

## Emerging Strategy – Response to Questions

Below is my response to the questions asked on the Emerging Strategy for the Local Plan. I live in Hardwicke Parish so where appropriate my comments refer to the Hardwicke Parish. My contact details are at the bottom should they be required.

My responses include issues that I think are related to the questions raised and pertinent to the Emerging Strategy even though they may not be directly related to it.

### **1. Question 1.0a: Have we identified the top 5 issues for you?**

1.1. Sort of. They are all valid but what happens to the other responses. Is the plan going to just ignore them? Is there any follow up on the responses to explain what will happen to them, even if its just to say they are not feasible?.

### **2. Question 1.0b: Do you agree with the ways we intend to tackle these issues?**

2.1. ***Key issue 1: Ensuring that new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development.***

2.1.1. Community suggestions include '*...Prioritise building on brownfield and infill sites, rather than greenfield and agricultural land...'*.

There is no mention of brownfield and infill sites against this issue making it look like it has been ignored, albeit It has been covered in issue 3.

2.1.2. The affects of '*...Concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure...'* are usually mitigated by additional service, facilities and infrastructure offsets. These are often diluted in discussions between developers and the Planning Authority causing frustration to the communities hosting the new development. If a development warrants a level of additional service, facilities and infrastructure as mitigation of the effects then it should never be diluted to simply satisfy the needs of the developer.

2.1.2.1. I believe there should be a policy along the lines that if infrastructure and services are agreed as being necessary to mitigate the affects of a development then they should not be reduced later unless there is a reduction in development size.

2.1.3. *Concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.*

2.1.3.1. What does the A38/M5 corridor actually mean? I assume it means the corridor formed by the A38 and M5, which makes sense. If not then it needs to be better defined.

2.1.3.1.1. If you are concentrating growth in the A38/M5 corridor then why is the area G1 on page 75 allocated as it is outside this corridor? G1 should be removed from the emerging strategy.

2.1.3.2. It's OK planning employment growth in tandem with employment growth, but they need to be in discrete locations to minimise conflicts between the needs of employment and resident environments. Where these are set up it is no good changing an employment site to residential later as conflicts between residents and employment activity will occur. This is happening at Hunts Grove, again driven by the developers need for greater profits to the potential detriment of residents.

2.1.3.3. If developers are requesting a change of use from employment to residential within the District then why do SDC need to identify further employment sites?. It doesn't make sense.

**2.2. Key issue 2: Conserving and enhancing Stroud District's countryside and biodiversity, including maximising the potential for a green infrastructure network across the District.**

2.2.1. The community responses included '*...Establishing green links along river/canal corridors...*' and '*...Expanding the boundaries of the Cotswolds Area of Outstanding Natural Beauty (AONB)...*'.

2.2.1.1. The strategy response seems to be generic statements of undefined policies that will probably turn out to be non-enforceable. Rivers and canals are not mentioned in the proposed strategy yet maintaining their character by protecting their setting would seem to be an important policy from my view. They play such an important part of the character of Stroud District that they deserve dedicated policies in the Local Plan.

2.2.1.2. Any policies on canal corridors should consider the Gloucester/Sharpness canal that runs through the Stroud District.

**2.3. Key issue 3: Maximising the potential of brownfield and underused sites to contribute to housing supply.**

2.3.1. The community responses included '*...Converting empty shops and space above shops...*'. The suggested strategy considers only brownfield sites. I do not know if brownfield sites include shop space but the way it reads the proposed strategy appears to ignore the community responses.

**2.4. Key issue 5: Tackling the acute lack of affordable housing in the District.**

2.4.1. The community responses included '*...building more council houses...*'. Again this appears to have been ignored by the strategy. If it's not possible to build more council houses then this should be explained. If it is possible then it's reasonable to expect an acknowledgement in the strategy.

2.4.2. The community responses also included '*...encouraging developers to build smaller houses and bungalows to that the young can afford to buy and the elderly can downsize...*'.

2.4.2.1. This is a longstanding need of the district and has been well documented in many studies, including the Hardwicke Future Housing Needs Assessment. But again there appears to be nothing recognising this in the emerging strategy response. Nothing will change without a policy to ensure a developer addresses the identified needs like this.

