



**REPRESENTATIONS ON THE STROUD
DISTRICT PRE-SUBMISSION DRAFT
LOCAL PLAN (REG 19 CONSULTATION)**

Land off Gunhouse Lane and Quarry Hill Farm
Fields, Thrupp, Stroud

ON BEHALF OF:

Alexandra Orchard

July 2021

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1.0 Introduction

- 1.1. Zesta Planning Ltd has been instructed by Alexandra Orchard ('the respondent') to make formal representations on the Stroud District Local Plan Review – Pre-Submission Draft Local Plan Consultation (Regulation 19) (hereafter referred to as the 'SDLPR'). This document was published for a period of consultation between May and July 2021.
- 1.2. The purpose of this representation is twofold:
 - (1) For the respondents to make their views known on the content of the strategy and policies contained within this document, having regard to the published evidence base; and
 - (2) To promote the allocation and/or inclusion of additional land at Brimscombe & Thrupp and Stroud in order to assist in meeting the housing needs over the plan period.
- 1.3. The respondent controls two parcels of land outside but adjacent to the defined Settlement Development Limits (SDL) of Brimscombe & Thrupp and Stroud. These parcels of land are known as Land off Gunhouse Lane (Site A) and Quarry Hill Farm Fields (Site B). Site A is adjacent to Stroud SDL and Site B is surrounded by Brimscombe & Thrupp SDL, although for the purposes of this representation, given their proximity to each other, we are considering these sites as part of the wider village of Brimscombe & Thrupp.
- 1.4. The Regulation 19 Consultation SDLPR notes that Brimscombe & Thrupp is considered to be a Tier 3a settlement and now considered as a single settlement in the hierarchy. The currently adopted Stroud District Local Plan 2015 considers them separately as Third Tier (Brimscombe) and Fourth Tier (Thrupp) settlements.
- 1.5. Given its defined status on the settlement hierarchy, the SDLPR acknowledges that Brimscombe & Thrupp can accommodate new housing development. However, as set out, there are discrepancies in the overall housing numbers for the District, the "existing" commitments in the settlement and also the limited scale of proposed site allocations. For the reasons set out in this representation, our view is that a greater amount of housing should be delivered over the plan period in Stroud District. In

order to meet this requirement, there will be a need to widen the settlement boundaries and site allocations at settlements such as Brimscombe & Thrupp.

- 1.6. The respondent's land provides the opportunity to make more land available for allocation in the settlement and to increase the settlement boundaries in a sustainable manner.
- 1.7. This representation starts by commenting on the proposed strategy and policies of the plan, to the extent that the respondent has an interest (Section 2). It then provides an overview of the respondent's available land for consideration as part of this consultation (Section 3). Where necessary, this submission will also cross-reference to the evidence base that underpins the SDLPR.

2.0 Representation on the Proposed Strategy & Policies

2.1. Representations are made in respect of the general housing strategy and the following policies of the SDLPR, which should be taken as constructive objectives. These policies are addressed in the same order in which they appear within the consultation document:

- Section 2.3 – An Introduction to the Development Strategy (Pages 22-29)
- Section 2.5 – Housing (Pages 33 – 36)
- Core Policy CP2 – Strategic Growth and Development Locations (Pages 52-53)
- Core Policy CP3 – Settlement Hierarchy (Pages 54 – 57) and Section 3.1 – Shaping the Future of The Stroud Valleys – Brimscombe & Thrupp (Page 75)

Section 2.3 – An Introduction to the Development Strategy (Pages 22-29)

2.2. The strategy outlines the need to deliver at least 12,600 additional dwellings over the plan period. As outlined below, we do not consider that this goes far enough towards delivering the minimum housing need within Stroud District and that additional housing numbers should be allocated to account for inevitable lapse rates, delays in delivery and under delivery. These factors often plague adopted plans and lead to an undersupply in housing and the need for early reviews of the Development Plan.

2.3. We note that the suggested Development Strategy is based upon a “hybrid” approach which incorporates various routes to delivering housing need, including site allocations, development at a small number of larger settlements and smaller allocations in some of the larger villages. Other smaller scale development is proposed to be delivered through infill developments within existing settlement boundaries.

