

Date: 14 March 2019
Our ref:
Your ref:



Stroud District Council,
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

Dear Sir or Madam,

**Representation for the Stroud District Local Plan Review (SDLPR)
Land off Dozule Close, Marsh Lane, Leonard Stanley**

This representation has been put forward to illustrate why the above site should be considered for a residential allocation in the upcoming Local Plan Review and why there is a greater need for proposed housing allocations in Leonard Stanley.

Location and Surrounding Land Uses

The site measures circa 1.1 hectares and adjoins Leonard Stanley’s existing settlement boundary. It is bounded by: Leonard Stanley Primary School to the north; proposed housing allocation PS16 (for up to 30 dwellings) to the north east; the built-out Barratt Home Saxon Gate development (150 dwellings granted under reserved matters application S.16.1398/REM) to the east and south; and existing residential development along Dozule Close to the west.

The inclusion of the Barratt Home Saxon Gate development has resulted in our client’s site effectively becoming isolated and surplus to requirements for an agricultural use.

Local Plan Review- Emerging Strategy

In considering the surrounding land uses and the site’s isolation, guidance set out in page 103 of the emerging Local Plan review has earmarked the site to be included within the development limits of Leonard Stanley.

As officers will be aware, within defined settlement development limits, permission will be granted for residential development if proposals satisfy the provisions set out under adopted local plan policy HC1.

Guidance set in page 65 of the emerging Local Plan review illustrates that Leonard Stanley only has one proposed housing allocation for up to 30 dwellings - PS16 (Land to the south of Leonard Stanley Primary School). Guidance also set out in page 65 goes onto state that Leonard Stanley’s preferred direction of housing growth is to the north and northwest of the settlement.

This proposed allocation adjoins our client's site to the north east and it should be considered when this allocation is also built out, it will consequently lead to our site becoming further inaccessible. For this reason, it would be considered a sensible approach to include my client's site as a proposed allocation in the Local Plan review .

Therefore, the site is sustainably located within what will be the settlement boundary of a 3a settlement, on land that has no restrictive planning policy designations.

SDC's Housing Requirement

The Emerging Strategy identifies the need for at least 12,800 new dwellings (638 per annum) based its standard methodology. Of this figure tier 3a settlements (which includes Leonard Stanley) accounts for the provision of 3,995 dwellings.

[REDACTED] settlements, circa 69% of this proposed growth (2,770 dwellings) is directed towards Sharpness over the next plan period.

[REDACTED] November 2014, contains information which has been used to determine the settlement hierarchy. Each settlement has been analysed based on its access to local and strategic services.

In this document, Leonard Stanley has been given an overall accessibility score of 'fair', in comparison to Newtown & Sharpness which is considered to have a 'very poor' overall accessibility score.

It is somewhat questionable as to why so much housing is proposed in Newtown & Sharpness and debateable whether it will be able to deliver the amount of housing proposed, due to potential slow delivery and build rates which could result in a deficit for Stroud's future housing supply.

It should be considered that this allocation is distributed more evenly across other tier 3a settlements, which are considered to have better access to strategic and local facilities such as Leonard Stanley.

Landscape

The site is flat and is not set within any sensitive landscape designations. Cotswolds AONB is located circa 330 metres from the boundary to south east and is screened off from the site by the Barratt Home Saxon Gate development. It should be considered in landscape terms that our client's site is less sensitive than 2017 SALA sites LEO004 (Land north of Bath Road), LEO005 (Land rear of Chapel House) and LEO006 (Land at Bath Road), and as a result we consider that proposed housing

allocations contained within Leonard Stanley's existing built up area, should be brought forward prior to options beyond settlement limits in the open countryside.

Ecology

The site was previously in agricultural use and since the development of Barratt's scheme it has effectively become disused, with limited if any ecological value. The ecological benefit of the site is likely to relate to boundary features of the site to the south and east, which will be are likely to be retained in any future development.

Access

Access to the site can be gained via from Dozule Close- either at the end of the close adjacent to the turning head, or towards the south of the Close towards the junction of Marsh Lane.

[REDACTED] ed to as Leonard Stanley Footpath 12 runs to south and east of the site. This [REDACTED] ge between Barratt's scheme and our site and will not need diverting.

Drainage

[REDACTED] for land-use planning indicates that the entire site is in flood zone 1. This indicates that the overall site has a low probability of flooding (less than 1 in 1,000 annual probability of river flooding) and can be developed.

Heritage

The nearest heritage asset is Marsh Lodge (1171534) which is Grade II listed and is located circa 204 metres from the site's boundary to the north west. It is separated by existing residential development on Dozule Close and Mankley Road and there is a satisfactory buffer in place to ensure that the site's development is sufficiently screened from this heritage asset.

Affordable Housing

The adopted Stroud Local Plan sets out that there is a shortfall of affordable dwellings and that an additional 446 per annum are required. Any future scheme will comply with any relevant policies set out in the local plan.

Summary

In considering the above, there would appear to be no overriding physical constraints or potential impacts preventing a sensitively located development for a small to medium scale residential allocation.

Bruton Knowles would like to express that the site is under single ownership and that it is immediately available and deliverable over the next 5 years. For these reasons the site would make an appropriate residential allocation.

Local Plan Review- Questions

Below we provide the following answers to your consultation document insofar as they relate to our client's site.

Question 1.0a Have we identified the top 5 issues for you?

Yes. The identified issues seem a reasonable approach, however housing allocations should be priority within the proposed development limits prior to designations in the open countryside. Housing allocations should also be more evenly distributed between other tier 3a settlements, [REDACTED] reliance on the delivery of housing in Newtown & Sharpness.

[REDACTED] agree with the ways we intend to tackle these issues?

[REDACTED] cross tier 3a settlements where they have good access to

Question 2.3a Do you agree with the ways in which the emerging Strategy intends to meet local housing need?

The expansion of sustainable settlements is encouraged by National Policy. In this instance, it is considered an opportunity is being missed to release a greater amount of land to meet this need.

Question 2.3b Do you support an alternative approach? Or have we missed anything?

As discussed above, an opportunity is being missed to provide a greater area of land contained within the proposed development limits of tier 1 to tier 3 settlements. Our client's land would support this approach.

Question 4.2a Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

As set out above, housing growth should be more evenly distributed between tier 3a settlements that includes Leonard Stanley.

Question 4.2c Have we identified the right towns and villages for growth? Or do other settlements have growth potential? (and 4.3a)

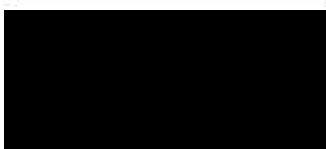
Insofar as relates to our client's land it is considered incorrect. Further land should be allocated to Leonard Stanley, because there is an overreliance on large allocations that make up the proportionate housing growth required.

Question 4.4c & d Do you support the proposals to allow some limited development beyond settlement development limits?

Yes, however housing growth should be considering within the proposed development limits of settlements prior to that beyond settlement limits.

Should you have any queries please let me know.

Yours sincerely



Planner