2.4.2.2. The proposed strategy regurgitates many current policies such as '*ensuring proportionate allocation of affordable housing on major developments; identifying opportunities for affordable housing and encouraging rural exception sites*'. This has not worked up to now, so why will it in the future? In fact, in my humble opinion, the failure to implement some of these policies has contributed to the current situation. For example

- The current allocation of affordable housing on major developments appears to be regularly reduced, even withdrawn, in the face of developer claims of non-viability. Hunts Grove being an example.
- I understand that last year SDC set a precedent by using an exception site for non-affordable housing, why would SDC go against the core purpose of an exception site?

2.4.2.3. I am sure there are successes to counter these examples, but the examples above erode confidence that the same old strategy will produce the increased number of affordable housing or the mix required to meet the identified needs of the community. It needs a change of strategy or a tightening of the wording in the strategy to ensure the policies that emerge from the strategy are enforced.

2.4.2.4. Of course the additional National housing allocation provides developers with the extra leverage they need to pressurise the planning authority into agreeing with diluted allocations rather than lose the development; even more reason to strengthen the LP policies to provide a balance.

2.5. ***The entries in the issues or challenges missed in the current Local Plan included:*** '*...better parking facilities...*'

2.5.1. Planning Update Written Statement HCWS488 stated that '*...The imposition of maximum parking standards under the last Administration lead to blocked and congested streets and pavement parking. Arbitrarily restricting new off-street parking spaces does not reduce car use, it just leads to parking misery. It is for this reason that the Government abolished national maximum parking standards in 2011. The market is best placed to decide if additional parking spaces should be*

*provided...'*.

2.5.1.1. Parking issues in Hunts Grove phase 1 are regularly identified in Hardwicke Parish Council reviews in an attempt to improve future developments. It's an issue that epitomise the situation in the written statement. There appears to have been little change in developer's parking provision presumably as they see it as wasting valuable land space. I believe the issue is important enough, and contributes significantly to a content community sufficiently, that the provision of improved parking space on developments should be included in the Local Plan policies.

**2.6. *The entries in the issues that did not make the Top 5 but were raised specifically by local community representatives included '...the need to address traffic congestion...'***

2.6.1. This is an important, and rapidly growing, issue in Hardwicke and I suspect in other areas of the district such as Stonehouse and Eastington. My understanding is that the Highways Agency is responsible for major strategic routes in the district (in Hardwicke that will be the M5, A38 and B4008 link), Gloucestershire County Council Highways are responsible for the on-going maintenance of adopted roads whilst SDC Planning Authority (PA) are responsible for new development roads until adopted. I believe the PA is dependent on planning application reviews conducted by Gloucester County Council Highways (GCCH) as mandatory consultants in the planning process.

2.6.2. There is nothing in the Local Plan about how traffic is managed through the district, particularly regarding responsibilities and interfaces between agencies. Much is lauded on major strategic mitigation, particularly around motorway junctions, but there is little publicity for the growing problems of local traffic congestion around large developments such as Hunts Grove/Waterwells/Kingsway.

2.6.3. Legislation requires that major developments provide evidence of traffic impacts and mitigation in the form of predicted travel flows, traffic management plans and transport assessments. These are readily churned out, often with discrepancies and questionable conclusions. They often include good intentions and optimistic predictions on how good their mitigations will be. I don't ever recall seeing a post development analysis of how accurate this evidence turns out to be.

2.6.4. If the Planning Authority is ultimately accountable for non-strategic highways in developments then this should be recognised in the Local Plan along with visions, aims and objectives for managing local traffic effects in the future.

### **A local need for housing...**

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

3.1. No, as explained below these are the policies that have failed to deliver the

required local housing need in the past so unless something changes then the same policies will have the same outcome. If the current policies are to be retained then there must be some tightening of the implementation criteria to ensure the policies deliver the intended outcomes.

#### **4. Question 2.3b: Do you support an alternative approach? Or have we missed anything?**

4.1. The strategy states that '*...Having taken into consideration your views, national policy and evidence where available, the emerging Strategy will seek to deliver:...*'

- *at least 638 new homes per year for a 20 year period*

4.1.1. I believe this Nationally imposed 40% increase in housing allocation will place an even greater burden on the PA to deliver developments. Add to this the fact that it will be borne by just 50% of the District that is outside the Cotswold AONB then the demands become considerable. My concern is that this burden will undoubtedly manifest itself in additional pressure on Planning Officers to permit applications. This will understandably lead to PO's tending towards permitting rather than rejecting applications. It becomes more important then that policies are specific enough to ensure their intent can be applied with minimal interpretation.