2.4. We do not consider that the “hybrid” approach to be a robust way forward. The reliance of delivering such a large amount of housing at such few locations is a high risk strategy, as the effect of only one of those sites failing to deliver would cause significant shortfalls in delivery.

- 2.5. Furthermore, the inclusion of tightly drawn settlement boundaries (referred to as 'Settlement Development Limits' in the SDLPR), with policy worded so as not to allow any development outside them unless in exceptional circumstances, is tantamount to a blanket restriction on new housing. This prevents the ability to boost housing supply and sustainable growth, and also prevents potentially sustainable developments from coming forward, which would not be supported purely on the grounds that they are on the wrong side of the boundary line.
- 2.6. We consider that less reliance should be placed upon the main settlements to deliver so much housing and much greater flexibility should be built into the plan to allow housing to come forward at other settlements. This should either involve the removal of settlement boundaries or the rewording of policies that allows sustainable developments to come forward, which are adjacent to or in close proximity to the settlement boundaries.
- 2.7. Specifically in relation to Brimscombe & Thrupp, we note that this settlement has been identified as at Tier 3a and one with potential for growth due to its sustainable location and range of facilities and services. We also note that the proposed allocations at Brimscombe Mill (Local Sites Allocation Policy PS01 – 40 dwellings) and Brimscombe Port (Local Sites Allocation Policy PS02 – 150 dwellings) represent proportionately low levels of growth for a settlement of this size and one in such close proximity to Stroud. Either further allocations should be made at Brimscombe & Thrupp or the settlement boundary enlarged/made more flexible to encourage further growth.

Section 2.5 – Housing (Pages 33-36)

- 2.8. The Gloucestershire Local Housing Needs Assessment 2019 (September 2020) prepared as part of the evidence base to support the SDLRP notes in relation to Stroud District that (our emphasis):

Para 8 (Executive Summary) – “...if the new plan is not submitted by November 2020 then the strategic policies for housing will no longer be considered up-to-date and the applicable cap will change, which would increase the minimum Local Housing Need to 652 dpa based on current figures.”

- 2.9. This assessment and recommendation are clearly at odds with the suggestion within the SDLRP that the housing needs figure should be a minimum of 630 dpa (SDLRP Para 2.5.2). The new plan has clearly not been submitted by November 2020, hence this current consultation. Over a 20-year plan period, this shortfall equates to 440 dwellings, which is not insignificant and is of course the minimum shortfall.
- 2.10. Therefore, the SDLRP figures are based on a shortfall from the outset, which is clearly inappropriate and highlights the need for additional allocations, amendments to settlement boundaries and/or blanket restrictions outside/adjacent to settlement boundaries.
- 2.11. There are further concerns in relation to the existing housing supply calculations, which would further exacerbate the primary issue identified above.
- 2.12. Firstly, and in relation to Table 2 (Page 33), we note that the Total Commitments figure of 5,215 dwellings is taken from the Stroud District Housing Land Availability at 1st April 2020 document, which forms part of the evidence base. In relation to Brimscombe & Thrupp, this includes 135 dwellings, of which 118 dwellings are commitments from large sites (10 dwellings and over).
- 2.13. These 118 dwellings considered to be commitments, are split over the following sites:
- Ham Mills, London Road (App Ref – S.15/1751/FUL) – 100 dwellings
 - Lewiston Mill, Toadsmoor Road (App Ref – S.15/1385/FUL) – 7 dwellings
 - STB Engineering Ltd, Toadsmoor Road (App Ref – S.13/2377/FUL) – 11 dwellings
- 2.14. Of these commitments forming part of the SDLRP supply, only Lewiston Mill is currently delivering dwellings, with only 7 remaining (net). Both sites at Ham Mills and STB Engineering Ltd no longer benefit from an extant planning permission, which have both since expired without implementation. There are also no new applications under consideration on these sites. Therefore 111 dwellings of the 135 dwellings (ie. 82%) stated as being commitments in Brimscombe & Thrupp are clearly undeliverable and should be removed from the supply.
- 2.15. This is for Brimscombe & Thrupp only and therefore, this would raise concern over the supply figures for the other settlements in the District.

