assessment; to identify an emerging strategy that meets overall nationally defined objectives, whilst delivering on the benefits identified for the four main strategy options. The main elements of the emerging strategy document have been subject to papers discussed at meetings within the Council during 2018.

2. *Preferred Strategy or Emerging Strategy, can we call it something different?*

We can call it what we want as there is no prescribed name set out in legislation and considerable flexibility in how councils carry out initial stages of Local Plan production. However councils generally use 'preferred' as it is widely recognised and understood in the planning world as to what it means.

3. *What is the wriggle room on the timescale? Is it about running out of a 5 year supply?*

Local planning authorities must review their plans every 5 years and follow a published timetable which is monitored by Government. The Government has not been explicit about what penalties might occur if SDC fails to meet its published timetable. However, this is evidence which a third party would use at appeal to demonstrate the Council is not being proactive about future planning.

In terms of being able to demonstrate a 5 year supply, the issue is that if a Local Plan is more than 5 years old and is not based upon the new housing needs standard method, then it will be considered out of date regardless of the amount of land that it can show as coming forward.

Our current Local Plan will become out of date in November 2020. Unless, at the very least, we can demonstrate a realistic chance of having submitted the new Plan for examination by then we will start losing appeals and suffer the significant costs associated with defending refusals.

## Housing numbers

4. *How is the housing need calculated and do the 2016 based household projections alter the amount of land that we need to identify for new homes? How does this impact on the strategy?*

The calculation is based on the average household increase required over ten years, adjusted to take account of the relative cost of housing in each area. The emerging strategy paper is based on the 2014 household projections and the latest local affordability ratio (wages to house prices). The calculation is:  $1.3 \times 501 \text{ p.a.} = 651 \text{ p.a.}$  As this is an increase over the current Local Plan requirement (456 p.a.) of more than 40%, the final figure is reduced and capped at an increase of 40%. i.e. 638 p.a. This equates over a 20 year plan period to 12,760 (638x20).

The latest 2016 based household projections reduce the average household growth from 501 p.a. to 464 p.a. Once the same affordability ratio is applied, the requirement reduces to 603 p.a. (i.e.  $1.3 \times 464 \text{ p.a.}$ ). This equates over a 20 year period to 12,060 (603x20) (i.e. a reduction of 700 dwellings).

A potential reduction of only 700 dwellings is not considered significant enough to adjust the strategy at this stage, particularly as both the affordability ratio and projections will be updated again before the Plan is ready for submission.

The Government has stressed that, despite the reduction in household projections, it will consult in the autumn on adjusting its method to ensure that the overall numbers of new houses built nationally remains the same.

5. *What is the implication of too much land being allocated in the final submission version of the plan?*

It is better to have too much land allocated than not enough. The Plan will be sound as the housing target is a minimum not a maximum. Too little land allocated will result in delay or rejection of the plan. In 2014 the Local Plan Inspector delayed the inquiry for 6 months for the Council to increase its allocations to meet a higher housing target of 11,400. This delay was significant in the outcome of a number of appeals.

6. *What happens if we do not meet the prescribed housing numbers?*

It is better to have too much land allocated than not enough. The Plan will be sound as the housing target is a minimum not a maximum. Too little land allocated will result in delay or rejection of the plan. In 2014 the Local Plan Inspector delayed the inquiry for the Council to increase its allocation to meet a higher housing target of 11,400. It also opens up the risk of not being able to demonstrate a 5 year land supply with the accompanying impacts.

## Dispersal options

7. *What were the results of the consultation on the issues and options stage? (Headline messages)*

Each chapter of the emerging strategy paper summarises the results of public consultation. In terms of the strategy for accommodating growth, Option 1 (concentrated growth) was the most popular individual approach, with broadly twice the support of the next most popular option. Of formal written responses made, Options 2-4 received broadly similar levels of support. However Option 3 (dispersal) was the next most popular strategy based on informal responses made at exhibition locations. A number of responses suggested hybrid options including elements of the four main options. Other suggestions included focusing development along major transport corridors, close to employment areas and on brownfield land.

8. *Can a more dispersed approach be used in order to remove the need for some allocations?*

Yes, but the more the final hybrid strategy option departs from the concentrated growth option and more towards a dispersed option, the more the strategy is open to criticism for not reflecting the views of the public and the results of sustainability appraisal and the transport assessment that clearly identify concentrated growth as the most sustainable and deliverable approach.

