

Stroud Local Plan: Examination in Public

Matter 2 – Spatial Strategy and Site Selection Methodology

Hearing Statement by Ridge and Partners LLP on behalf of Newland Homes

February 2023

Stroud Local Plan: Examination in Public

Hearing Statement – Matter 2 (Spatial Strategy and Site Selection Methodology)

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?

Spatial strategy

2.4 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’s decision as to why this development distribution option was selected, sufficiently clear?

- a. We consider that elements of the spatial strategy are not justified. Our objections to the spatial strategy are primarily focused on the approach to testing of reasonable alternatives and how the SLP addresses the future growth of Gloucester.
- b. This has led to an unjustified safeguarded allocation for the site to meet Gloucester’s needs.

Criteria Used to Select the Preferred Allocations

- c. Paragraph 2.4.14 of the Assessment and Selection of Sites Topic Paper (EB9) explains the authority’s view on whether Whaddon might be allocated to meet the needs of Stroud District if it were not needed to accommodate growth from the neighbouring Gloucester City. In so doing it states that:

“The Emerging Strategy Consultation Paper (p35) had highlighted that there was potential to review how the sites at Whaddon and south of Hardwicke might contribute instead to Stroud District’s future needs, should other alternative sites be preferred and/or if they were no longer needed by Gloucester. Whilst the Whaddon site is remote from any of Stroud District’s Tier 1-3 settlements and does not generally conform to the emerging growth distribution strategy, arguably the land south of Hardwicke (a Tier 3a settlement, located within the rail/A38/M5 corridor, adjacent to what will become a Tier 2 settlement in the future) could do”. [emphasis added]

- d. The first sentence in the quote above indicates that the initial starting point is that the land at Whaddon would be identified to meet the housing needs of Gloucester. Only if it is decided that the land is not required for this purpose is it then considered whether it should be allocated to meet Stroud’s future

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needs. We have a fundamental objection to this being the starting premise upon which the site was considered through the plan-making process.

- e. It would appear that Whaddon was dismissed as a location to meet Stroud's needs simply because it is remote from a settlement within Stroud that falls within Tiers 1-3 of the hierarchy. This conclusion is reinforced by paragraph 2.4.45 of EB9 which states that "*site G2 (Whaddon) was found to be a "poor" strategic fit*". No regard appears to have been given to any other important considerations such as:
- (i) the sustainability of the location and potential development having regard to the Sustainability Appraisal or any other evidence;
 - (ii) consistency of the site with the 'spatial strategy' (aka the 'development strategy headlines');
 - (iii) the proximity to and relationship of the land with Gloucester to the north – a considerably larger settlement with a much wider range of services, facilities, education and job opportunities than any town or village within Stroud; or
 - (iv) the scale of the proposed settlement and the range of services and facilities that it would itself deliver.
- f. Instead, the development potential and the contribution it could make to meeting the needs of Stroud was simply dismissed because it does not adjoin a Tier 1-3 settlement. This does not represent a justified and sound basis upon which to plan for the growth of an authority.

Ridge and Partners LLP

9 February 2023