- 2.16. It is acknowledged that Table 2 (Page 33) reduces the total of supply commitments to 4,595 dwellings to remove any undeliverable sites, a reduction of 620 dwellings. However, it is not at all clear within the evidence base as to how this reduction has been calculated or whether the aforementioned sites have been removed from the supply.
- 2.17. The Housing Land Supply Assessment Update November 2020 is the most recent document within the evidence base which outlines the number of dwellings unlikely to be built within the period 2020-2025. This totals 2,190 dwellings, which is significantly greater than at identified within Table 2 (Page 33). This highlights further concern on the validity of the figures proposed.

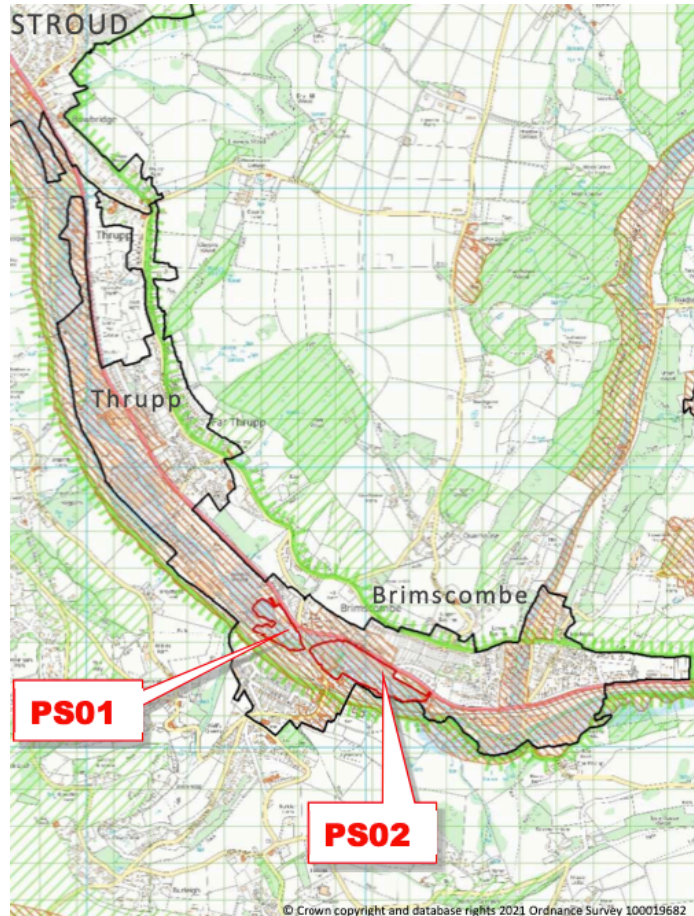
Core Policy CP2 – Strategic Growth and Development Locations (Pages 52-53)

- 2.18. Finally, in relation to Table 2 (Page 33), but also principally related to Core Policy CP2, we turn to the validity of relying upon the allocated sites within the Local Plan, with specific reference to Brimscombe & Thrupp. In terms of allocations, the settlement contributes 190 allocated dwellings towards the 985 allocated dwellings on “local sites at smaller settlements”, approximately 19%. This is the highest allocation number of all of the smaller settlements, but is also greater than some higher tier settlements, including Berkeley, Minchinhampton, Nailsworth, Painswick and even Stroud.
- 2.19. The allocated sites for Brimscombe & Thrupp, include the following:
- Brimscombe Mill (Local Sites Allocation Policy PS01) – 40 dwellings
 - Brimscombe Port (Local Sites Allocation Policy PS02) – 150 dwellings
- 2.20. Both of these allocations were included within with adopted Stroud District Local Plan (2015) and neither of which have planning permission or have been subject to a planning application since their initial allocation some 6 years ago. This would already suggest that they would not be readily deliverable. The Housing Land Supply Assessment Update November 2020, acknowledges that neither site would be likely to come forward until 2025 at the earliest. Given the delay already, and the economic climate, we would suggest that this would be significantly optimistic on the Council’s behalf.