- *A mix of brownfield and greenfield allocated housing sites of varying sizes to ensure delivery is maintained throughout the plan period*

4.1.2. This commitment to use greenfield sites is not included in the proposed strategy response to key issue 3 above, it only quoted the use of brownfield sites. For consistency and visibility of the strategy the intended use of greenfield sites should be quoted whenever the intent to use them is present.

4.1.2.1. I think the use of greenfield sites, regardless of their level of sustainability, should only be considered when the availability of brownfield sites have been exhausted,.

- *'...A proportion of affordable homes on all sites of 10 dwellings or above in urban areas and on all sites of above 5 dwellings in designated rural areas...'*

4.1.3. This has not worked up to now, so why will they in the future. In my humble opinion, the failure to implement this policy has contributed to the current situation. The current allocation of affordable housing on major developments appears to be regularly reduced, even withdrawn, in the face of developer claims of non-viability. Hunts Grove being an example.

4.1.3.1. If the policy is retained then it needs to be accompanied by a statement committing to its enforcement.

- *Additional affordable homes working with parish councils, co-operatives, community land trusts and community housing groups*

4.1.4. How is this going to build additional affordable homes? Needs to have a firm commitment.

- *Minimum dwelling sizes, subject to evidence of need, to avoid town cramming*

4.1.5. What does this mean? Surely housing regulations determine the minimum size of homes.

- *A mix of dwelling types (1 bed, 2 bed, 3 bed, 4+ bed, flats, houses, bungalows, etc.) on Local Plan housing sites in proportion to identified local needs*

4.1.6. This is the current policy, and it doesn't work. Developers continue to maximise the number of larger dwelling types to maximise profit contrary to the identified needs of the community for smaller houses and bungalows suitable for our growing elderly population. Until the policy changes then the outcomes will be the same and the identified 'needs gap' in housing will continue to grow...or the implementation of the policy changes.

- *Small scale housing in rural areas in the interests of social sustainability, subject to local community support through the preparation of neighbourhood plans*

4.1.7. I am not convinced that the time and effort dedicated by volunteers to produce a Neighbourhood Development Plan provides the local community with the level of influence claimed by District Councils or the Government.

4.1.7.1. My impression, rightly or wrongly, is that key elements of the Hardwicke Neighbourhood Development Plan, particularly the Future Housing Needs Assessment and Landscape Character Assessment, are given limited weight and influence in the planning process. When its content is not applied there is minimal feedback as to the reasons.

4.1.7.2. The lack of integration of the Hardwicke NDP into the emerging strategy is another indicator of the limited implementation of NDPs. The area G1 on page 76 of the emerging strategy has been earmarked for development, despite much of the areas being identified as a mix of open space important to the community and designated Local Green Space.

4.1.7.2.1. The draft vision for the Gloucester Fringe in 2040 on page 75 states that '*...Hardwicke's village character and sense of community will be preserved, while the area to its east sees continued housing and employment growth, and plays an ever more important role as a 'gateway' to Gloucester...*' effectively re-enforcing the NDP policy.

4.1.7.3. ...and yet the emerging strategy allocated the space for development.

4.1.7.4. If the LA wants the NDP to state the development wishes of the community then it needs to be accepted as such by the PA and its content respected and implemented. Otherwise the community is wasting its time and effort.

#### **Local green spaces and community facilities...**

#### **5. Question 2.4a: Do you agree with the ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?**

5.1. The strategy states that it will seek to deliver '*...Policy protection for important open spaces within settlements, outdoor recreation facilities, playing fields or allotments within or relating to settlements...*'

5.1.1. One of the roles of a NDP is to identify open spaces important to the community. It seems sensible that the final policy statement includes any important open spaces identified in a 'made' NDP.