9. *How does the strategy deal with opportunities for dispersing growth to more rural areas and should we be dispersing more?*

The strategy seeks to allocate sites for development at locations other than the tier 1 towns (Cam, Dursley, Stonehouse, Stroud) – at tier 2 settlements (Berkeley, Minchinhampton, Nailsworth and Painswick) and at some tier 3 settlements Brimscombe, Kings Stanley, Kingswood, Leonard Stanley, North Woodchester and Thrupp with links to Stroud and Wotton-under-Edge, where growth potential is limited by environmental constraints.

The strategy also provides more opportunities for development outside current settlement development limits:

1. up to 20 dwellings on sites immediately adjoining SDLs at Tier 1-3 settlements to meet specific identified local development needs (i.e. exception sites for first time buyers, self build and custom build housing, rural exception sites) subject to being able to overcome environmental constraints;
2. At Tier 4 and 5 settlements, in addition to rural exception sites, the development of small sites of up to 10 dwellings outside SDLs in the interests of maintaining social sustainability, provided that the policy is supported by the local community through the making of a Neighbourhood Plan.

Finally, the Plan will include a small sites windfall allowance to take account of small sites coming forward across the District.

There are opportunities to allocate further land at other tier 3a or 3b settlements. However, some of these settlements have no identified sites for development. In others, the only site options available have constraints. The total available housing capacity from these sites is relatively modest and would not offset the loss of one of the larger allocations.

10. *What are the pros and cons of a more dispersed approach?*

The sustainability appraisal (produced by consultants) scored the performance of all of the options against a set of sustainability criteria. The following table summarises the potential positive and negative impacts of these options.

**Table 1: Summary of sustainability effects for the Future Growth Strategy Options for Stroud Local Plan**

SA Objective	Option 1: Concentrated development	Option 2: Wider distribution	Option 3: Dispersal	Option 4: Focus on a single growth point
SA 1: Housing	++	++/-	++/-	++
SA 2: Health	++/-	+/-	+/--	++/--?
SA 3: Social inclusion	++/-	+/-	+/--	++/--?
SA 4: Crime	0	0	0	0
SA 5: Vibrant communities	+/-	+/-	+/-	+/-
SA 6: Services and facilities	++/-	++/-	+/--	++/-
SA 7: Biodiversity/geodiversity	-?	--?	--?	--?
SA 8: Landscapes/townscapes	-?	--?	--?	--?
SA 9: Historic environment	+?/--?	+?/--?	+?/-?	+/-?
SA 10: Air quality	+	+/-	-	+/-
SA 11: Water quality	-	--	--	0
SA 12: Flooding	+/-	-	--	-
SA 13: Efficient land use	+/--	--	--	--
SA 14: Climate change	+	+/-?	-	+/-?
SA 15: Waste	+?	0	0	+?
SA 16: Employment	++/-	++/-	+/--	++?/-
SA 17: Economic growth	+/-	+/-	+/-	++?/-

The sustainability appraisal highlights the main findings of options 2 and 3 which advocate a more dispersed approach:

Conversely Option 2 and Option 3 would result in a greater spread of development throughout the district at the smaller towns and more rural villages. These locations are currently less accessible and provide access to a lower number of key services and facilities. Furthermore the wider dispersal of development through the district would place a higher level of development in close proximity to potentially sensitivity biodiversity and geodiversity designations while also resulting in adverse impacts on the established character of the more rural villages and the AONB. Both of these options would make use of a higher number of smaller development sites meaning that issues relating to viability<sup>1</sup> may be more likely to result in relation to the delivery of affordable housing. It is also considered government funding which might otherwise be used to help to address connectivity issues in the district would be less likely to be secured at the smaller sites which these options would put forward.

The main benefits of dispersal identified in the SA are the potential benefits to the vitality and viability, liveability of the more rural villages as new development could help to promote regeneration and enhancement of community identity in these villages.

11. *Can a dispersed option deliver 12,760 homes over a 20 year period?*

Using the pool of sites at tier 2 and 3 settlements promoted through the SALA / Local Plan process at smaller settlements it has not been possible to identify sufficient capacity to deliver the Plan requirements. This means that either a dispersed option has to also include large sites at existing settlements or new settlements, or a further process of identifying sites at smaller settlements needs to be undertaken. If this latter approach is taken this will significantly extend the Plan production time. It is also extremely unlikely that the number of sites required will be identified or that the sites required will be free of major constraints.