Core Policy CP3 – Settlement Hierarchy (Pages 54 – 57) and Section 3.1 – Shaping the Future of The Stroud Valleys – Brimscombe & Thrupp (Page 75)

- 2.21. Core Policy CP3 outlines that Brimscombe & Thrupp is considered to be a Tier 3a settlement and is considered to be an accessible settlement with local facilities. It should be noted that Brimscombe & Thrupp has been enhanced in the settlement hierarchy from the approved Stroud District Local Plan (2015). This is by virtue of joining both settlements together to form a larger area. Given the proximity to one another, we are supportive of this approach.
- 2.22. However, we consider that the hierarchy level for Brimscombe & Thrupp as single entity has been downplayed and should be considered a Tier 2 settlement.
- 2.23. Following review of the Stroud District Settlement Role and Function Study Update 2018, which forms part of the evidence base for the SDLRP, it is acknowledged that Brimscombe & Thrupp has some of the best accessibility to facilities and services in the District and forms a key employment role. Although, it does not have any strategic role in services or retail, given its proximity to and access to Stroud, immediately adjacent, we consider that the settlement has been disproportionately marked down in this respect.
- 2.24. We would suggest that Brimscombe & Thrupp is on a par with some of the other large settlements including Minchinhampton, Painswick and Berkeley, in terms of accessibility, services, retail and employment. For example, Painswick was upgraded from Tier 3 to Tier 2, with essentially the same settlement score. Due to this and given the proximity to Stroud, we consider that Brimscombe & Thrupp should be further upgraded to being a Tier 2 settlement.
- 2.25. Notwithstanding this, Stroud District Settlement Role and Function Study Update 2018 (Page 84) acknowledges that Brimscombe & Thrupp has had an “extremely low housing growth of just 1% between 2011 and 2018 (a net increase of 13 new dwellings), which is well below the District-wide rate of growth (6%)”. This is also lower than the similarly sized “large” settlements in the District, as mentioned above.
- 2.26. This is an incredibly poor delivery given the range of facilities and services are located within or adjacent to the settlement and how accessible it is generally. In addition to the concerns over the delivery of existing and allocated residential sites within Brimscombe & Thrupp, as mentioned above, it is clear that further housing allocations and assessment of the settlement boundary will be required in order for the Council to meet its housing need in the most sustainable locations.

2.27. In addition to this, given its identified settlement importance, there is nothing within the evidence base for the SDLRP that would suggest that there has been a full assessment of other available sites in and around Brimscombe & Thrupp or any assessment of the Settlement Development Limit (SDL). The SDL and housing allocations have simply been rolled on from the adopted Stroud District Local Plan.