5.2. The strategy states that it will seek to deliver '*...Support for the identification of local green spaces through Neighbourhood Development Plans and the protection of community facilities through existing Assets of Community Value legislation...*'

5.2.1. One of the roles of a NDP is to identify Local Green Spaces therefore this statement seeks what is already there. It seems sensible that the final policy statement replaces the term '*...identification of Local Green Spaces...*' to the '*...protection of identified Local Green Spaces...*'.

5.3. The strategy states that it will seek to deliver '*...Opportunities to address identified community needs in association with new development through the Community Infrastructure Levy (CIL) and s106 agreements...*'

5.3.1. I would like to see the final policy to include a mandatory requirement to invite settlement/community representation in the identification of community needs to ensure their views considered when CIL and S106 agreements are made. The same is true of changes to any agreed master-plan.

#### **6. Question 2.4b: Do you support an alternative approach? Or have we missed anything?**

6.1. No.

#### **A vision for the future...**

#### **7. Question 3.1a: Do you agree with the vision for 2040 as drafted?**

7.1. I agree with the facts of its content, but I do not think it is not so much a vision as a statement of where we are now.

**8. Question 3.1b: Do you support an alternative approach? Or have we missed anything?**

8.1. The Oxford dictionary defines a vision in this context as '*...The ability to think about or plan the future with imagination or wisdom...*'

8.2. The vision comes across as more of a statement of where we are now. It does identify much that is good in the District, but lacks aspiration nor does it 'paint a picture' of where we want to be in 2040. It's a difficult thing to achieve on such a wide-ranging organisation but I believe the benefits could be considerable.

**Strategic Objectives...**

**9. Question 3.2a: Do you agree with the Strategic Objectives as drafted?**

9.1. Yes, but I would change their nomenclature to Strategic Aims.

**10. Question 3.2b: Do you support an alternative approach? Or have we missed anything?**

10.1. The content of the section provides a reasonable summary of each element aims but I personally think it is misnamed. The term 'strategic' relates to the identification of long-term or overall aims and interests and the means of achieving them. The term 'objective' means something aimed at; a goal. Objectives are usually focused and specific, containing measurable elements and often time bounded.

10.2. These are more akin to Strategic Aims as they are general and contain no measurable element that can be monitored.

**The emerging growth strategy...**

**11. 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?**

11.1. Supported.

**12. Question 4.2b: Do you support an alternative strategy approach?**

12.1. No.

**13. Question 4.2c: Have we identified the right towns and villages for growth? Or do other settlements have growth potential?**



13.1. The strategy mentions the A38/M5 corridor as being a sustainable area for development. I would have thought there was scope for development along the corridor between the Cross Keys and Whitminster roundabouts.

**14. Question 4.2d: Do you support our approach to addressing Gloucester's housing needs?**

14.1. No. The approach pre-supposes a defined need and pre-empts the consideration of locations further afield. It is also frustrating that SDC appears to be going beyond its minimum regulated responsibilities to offer its open spaces to Gloucester when Tewkesbury, a member of the Joint Core Strategy (JCS) that includes Gloucester, is rejecting an 850 dwelling application on the grounds that it would be '*...an intrusion into the rural landscape...*' and Gloucester City Council rejects an 80 dwelling development as it values its open spaces.

14.2. The emerging strategy states that '*The Joint Core Strategy for the Gloucester City, Tewkesbury Borough and Cheltenham Borough areas has identified that in the longer term additional sites will be required to meet Gloucester's housing needs beyond 2028.*

*Stroud District Council is committed to working together with these authorities and other authorities to Gloucestershire to identify the most sustainable sites to meet these future needs.*

*An assessment of potential alternative sites to meet Gloucester's long-term housing needs will be carried out during 2019...'*

14.2.1. What the JCS says at Para 3.2.2 is '*...It has long been recognised that **Gloucester and Cheltenham** cannot wholly meet their development requirements within their administrative areas, and as such collaborative working across boundaries through the duty to cooperate is necessary. This was previously addressed through the Gloucestershire County Structure Plan and the draft Regional Spatial Strategy (RSS), which identified both Gloucester and Cheltenham as being amongst the region's strategically significant cities and towns. All the Gloucestershire local planning authorities are working together, within the context of the duty to cooperate, to ensure that new development plan documents properly address strategic planning and cross-boundary issues.*

