

HEARING STATEMENT ON BEHALF OF COTSWOLD HOMES

Stroud Local Plan Review Examination Matter 2: Spatial Strategy and
Site Selection Methodology

JBB9074.C8265

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February 2023

REPORT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
1	Matter 2 Statement	MSG	CAF	CAF	February 2023

Approval for issue

Cameron Austin-Fell [CAF] 13 February 2023

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MATTER 2: SPATIAL STRATEGY AND SITE SELECTION METHODOLOGY

This Statement has been prepared by RPS on behalf of Cotswold Homes LTD (“CH”) in respect of their land interests on Bath Road, Leonard Stanley.

Issue

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?

Matter 2 Vision and Objectives

Q1 Does the Plan set out a suitably positive and realistic vision for the future District as a whole?

- RPS note that in relation to Housing, the Vision and Objectives of the Plan are set out on Page 19 of the submission plan [EXAM CD1]. Whilst the Vision is positive in tone, RPS do not consider that it is a realistic vision for the reasons set out below. Clearly, the authority area is constrained by local factors including the topography of the District and the coverage of the AONB, however the vision (and corresponding priority issues) does not strike an appropriate balance, particularly in relation to the vision for housing. As part of this vision, there is references to the delivery of ‘vibrant and diverse communities...safe and secure...where young people have opportunities’ (blue text on p19 refers). The preceding housing priorities on page 13 of EXAM CD1 sets out that (priority 9) that the plan will meeting the District’s identified future housing needs. This does not set out what kind of need, inferring that both market and affordable need will be met. As set out in the Local Housing Needs Assessment, a significant proportion of Stroud’s younger cohorts (aged 16-34) are unable to afford market housing, and would only be able to access affordable products within the District. This is set out in Figure 48 of the Local Housing Needs Assessment [EXAM EB10, P79] replicated below.

Figure 48: Assessing affordability by household type and age (Source: Census 2011 and DWP Stat-Xplore – Housing Benefit – Data to March 2018)

Percentage unable to afford market housing	Under 25	25-34	35-44	45-54	55-64	65+
STROUD						
Single person household	34%	14%	25%	22%	26%	24%
Couple family with no dependent children	14%	4%	9%	7%	6%	9%
Couple family with 1 or more dependent children	57%	25%	11%	6%	6%	14%
Lone parent family with 1 or more dependent children	70%	73%	51%	36%	35%	35%
Other household type	40%	27%	42%	22%	16%	10%

- As set out in Policy CD9, the Council identify an affordable housing need of 424 dwellings per annum; a significant figure in the context of the overall housing need. It is clear that the Council will

not be able to meet that affordable need in full, and currently the vision is not correctly framed in the context of what will actually be achieved.

Q2. 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 of Sharpness and Wisloe identified and was the process robust?

3. No, RPS consider that a significant reliance on Large Strategic Development Sites is both unrealistic, and damaging to the sustainability of established settlements. As set out in the Submission Plan [Table 3 of **EXAM CD1**, Page 34] around 8,080 or 78% of the Council's supply is forecast to come forward from significant allocations. The Strategic Development Sites are not simply 'major' developments, but urban extensions, new settlements and sites such as Sharpness Docks that require considerable remediation. Such large Strategic Sites require significant infrastructure to be delivered as well as a considerable lead in time for development to commence, as such these will not contribute to the immediate needs or of the district within the first 5 to 10 years of the Plan. The trajectory contained on Page 306 of EXAM CD1 is not realistic as demonstrated further in RPS' response to Matter 7.
4. The Council's approach to '*putting all its eggs in one basket*' presents considerable risks in terms of delivery within the plan period, taking a position that RPS considers is both incredible and absent of solid grounding. Whilst RPS understands why the Council might want to steer development to these growth locations, the strategy would see very limited growth to the existing hierarchy of settlements, making it questionable who stands to benefit from the growth, and whether growth will be delivered in the area where it is needed.
5. RPS consider that the Council should provide a more balanced approach to delivering housing by allocating a broad mix in size, type and location of housing sites, catering for affordable, elderly and other needs of the district as well as for market housing need of the rural areas. This would align with the Spatial Strategy of the Plan for the Local Service Centres where lesser levels of growth are proposed to be delivered to at the villages of Brimscombe & Thrupp, Eastington, Frampton-on-Severn, Kings Stanley, Kingswood, Leonard Stanley, North Woodchester and Whitminster which have a range of local facilities and already benefit from good transport links, or potential to develop better transport links.

Q7) Has it been clearly demonstrated how the SA, HRA, Infrastructure, Viability and other relevant evidence have influenced the location of development and the over strategy during plan making?

6. As explained in response to Q2-7 (and in the Matter 1 Statement), RPS does not agree that relevant evidence has influenced the location of development and the overall strategy during the preparation of the Plan.
7. It should be clear how the evidence has informed the proposed allocations however there are a number of inconsistencies in how sites have been assessed as discussed in Matter 1. In particular how adverse effects are dealt with (**EXAM CD3, Table 5.2 Summary of likely sustainability**

effects of local site allocations pg122 SA) and which sites have advanced to draft proposed housing allocations.

Q15b. 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?