Proposed SDL and Allocations for Brimscombe & Thrupp

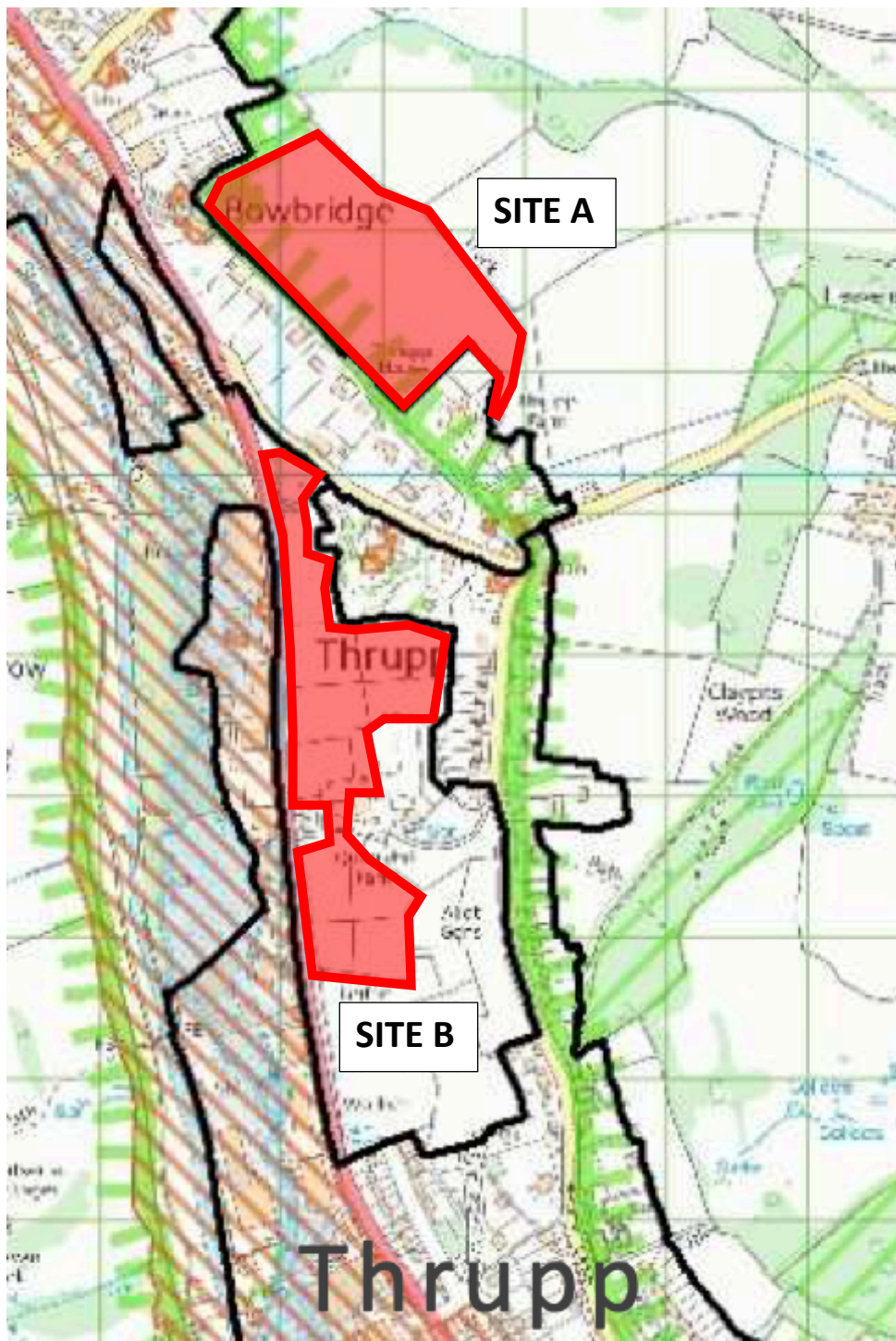
2.28. It is acknowledged that Core Policy CP3 allows for certain types of development to be considered on land adjoining SDL's. However, these are restricted 100% affordable housing schemes, single self-build plots, live-work development and tourism/leisure development. Whilst this brings in a certain level of flexibility, it still does not help towards meeting the primary housing need, as assessed above, which would include market housing.

2.29. We strongly object to the limited amount of development planned for Brimscombe & Thrupp at this stage and the tightly drawn settlement boundary, which will essentially provide a blanket restriction on new market housing and sustainable growth over the plan period. This simply does not comply with the proposed

development strategy set out and the Governments objective of supporting sustainable economic growth. We would urge the Council to reconsider its approach to Brimscombe & Thrupp.

3.0 Promotion of Housing Sites in Brimscombe & Thrupp

3.1. As mentioned, the respondent controls a couple of parcels of land outside but adjacent to the defined Settlement Development Limits (SDL) of Brimscombe & Thrupp and Stroud. These parcels of land are known as Land off Gunhouse Lane



(Site A) and Quarry Hill Farm Fields (Site B). The location of the sites in relation to the SDL is shown below.

Location of two alternative housing sites in Brimscombe & Thrupp (Outlined in Red)