Putting aside the logic of a distribution strategy that reflects proximity to facilities and services or the suitability and availability of actual sites, we have calculated what % growth would be required at all settlements to spread the numbers equally and deliver the numbers required. Some have argued this is a “fairer” approach. The figures demonstrate that a 10% increase in the number of houses at each settlement would not deliver the target required. A 15% increase would deliver the growth required with some additional flexibility if some sites did not come forward. The following table illustrates the new housing that would need to be accommodated at each settlement over and above existing permissions:

Stroud	1774	Leonard Stanley	110
Cam	593	Newtown & Sharpness	105
Stonehouse	515	Frampton on Severn	90
Dursley	468	Kingswood	87
Nailsworth	404	Whiteshill & Ruscombe	75
Wotton Under Edge	345	Uley	73
Hardwicke	288	Upton St Leonards	79
Minchinhampton	209	Whitminster	59

Manor Village	188	Bisley	56
Painswick	190	Slimbridge	52
Chalford	183	North Woodchester	45
Brimscombe	157	Oakridge Lynch	39
Berkeley	144	Coaley	40
Kings Stanley	117	Amberley	36
Eastington	110	North Nibley	36
		Horsley	27

The exact calculation has not been made for smaller settlements but assuming an average of 100 dwellings at each of the following settlements, in addition, such a dispersal would require around 15 dwellings to be found on sites at the following settlements: “Old” Bussage, Eastcombe, Newport, Selsley, South Woodchester, Arlingham, Box, Brookthorpe, Cambridge, Cranham, France Lynch, Haresfield, Hillesley, Longney, Middleyard, Nymphsfield, Randwick, Saul, Sheepscombe, Stinchcombe, Stone

The table demonstrates that:

- Cam and Stonehouse, even under a dispersal option, would still be required to deliver large scale additional growth because of their existing size;
- Stroud and Wotton under Edge, despite their landscape constraints would have to find significant number of new homes;
- other locations such as Painswick and Minchinhampton within the AONB would require major development over and above levels set in the emerging strategy;
- significant levels of growth at small settlements (e.g. Amberley, Whiteshill & Ruscombe) would need to be found, despite the fact that no appropriate sites have yet to be identified.

*12. Does the emerging strategy satisfy the NPPF requirement for 10% of the housing supply to be on sites no larger than one hectare?*

The exact requirement is to “identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.” (NPPF, para. 66a)).

The identified supply of sites of no more than one hectare in Stroud District (as at 1 April 2018) is made up of the following:

Sites of less than one hectare with permission	895
Sites of less than one hectare on brownfield register (without permission)	246
Emerging sites in Local Plan	120

Windfall allowance* (75x17)	1275
TOTAL	2536

\*estimate

As a percentage of the overall requirement of 12,760, sites of no more than one hectare make up 19.8% of the potential supply.

13. *Can we use the policy approach as per Cotswold District Council's recently adopted plan policy DS3 (which counts as windfall development) in non-designated settlements in order to enable communities to grow and reduce the need for concentrated growth locations?*

In terms of allowing windfall development within existing rural settlements, this criteria based policy is very similar to our Local Plan policy HC1. Our Local Plan includes a windfall allowance to take account of developments that take place, similar to CDC.

In terms of allowing small scale growth adjacent to rural settlements, the CDC approach is a variation on options that we have previously considered. We discussed the benefits that settlement development limits have in terms of providing certainty to the planning process and the difficulties in defining appropriate criteria to manage growth adjoining the edge of settlements. As a result of that discussion we have proposed a hybrid approach that maintains settlement limits (that CDC doesn't have) and supports small scale growth adjoining SDLs, but only where the community supports this approach through a neighbourhood plan. We intend to consult parish councils through the emerging strategy consultation process to see if some of them are prepared to support small scale growth without going through a neighbourhood planning process. The main benefit of this approach is that it provides an opportunity for specific communities to support a case for social sustainability rather than imposing it on all settlements through the strategy (as CDC does).

It has been questioned whether CDC will be able to control proposals effectively on the edge of settlements using this policy, although the blanket AONB designation helps CDC to some extent. In Stroud, the absence of such a clear cut designation within the Severn Vale and in villages near to main towns in particular makes it highly likely that under such a policy some small villages may be subject to multiple applications for small scale development, potentially resulting in cumulatively unsustainable levels of growth.

14. *How is windfall counted towards the overall target (ref CDC DS3). What could we assume would come forward taking in to account that we already have settlement boundaries that allow development within?*

The Cotswold Local Plan includes a windfall allowance equivalent to 95 dwellings a year. However, this is made up not only of small sites subject to Policy DS3 but also small sites from within the 17 principal settlements. The actual figure is based on evidence of historic rates achieved.