8. RPS observe that there are strong grounds for revisiting whether the Council has correctly arrived at a robust development hierarchy, with reference to the evidence base. Here, RPS raise concern in the way which the Council treat the settlement of Leonard Stanley. Leonard Stanley is a **Category Tier 3a Settlement** (Core Policy CP3, page 55 - Accessible Settlement with Local Facilities) where additional growth is proposed as part of the Plan, namely through proposed allocations PS16 and PS42 which in combination will deliver 40 new dwellings. This is a modest level of growth given the size of Leonard Stanley and the adjacent settlement of Kings Stanley (no allocations planned), which, effectively operate as a single settlement. Other similar **Category Tier 3a Settlements** are proposed to deliver considerably more development ranging from 50 dwellings at Kingswood and Whitminster to 190 dwellings at Brimscombe & Thrupp.
9. The allocation of new housing in Leonard Stanley demonstrates that SDC consider it is an appropriate location for development to meet local needs. However, RPS considers that Leonard Stanley and Kings Stanley (“the Stanleys”), have not been appropriately assessed as part of the evidence base and should be reconsidered as a single settlement. The Council’s evidence base for the assessment of settlement role [EXAM EB72] is currently some five years old, and by definition, would benefit from an update. RPS notes here that if combined, the Stanley’s would support a population observed at a number of higher order Tier 2 settlements (Table 1 of **EXAM EB72**, P12), and would also benefit from an enhanced array of services when considered as a single entity. RPS notes that the Stanley’s would be unlikely to currently support an employment base, as indicated by the Council’s evidence but would stand to utilise capabilities in neighbouring Stroud. As expressed in the Council’s evidence [**EXAM EB72**, Table 5, P30], the Stanley’s have the potential to see increases in accessibility and act as ‘dormitory’ settlements, capable of accessing employment by proxy to nearby areas (Paragraph 4.47 refers). RPS is of the view that there would be good grounds for re-appraising the Stanleys as a ‘Tier 2’ settlement, with its role within the plan to be given further reconsideration on this basis.

Q21 a. Is development outside the proposed SDL necessary to meet identified needs and if so, why are site allocations in these locations not being proposed or boundaries moved to accommodate this? Or will such development be ‘exception sites’?

10. RPS consider that development outside of the SDL is necessary for the ability to meet housing needs of villages where it arises, but furthermore, in the pursuance of maintaining a deliverable supply of land, as set out in our Matter 7 statement.

11. It is not necessary however for the release of such sites to be 'exceptional' as stated by the Council in Policy CP3. This type of wording is generally only reserved for matters of particular importance such as the stringent tests for the release of Green Belt land, as echoed in Paragraph 139 of the NPPF. It should not be applied for windfall greenfield sites which may become available for development during the Plan period. Moreover, if the Housing Policies of the Plan became out of date or, if the supply falls below an acceptable level to meet local needs, it would be important for the Council to have a mechanism in place to retain some flexibility to bring forward Reserve Sites if the delivery of the proposed allocations is not in line with the expectations. This is something that other Local Plans introduce with a Reserve Sites Policy which is triggered when specific criteria have been met, such as the absence of sites coming forward on Strategic Allocations as anticipated.
12. It is clearly demonstrated within RPS' response to Matter 7 that the trajectory presented by the Council is overly optimistic in respect of supply in the first 10 years of the plan. RPS also demonstrate why it is likely a significantly longer lead in time will be necessary and why sources of supply, mainly from strategic allocations, will deliver much later, with some growth outside the plan period.
13. A further point to note here is the Council's current plan operates with a provision made for windfall sites – with an expectation of 75 dwellings per annum. Some 1,275 dwellings over the plan period. With tightly drawn SDL's the Council has not provided sufficient justification that this need can be met within those boundaries, leaving the question of how this need will be met over the plan period.

Q28. Has the site selection process been suitably informed by relevant studies/assessments and site constraints, and has it included a robust assessment of development impacts?

14. Whilst RPS broadly considers that the Council has looked at the right variables for considering individual site suitability, it is not clear how a comparative assessment has informed the most appropriate and sustainable selection of sites.
15. Taking Leonard Stanley as an example, RPS observes that the Council has not taken forward the proposals which conform the strongest to the Council's evidence – namely the Sustainability Appraisal ("SA").
16. The SA submitted with the plan seeks to capture the various stages of the strategy development, including an assessment of those sites with development potential to be assessed for allocation. The full summary matrices are included within **EXAM CD3b**, which RPS turns to. For Leonard Stanley, Table A5.6 (page 213) sets out the two development sites proposed by the Council, which indicate a mixed presentation of scores, including three 'major adverse' impacts, denoted in a dark shade of red. Although the discounted options are not presented alongside the preferred sites, they are presented earlier at Table 5.1 (Page 199). Here we observe that there are five other discounted sites for Leonard Stanley, and whilst two of them attract a similar level of major adverse impacts, three record less harmful impacts.

17. RPS considers the appraisal of sites around Leonard Stanley, however it may also be the case that the opacity of the site selection process extends into other areas of the Council's assessment. RPS considers that the assessment cannot be said to be robust, or informed by an adequate level of evidence base.

Q27. Overall, has the process robustly identified and assessed all relevant sites?

No. As observed above, RPS does not consider the assessment process has been approached in a clear or transparent way. Whilst RPS considers that the plan has allowed the capture of potentially deliverable land, the treatment of the sites under the Council's assessment has not been clearly approached.