- 3.2. Brimscombe & Thrupp is a linear form of settlement located within a valley alongside the A419 and the River Frome. Predominantly, industrial/employment development is located at the base of the valley on the west/south west side of the A419, with residential development predominantly on the east/north east side of the A419 heading up the valley side.
- 3.3. It is noted that the key constraints within and around Brimscombe & Thrupp principally include the location of the Cotswolds AONB towards the top of valley either side and the Industrial Heritage Conservation Area on the valley floor. There are also areas of high Flood Zones at the valley floor around the River Frome, however neither Site A or B are impacted by this constraint.
- 3.4. Whilst these constraints are clearly factors for consideration, they do not necessarily rule out the allocation of sites within the SDLRP or amendments to the SDL. For example, there are a couple of allocations proposed within the SDLRP that are located within the Cotswolds AONB (PS05 – East of Tobacconist Road, Minchinhampton & PS41 – Washwell Fields, Painswick) and the existing SDL of Brimscombe & Thrupp lines the Conservation Area and elements of the Cotswold AONB already.
- 3.5. Both Sites A & B are ideally located in terms of the Brimscombe & Thrupp settlement, but also being at the northern end of the settlement, they are in very close proximity to Stroud. They are also located to ensure that the linear character of the village remains intact.
- 3.6. It is not the intention of this representation to undertake a detailed site-specific assessment of Sites A & B above at this stage. We are also not suggesting that each of these sites would be developable in their entirety. However, the respondent is keen to point out that both of these parcels of land are available and capable of being brought forward in the short term. As a result, they would ultimately be capable of consideration for allocation, particularly on the basis of the case made above and throughout this representation.

- 3.7. The respondent would welcome any assessment of these sites for the purposes of allocation and/or amendment to the SDL.

4.0 Conclusion and Recommendations

- 4.1. A key question of this Regulation 19 Consultation is whether the Plan is legally compliant and sound. The respondents do not intend to comment on the legal compliance of the process. However, as it currently stands, and without making the amendments suggested within this representation, the respondents consider that the Plan fails to meet the test of “Soundness”.
- 4.2. The guidance makes it clear that for a plan to be declared ‘Sound’ it needs to meet the following tests:
- Be Positively prepared - providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the NPPF
- 4.3. The respondents are concerned that the Plan as currently drafted fails to meet the first two tests, in that it has not been proven to be ‘positively prepared’ or ‘justified’. This is because it does not provide adequate housing to meet the identified needs of the District from the outset, creating a shortfall immediately following an adoption of the plan.
- 4.4. Furthermore, there are significant concerns as to whether sites forming part of the housing supply within the SDLRP would be deliverable. In particular, we have identified two sites in the anticipated supply within Brimscombe & Thrupp specifically, which no longer benefit from planning permission. Therefore, major concerns are raised over whether the supply assessed in other settlements in the District will be accurate.

- 4.5. In addition to this, the reliance on only two allocation sites within Brimscombe & Thrupp, both of which have previously been allocated through the Stroud District Local Plan (2015) and do not look like they will be coming forward in the short term, would be another concern impacting on housing supply.
- 4.6. Brimscombe & Thrupp has been identified as a sustainable settlement through the SDLRP and the supporting evidence base. Notwithstanding the concerns over existing supply and allocations within the settlement, given the size of the settlement, its proximity to Stroud and the services and facilities it has access to, we consider that Brimscombe & Thrupp is able to take a substantially greater amount of new housing. In addition, given its similarity to other “large” settlements in the hierarchy, we would consider that the settlement should be enhanced further to be considered as a Tier 2 Settlement. Sites such as Land off Gunhouse Lane (Site A) and Quarry Hill Farm Fields (Site B) should therefore be considered as part of this assessment of additional allocations.
- 4.7. Furthermore, the existing settlement boundary around Brimscombe & Thrupp, which has not been amended from the adopted Stroud District Local Plan (2015), is simply too tightly drawn and the strategy to not increase this settlement boundary would be a mistake in our view. Providing tightly drawn settlement boundaries, with little flexibility in policy to develop outside them unless in exceptional circumstances, is essentially an attempt to impose a blanket restriction on new development. This approach is incompatible with the NPPF’s requirement to significantly boost the supply of new housing.
- 4.8. The tight drawing of settlement boundaries also potentially prevents sustainable forms of development coming forward, that may otherwise be perfectly acceptable. We consider that the Council should re-consider its strategy by either significantly widening settlement boundaries to facilitate more housing or provide greater flexibility in the housing policies to allow development that is adjacent to settlement boundaries to come forward, where it can be demonstrated that such development is sustainable.
- 4.9. Without these changes, the respondent considered that the SDLPR will be found to have not been “positively prepared” or “justified” and would be therefore considered to be unsound. We would strongly urge the Council to re-consider their limited

approach to new housing in Brimscombe & Thrupp, which is a location that is more than capable of absorbing significantly higher levels of new development.



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