

## Stroud District Local Plan Review Examination

### Response to Matter 6a: Site Allocations – General Questions

For and on behalf of: Charterhouse Strategic Land

February 2023

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#### Introduction

1. This Hearing Statement is for and on behalf of Charterhouse Strategic Land (CSL) (representor no. 865) with respect to the Stroud District Local Plan Review (SDLPR) submitted for Examination by Stroud District Council (SDC).
2. It is concerned with **Matter 6a** (Site Allocations – General Questions) as set out in the Inspectors' Matters, Issues and Questions (MIQs) (Examination document reference: **ID-05**).
3. The Hearing Statement has been prepared on the basis:
  - a) that the Inspectors have received and reviewed in detail the representations previously submitted to the Stroud District Local Plan Review Pre-Submission Draft (May 2021) on behalf of CSL.
4. This Statement does not repeat previous representations, which must be read in conjunction, but makes points relevant to the Matter in question in the following sections.

#### Response to Issue 6

*Are the proposed housing, employment and mixed use site allocations justified, effective and consistent with national policy?*

**Question 4:** *Site allocations that include housing development specify dwelling capacity figures.*

- a) *Is it clear how these have been determined for each site allocation? Are they based on the suggested yields from the SALA, or have they been updated to take account of more recent developer evidence or detailed assessments?*
5. The calculation of dwelling capacity figures is not clearly explained in the SDLPR. The figures appear to be from suggested yields in the SALA but there appears to be a disconnect between the evidence base and the allocations in the Plan. For example, PS41 (Washwell Fields, Painswick) has an indicative yield of 10 – 15 dwellings in the SALA (2017) (**EB19**) apparently taking into consideration landscape and other factors relevant to the site, but a proposed site allocation in the policy of up to 20 dwellings.
6. The extent to which the site allocation dwelling capacities are reliable and based on appropriate evidence is not therefore clear to CSL.
- b) *Is the scale of housing for each site allocation justified having regard to any constraints and the provision of necessary additional infrastructure?*
7. As per the above answer, the extent to which the site allocation dwelling capacities are reliable and based on appropriate evidence, including the provision of any necessary additional on-site (or off site) infrastructure, or constraints is not evidenced or clearly justified in all cases. The Inspectors are referred to CSL's separate response to Matter 6i (the Cotswold Cluster Site Allocations; PS41, Washwell Fields, Painswick) with respect to concerns as to the extent to which that proposed site allocation has had adequate regard and undertaken sufficiently detailed analysis of development constraints.
- c) *Do the site allocations achieve appropriate densities and make effective use of land, in accordance with the Framework?*
8. This is for SDC to answer.
- d) *What are the reasons for using different terms for setting out the number of dwellings within each policy, such as 'comprising', 'comprising up to' and 'comprising approximately'? Is there a particular explanation as to why some*

*sites are restricted by an 'up to' number and is this approach consistent with national policy?*

9. This is for SDC to answer.
- e) *Overall, is the development density and capacity for each individual site justified?*
10. No, for the reasons set out above and with reference to site PS41 (Washwell Fields, Painswick) as set out in CSL's separate response to Matter 6i (The Cotswold Cluster Site Allocations).

**Question 13:** *The site allocation policies refer to the production of masterplans and/or development briefs but no further details are set out.*

- a) *Does the Plan clearly define what masterplans and development briefs are required to be informed by and what they need to include? Is this set out in policy?*
11. No, the Plan does not effectively define what masterplans / briefs are required to be informed by and what they need to include.
12. With regard to PS41, for example, the text at page 220 only explains that a masterplan will detail "*the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner*". No other specific information or explanation is provided in the Plan to direct the proposed masterplan.
- b) *Is it appropriate for every site allocation to require a masterplan and/or development brief, particularly the smaller sites? Is this justified and proportionate to the scale of development?*
13. This is for SDC to answer.
- c) *Is the process by which the masterplans and development briefs would be approved by the Council, clearly defined in the Plan? How long would this process take? Are they to be approved before decisions on planning*

*applications are made? If so, what impact, if any, would this have on site delivery timescales?*

14. This is for SDC to answer, however CSL consider that the process for approval is not defined and therefore the length of time for preparation is uncertain.
15. There is no clarity as to whether a masterplan / brief needs to be in place prior to determination of a planning application for the site in question (although it would be pointless to prepare a masterplan after the preparation and determination of a planning application), so in that case there could be significant impacts on the delivery certainty and timescales for sites which would also need to be factored in to the Plan's overall housing and employment land development trajectory (which is absent in any detail from the SDLPR (the delivery trajectory at page 306 of the Plan is not adequately detailed to show when each proposed site allocation is anticipated to be delivered).

*d) Has the proposed delivery of each site taken appropriate account of the timescales for producing and approving masterplans and development briefs, particularly for those sites to be delivered during the first five years from adoption, and the larger or more complex sites?*

16. There is no identified delivery timescale for the production and approval of masterplans / briefs and no indication in the SDLPR's delivery trajectory when all of the proposed sites are expected to come forward.

**Question 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?*

17. Appropriate lead in times, delivery rates and timeframes are difficult to understand for each site in the absence of a consolidated housing trajectory for all of the proposed sites. It is not possible, therefore, to draw conclusions as to whether the delivery rates, etc. are realistic or justified.
18. With regard to the assessment and evidence for site PS41, CSL have raised concerns as to the realistic deliverability / developability of the site and note that

there is little evidence available in the SDLPR or its evidence base to explain the expected timeframe for development.

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

19. No, for the reasons set out above and with particular regard to CSL's objections to site PS41.

### **Making the Plan Sound**

20. The Plan requires a detailed housing trajectory including all proposed housing site allocations and taking account of appropriate lead in times (factoring the production of site masterplans / development briefs; realistic delivery rates and phasing).
21. Greater flexibility and resilience should also be built in to the Plan with the identification of additional housing sites and allocated (including in Painswick in the Cotswold Cluster) in order to provide sufficient certainty of deliverability over the plan period.
22. The need for site masterplans / development briefs should be clarified in the SDLPR with more robust information set out as to the expectations for these documents, the process and responsibilities for their preparation and the extent of the detail required. It may be appropriate for the Plan to identify (in conjunction with a detailed housing trajectory) which sites would actually benefit from the production of a site masterplan and why.