Our current Local Plan includes a windfall allowance of 58 dwellings a year but only based on small scale development within tiers 1- 3 settlements. We could include a wider windfall allowance to cover small scale development at smaller villages. However, windfall rates are determined having regard to historic rates and to compelling evidence that they will provide a reliable source of supply. We do not have the evidence to support a windfall rate above historic rates and a change of policy to allow development outside SDLs has not been reflected in past delivery. However, based on historic data, an additional figure of up to 22 houses per annum (374 total) could be put forward as an additional windfall allowance to take account of sites outside of SDLs and at smaller settlements.

The critical issue is whether there is a case for a windfall allowance to be an essential component in reaching the minimum housing requirement, or whether it provides an additional supply to exceed the minimum requirement and to provide flexibility or “headroom” in case any of the allocations do not come forward as expected. It is noteworthy that although the Cotswold Local Plan includes a windfall allowance, this is not essential to meet the minimum requirement. The allocations and permissions together achieve the minimum requirement. The windfall allowance provides an additional supply in excess of the minimum requirement.

<b>CDC housing requirement</b>	<b>8400</b>
Allocations	2377
Commitments (permissions)	6046
Windfall allowance	1191
<b>Total anticipated supply</b>	<b>9614</b>

We consider it inadvisable to rely on windfall to achieve only the minimum requirement especially so early in the process when we do not know the final housing requirement or whether all of the potential sites can come forward as expected.

### **Infrastructure and delivery**

15. *How do we ensure that sufficient infrastructure provision is made? (schools, doctors, public transport)*

This is partly a matter of ensuring that the strategy identifies growth at those settlements where there is already infrastructure able to accommodate the growth or in new settlements where the amount of development can fund the new infrastructure required. Once the strategy has been identified, it is then a case of consulting stakeholders and undertaking studies to ensure that this growth is planned for in the future investment strategies of service providers in a timely manner to facilitate delivery.

16. *Does the fact that we can charge CIL mean that the dispersed growth will deliver the same level of infrastructure growth as concentrated growth?*

No, because there are economies of scale that can be achieved from concentrated growth in terms of delivering infrastructure i.e. more houses benefit from access to the same new facilities; and large scale growth has greater opportunities to bid for and receive public funding e.g. through LEP/HIP/RIS funding).

The level of CIL is set not by the cost of infrastructure needed but by a general assessment of what is viable to achieve. It will not pay for all the infrastructure needed. In addition, 15/25% of CIL goes directly to parish councils and SDC therefore cannot guarantee that CIL funding raised will all go towards essential infrastructure.

*17. Major developments appear to rely on significant improvements to the motorway network (e.g. J14) which may not be possible/deliverable?*

The high level transport assessment (carried out with GCC and Highways England) shows that all options for growth depend upon significant improvements to the road network. Dispersing growth to smaller settlements does not resolve this issue – it simply reduces the potential to attract Government funding and makes mitigating the cumulative traffic impacts less likely due to viability matters.

**Assessment of sites**

*18. How are sites included for consideration and what is the process for their exclusion or inclusion?*

Initially, over 350 sites were identified for assessment during the Strategic Assessment of Land Availability (SALA) process in 2016/2017. All sites were subject to an assessment of their suitability, availability and achievability using a nationally defined methodology.

The “best” sites outside of settlement limits were identified in the Issues and Options document in 2017 and subject to public consultation.

New sites put forward during this 2017 public consultation were subject to the SALA assessment process in 2018.

All issues and options sites and new sites that passed the SALA process were then allocated to one or more of the strategy options and these strategy options were tested.

Sites that were compatible with the emerging strategy were then further assessed for their potential capacity and for further evidence of availability (i.e. they are being actively promoted).

*19. How are sites from the brownfield register included in achieving the 12760?*

The brownfield register consists of two types of sites: 1/ sites with permission; and 2/ sites without permission. All of the sites with permission have been counted towards delivering the 12760. Of the sites without permission, only those of sufficient size and

where there is evidence that they are likely to come forward have been allocated. However, smaller sites which are not being allocated can count within any windfall allowance.

### **Specific sites and locations**

#### *20. Could Cam/Wisloe sites appear as continuing ribbon development?*

The historic pattern of development within the District reflects the importance of communication corridors (A38, A46, A419, A4135). The characteristic topography of incised valleys and estuarine environs with associated flood risk and the higher landscape designation of the AONB act to constrain potential locations for growth to linear development. It is therefore not surprising that the most accessible and least constrained locations within the District reflect existing road and rail corridors close to existing settlements and recent areas of growth.