*A wider memorandum of understanding is maintained between all Gloucestershire districts covering issues which require joint working. In addition, the Gloucestershire authorities have entered into a devolution bid which sets out the commitment to work together to progress strategic plans in the event of the creation of a devolved authority....'*

14.2.1.1. I assume all districts neighbouring the JCS districts are signatories to the MoU, if not, why not? The neighbouring districts to the JCS members are

- Malvern Hills
- Forest of Dean
- Stroud

- Cotswold
- Wychavon

14.2.2. NPPF paragraphs 24-27 sets out the requirement for maintaining effective cooperation including the statement in paragraph 25 that '*...Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans...'*

14.2.2.1. In my view the MoU signed by SDC fulfils this requirement.

14.2.3. The emerging plan goes on to state '*...Possible sites to the south of Hardwicke and at Whaddon (within Stroud District) will form part of that assessment, together with other sites both within and on the edge of Gloucester but within neighbouring council areas. The site(s) that perform best will be identified in the respective council's future draft plan(s) for potential allocation...'*

14.2.3.1. Why are these sites identified ahead of the requirement being confirmed? The identification of individual sites is non-strategic as indicated by NPPF paragraph 28 that states '*...Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. **This can include allocating sites...**'*

14.2.4. The NPPF goes on to state at paragraph 30 '*...Once a neighbourhood plan has been brought into force, **the policies it contains take precedence over existing non-strategic policies in a local plan** covering the neighbourhood area, where they are in conflict;...*

14.2.4.1. A large part of area G1 on page 76 of the emerging strategy is designated 'space of significant importance' to the Hardwicke Community or Local Green Space in the Hardwicke Neighbourhood Development Plan. As stated above the NDP takes precedence over non-strategic policies therefore the allocation of this space is contrary to the NPPF.

14.2.5. Section 2.4 of the emerging strategy is titled '*...Local green spaces and community facilities...*'. Page 21 states that '*...Having taken into consideration your views, national policy and evidence where available, the emerging Strategy will seek to deliver:*

- *policy protection for important open spaces within settlements, outdoor recreation facilities, playing fields or allotments within or relating to settlements...*

14.2.5.1. This suggests that future policies in the Local Plan will provide policy protection for the spaces identified in the Hardwicke NDP – so again, why is G1 included in the strategy.

14.2.6. In my humble opinion I believe the allocation of locations to satisfy an undefined JCS requirement goes beyond the NPPF requirement for co-operation.

Additionally the allocation of area G1 as a possible development site is contrary to NPPF, the current SDC Local Plan, future policies in the emerging plan and the Hardwicke NDP. I believe area G1 should be removed from the emerging plan.

14.3. SDC is mentioned several times in the JCS giving the impression that SDC appear to be much more than co-operative in fulfilling its duties than other districts.

14.3.1. JCS Para 7.1.18 states that *'...The JCS authorities have a Statement of Cooperation in place with Stroud District regarding the need to explore meeting unmet needs arising from the JCS area within Stroud District where it is reasonable to do so and consistent with achieving sustainable development. As such, it is important than any review is undertaken in tandem with the review of the Stroud Local Plan so that all potential development alternatives are comprehensively explored using agreed site assessment criteria through the plan-making process...'*

14.3.1.1. It is important for transparency that the following is clarified either in the Local Plan or by reference to their origins

- Where the MoU can be found
- Identification of all the sites nominated by all signatories to the MoU
- The agreed site assessment criteria to be applied to all nominated sites
- A timeframe for any assessment

14.3.2. The emerging strategy goes on to state that *'...At that stage, if sites at Whaddon or South of Hardwicke are not needed to meet Gloucester's immediate needs, then there is the potential to review how these sites might contribute to future needs and whether there is merit in them coming into the Stroud Local Plan with consequential changes to the strategy...'*

14.3.2.1. So basically, if Hardwicke is not required by the JCS then it will be used for additional development for SDC!

14.3.2.1.1. The land identified as G1 on page 75 is identified in the Hardwicke Neighbourhood Development Plan as a mix of important open space and Local Green Space. The core of original Hardwicke contains one of, if not the, densest collections of Grade 1 and Grade 2 structures in the district, running alongside the lanes that pass through G1. Development in this area will effectively destroy the setting and backdrop of original Hardwicke, smothering the village and consigning Hardwicke from a typical Gloucestershire village to just another Gloucester City suburb.