Ribbon development has connotations of uncontrolled growth along roads at some distance to local facilities. In this case, growth would not be uncontrolled but planned for, contained within defined boundaries and with landscaping to prevent merging with Cambridge or Slimbridge or extending into countryside. The site would include a local centre to ensure all residents are close to facilities and an employment area to provide job opportunities for local people.

#### *21. Could we substitute the site at Whaddon for Wisloe and reconsider this issue at a later date if Whaddon is required to meet Gloucester's needs?*

A more logical approach would be to continue with the current proposed strategy and take stock once the site study looking into Gloucester site options has concluded in 2019. At that stage, if Whaddon or South of Hardwicke are not needed to meet Gloucester's immediate needs, then there is the potential to review how these sites might contribute to future needs and whether there is merit in them coming into the Stroud Local Plan with consequential changes to the strategy.

The site at Whaddon is clearly functionally related to Gloucester rather than any settlement in Stroud and in a peripheral location in terms of meeting housing needs arising from within Stroud district. Growth here would do little to deliver jobs for Stroud residents or to support the vitality and viability of local centres within the district and would be likely to put strain on the existing A4173 and M5 Junction 12 for future residents seeking to access jobs, services and facilities within Stroud. Wisloe is in a more central location for meeting Stroud's housing needs, growth would bring additional jobs and support and enhance services available in Cam and Dursley and the local area and there are greater opportunities for utilising public transport (A38 bus services and Cam & Dursley railway station) and dispersing trips by private car. There does not appear to be a logical planning reason why Whaddon is a preferable site for meeting Stroud's needs.

The strategy already envisages around 20% of the future housing supply for Stroud being met within the Gloucester fringe area, due to existing commitments at Hunts Grove. Allocating land at Whaddon would increase that to around 35% which would be a very large proportion considering the peripheral nature of the location to most of the Stroud population.

The site at Whaddon has already been identified by the Joint Core Strategy Inspector as a potential site to meet Gloucester's unmet needs and may be identified in a site study to be completed during 2019 as suitable and available. The current Local Plan and the Council's Statement of Cooperation with the JCS authorities commit this Council to allocate land within the district if required to meet Gloucester's unmet needs. We believe it would be unjustified to propose a course of action where there is a high degree of certainty that a key component of any Stroud strategy would have to be removed. This approach would increase uncertainty in the short to medium term and would likely lead to additional work, cost and ultimately delay.

22. *Could development at Sharpness simply result in costly commuting to work for those least able to afford it?*

A new settlement option at Sharpness offers the potential to create housing, employment and facilities together in a sustainable manner that could address modern lifestyle and transport needs. Previous allocations in Local Plans have not delivered a step change in growth and accompanying infrastructure. This will be a challenge but large scale growth requirements require more innovative approaches. The Government is keen to support such approaches and has recently published a prospectus asking for developers and local authorities to put forward proposals to unlock public funding.

23. *Could we increase the likely delivery rate at Sharpness as positive support for the concept of a new settlement?*

Whilst a new settlement at Sharpness will have an eventual capacity of up to 5000 dwellings, it is not realistic to plan for this amount to come forward by 2040. A new settlement takes time to plan properly and for infrastructure to be put in place in good time to avoid adverse impacts on existing roads and existing communities.

The paper identifies the delivery of 2400 dwellings by 2040 which is based on construction commencing in 2026 and an annual average delivery rate of 150 houses from 2027 to 2036 and 250 from 2036-2040. This is consistent with the results of the Strategic Assessment of Land Availability (SALA) 2017. The housing requirement set out in the final Local Plan will be a minimum, so there will be no penalties if this number is exceeded.

Whilst the concept of a new settlement at Sharpness is supported, the overall strategy has been developed to spread growth across a range of small, medium, large and very large sites at a number of different locations to mitigate against risks associated with changes in economic cycles, delays due to site specific circumstances and because the creation of new settlements is an ambitious undertaking. Putting pressure on Sharpness

to deliver more within the Plan period increases the potential impacts from these risks and the danger that the minimum requirement is not met.

24. *Given the sites promoted at Whitminster are without any clear harm can they be accommodated within an emerging strategy*

The first consideration is whether Whitminster is an appropriate location for growth. There is an opportunity to identify further tier 3 settlements for growth, but other settlements sharing a similar profile as Whitminster would also have to be included. You cannot “pick and choose” settlements unless there is a coherent strategy behind it.

If Whitminster were to be identified as a suitable settlement for further growth, the scale of development would then need to determine how many of the potential sites may be appropriate to deliver its enhanced role whilst conserving its village character.

**Planning Strategy  
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