14.3.2.2. This is of course in direct conflict with the stated vision for the Gloucester Fringe that states *'...Parishes on Gloucester's fringe will retain their distinctiveness and rural character, providing a valuable green hinterland to the city and a setting for the Cotswolds AONB...'*

14.4. The MoU fulfils the offer of co-operation, going further is going beyond what

is required by the NPPF. In my humble opinion going further could be seen as collaboration, not co-operation.

SDC has a responsibility to represent the interests of the residents of Stroud District. In my humble opinion Identifying specific areas in the Local Plan prior to the JCS call for sites; identifying a site that is contrary to the NPPF, the current Local Plan, the Emerging Strategy and the Hardwicke NDP; could be seen by some as abdication of that responsibility.

**15. Question 4.2e: Do you support an alternative approach to addressing Gloucester's housing needs?**

15.1. No. I appreciate the need for co-operation as set out in the NPPF. I just want a common agreed methodology applied equally to all districts neighbouring JCS districts. I would prefer not to see Stroud District going beyond what I believe they need to do.

**Settlement hierarchy...**

**16. Question 4.3a: Are any of the settlements in the wrong tier and, if so, for what reason?**

16.1. Much of the mini-visions and settlement commentary fails to recognise that Hunts Grove is part of the Hardwicke Parish. It's acceptable to identify Hunts Grove as a major new development but the general strategy needs to reflect Hunts Grove as a development in the Hardwicke Parish.

16.1.1. For example on page 76 – The Gloucester Fringe – Potential sites and alternatives...Hardwicke states '*...When completed, Hunts Grove (to the east) will have sufficient facilities to form a Second Tier settlement...*'

16.1.1.1. If Hunts Grove will form a Second Tier settlement then what happens to Hardwicke that is currently in tier 3??

16.2. Page 38 of the emerging strategy titled 'How have we tested the current settlement hierarchy?' states that '*...Much of the data contained in the 2014 study was derived from the 2011 census and it has not been possible to update some of this. However, in the 2018 Settlement Role and Function Study Update...*'.

16.2.1. I was unable to find the 2018 update on the SDC website. It appears that the Settlement Role and Function Study December 2014 data was used to inform the tiers review. Having looked at the study document it is obvious that the data used against the Hardwicke entries exclude significant important statistics and contains discrepancies.

16.2.1.1. For example Table 2(a): Settlement size and projected growth on page 9 is based on national statistics (ONS 2012 population projections) which are trend-based projections, un-manipulated and uncorrected to take account of local

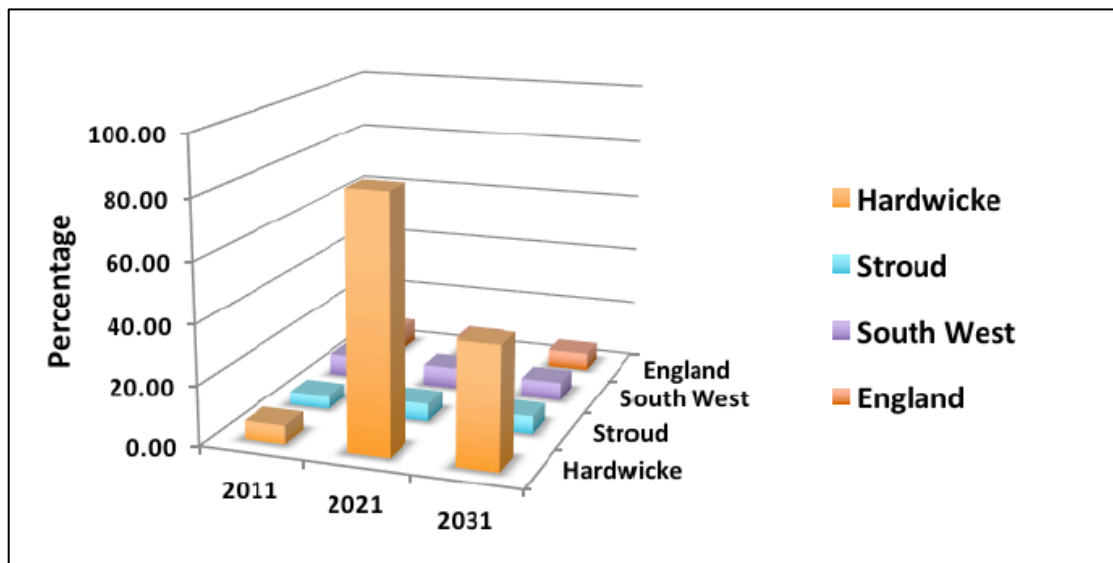
conditions and known influences. Previous growth trends are used to predict future population growth to 2031.

16.2.1.1.1. The Hardwicke entry shows a predicted population change from 3936 in 2011 to 4220 in 2031, a population increase of 286 (rounded to 290 in the table).

16.2.1.2. Hardwicke Parish Council Neighbourhood Development Plan 2015-2031 - Future Housing Assessment dated January 2017 used ONS2011 statistics, DCLG Household Projections and other housing related data to compare a number of key demographic and housing related aspects.

16.2.1.2.1. To accurately reflect future populations the assessment included committed and permitted developments since 2011, including Hunts Grove, to predict the future population of Hardwicke through to the end of the NDP period in 2031.

16.2.1.2.2. The NDP assessment shows a predicted population change from 3901 in 2011 to 10098 in 2031, a population increase of 6197. The chart below shows the predicted 10 yearly percentage growth compared with Local Authority, District and National equivalents.



16.2.1.3. This demonstrates a significant difference between the population figures used to inform the emerging strategy and the equivalent figures calculated to support the NDP.

16.2.1.3.1. The NDP assessment used 'Planning Advice Service (PAS) Neighbourhood Planning Advice Note' titled 'Housing Needs Assessment for Neighbourhood Plans' recommendations for its assessment. The inclusion of committed and permitted developments since the ONS survey in 2011 is the reason for the large discrepancy in 2031 population estimates.

16.2.2. To highlight the significance of this difference, if the NDP population predictions figures were used in the 'Settlement size and projected growth tables', then Hardwicke would be predicted to be the second largest community population in the district after Stroud in 2031.

16.2.2.1. Using the same basis in 'Table 4: Fastest growing settlements and their changing demography (projected)', Hardwicke would go from being the slowest growing settlement in the table to the fastest by some distance.

16.2.3. Another discrepancy is that Hunts Grove has its own entry in 'Table 5: Number of dwellings in each settlement (2001–2014)' when it is part of Hardwicke Parish therefore should be included in the Hardwicke figures.

16.3. It seems to me that if you know there are committed and permitted developments in the system then these should be used to inform any future strategy. The exclusion of this knowledge from the 'Settlement Role and Function Study December 2014' report means that the data used as the basis of the strategy is flawed.

16.3.1. These are significant discrepancies that can have tangible effects on the emerging strategy. I suggest that the statistics and methodology used in defining the settlement tiers be revisited and checked to ensure that all underlying assumptions stand up to scrutiny before inclusion in any draft Local Plan Update.

**17. Question 4.3b: Do you support the proposed approach to managing development at small Tier 4 and 5 settlements by including them within the hierarchy and defining Settlement Development Limits? Or do you support an alternative approach of simply treating them as 'open countryside'? What are the pros and cons of either approach?**

17.1. I support their inclusion in the hierarchy.

**18. Question 4.3c: Do you support the idea that the Local Plan should seek to manage the cumulative impacts of growth on individual settlements? How should we develop a policy framework to achieve this?**

18.1. I am surprised there is nothing in place to do so already. The first step would be to identify which generic potential impacts growth could have on a settlement.

18.1.1. The policy framework could begin by encouraging settlements to participate in the evaluation of their own settlement to provide a baseline against which future development will be considered. Criteria can then be derived to evaluate the level of impact growth has on a settlement.

18.1.1.1. Data can then be compiled over time to readily evaluate the cumulative impact growth has on a settlement's functionality, capacity and character.

18.2. It seems reasonable thinking that the centralisation of the data would enable a set of criteria to be agreed that would trigger the identification of infrastructure improvements for that community.

#### **Settlement development limits...**

**19. Question 4.4a: Do you support the emerging Strategy's approach towards maintaining settlement development limits?**

19.1. Supported

**20. Question 4.4b: Or do you support an alternative approach?**

20.1. No

**21. Question 4.4c: Do you support the proposals to allow some limited development beyond settlement development limits?**

21.1. I will say no, because I have little confidence that SDC will not use such an agreement to chase housing figures rather than manage the space from inappropriate development.

**22. Question 4.4d: Or do you support an alternative approach?**

22.1. No.

**23. Question 4.4e: Do you support the specific changes to existing settlement development limits that are set out in Appendix A? (Please clearly specify which settlement(s) your comment(s) relate to, and use the map's boundary change reference where relevant).**

23.1. SDL-HAR01 at Sellars Road in Hardwicke is supported.

**24. Question 4.4f: Do you support any other changes to settlement development limits, not listed in Appendix A? Please specify.**

24.1. No.

#### **Making places: mini visions and priorities for your area...**

**25. Question 5.0a: Do you support the proposed mini-visions for your area(s)? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).**

25.1. I support the main aspects of the Gloucester Fringe mini-vision however there is significant incongruence between the vision and the content of the Hardwicke entry below it.

25.1.1. Draft vision to 2040 states '*...Parishes on Gloucester's fringe will retain their distinctiveness and rural character, providing a valuable green hinterland to the city and a setting for the Cotswolds AONB...*'

25.1.1.1. This is directly contradicted by making the land surrounding Hardwicke village available for development. Area G1 on page 76 needs to be re-defined to ensure the setting of Hardwicke village is maintained to meet the vision or remove G1 completely from the emerging strategy.

25.1.2. Draft vision to 2040 states '*...Hardwicke's village character and sense of community will be preserved, while the area to its east sees continued housing and employment growth,...*'

25.1.2.1. This is directly contradicted by making the land surrounding Hardwicke village available for development. Development on area G1 on page 76 would destroy the character of Hardwicke Village along with any sense of village community. It is also contrary to the statement that the area to the east will be main area for residential and employment growth.

25.1.3. Draft vision to 2040 states '*...Hunts Grove will grow into a sustainable new community with a strong sense of identity, served by its own "village centre" and providing easy and convenient access to nearby jobs...*'

25.1.3.1. My understanding is that the a local service centre would be built at Hunts Grove to provide much needed facilities and infrastructure for the Gloucester Fringe (particularly Hardwicke) rather than to form its own 'village centre'.

25.1.4. Draft vision to 2040 states '*...Growth and development will be minimal outside of this 'strategic location'...*'

25.1.4.1. The strategic location refers to Hunts Grove. Once again G1 is a major development of 1600+ houses so how can this not be seen as being in total contradiction to the statement in the vision.

**26. Question 5.0b: Would you like to propose alternative wording for any of the mini-visions? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).**

26.1. For the Gloucester fringe vision I would suggest (changes in bold)

26.1.1. '*...Parishes on Gloucester's fringe will retain their distinctiveness and rural character, providing a valuable green hinterland to the city and a setting for the Cotswolds AONB.*

*At the urban fringe, particularly at Hardwicke, Hunts Grove and Upton St Leonards, the motorway will represent a distinct and defensible limit to southerly expansion.*



*Hardwicke's village character and sense of community will be preserved, while the area to its east sees continued housing and employment growth, and plays an ever more important role as a 'gateway' to Gloucester.*

*High quality design and improvements to transport and infrastructure will enhance the environment and quality of life for those living or working close to here, as well as improving the experience of those passing through. Hunts Grove will grow into a sustainable new community with a strong sense of identity, **providing the Gloucester Fringe settlements, particularly Hardwicke, with local services** and providing easy and convenient access to nearby jobs.*

*Growth and development will be minimal outside the Hunts Grove 'strategic location'.*

*Communities elsewhere will have the chance to help shape their neighbourhoods, protecting and improving those aspects of the area that make it special to them, and identifying needs and opportunities that will help to improve their sustainability.*

***Those identified through Neighbourhood Development Plans will be particularly supported....'***

**27. Question 5.0c: Do you support the identified key issues and priorities for action for your area(s)? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).**

27.1. Supported

**28. Question 5.0d: Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).**

28.1. None, already raised elsewhere.

