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Our ref: ThruppPB180118
Your ref:

Stroud District Council,
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Dear Sir or Madam,

**Representation to the Stroud District Council Local Plan Review (SDLPR)
Land at on the East Side of London Road**

This representation has been put forward to illustrate why Land on the east side of London Road, Thrupp, should be considered as a residential allocation in the Stroud District Local Plan Review Prefer Options.

The area of land was submitted as part of the SDLPR Call for Sites in December 2017. The site, which is identified in red on the attached location plan, should be considered available and suitable for housing within the next five years.

Due to the site's location it will allow for the linear settlement pattern to be maintained rather than pushing development higher up the valley where dwellings would be prominent and unwelcome. The site's location allows for access to a wide range of services and facilities in Thrupp, and there are a number of local, regional and national public transport routes readily available.

Land on the east side of London Road is in a sustainable location and is adjacent to the settlement boundary. Thrupp has been included with Brimscombe in the emerging settlement hierarchy raising it from a tier 4 settlement to a tier 3a settlement. Tier 3a settlements are classified as an accessible settlement with limited facilities which benefit from their proximity to higher order settlements and good transport routes. There is also a good range of services and facilities available. In addition, Thrupp is a relatively large employment area meaning the need for people to travel for work is reduced. Presently the emerging local plan promotes a number of allocations within Brimscombe rather than Thrupp. Therefore it is considered that some allocation should be directed towards Thrupp in part to recognise the settlement's raised position in the hierarchy.

The site allows easy access to Stroud, which is just over a mile away. Stroud is a tier 1 settlement and has a wide range of facilities and services. The site is also just under a mile from the Brimscombe port area which has a number of services including a public house, newsagents, a fish and chip shop and hairdressers. The Brimscombe port area is also currently planning for redevelopment to a mixed use scheme.

A desktop appraisal of significant issues on and around the site has been undertaken to inform this representation:

Drainage

The site is contained in flood zone 1 meaning there is little chance of flooding. There are no other known drainage issues.

Access

The site is located on the A419 with good visibility in either direction. Public transport is easily accessible from the site with a bus stop 300m to the north and another 200m to the south. There is also a National Express stop 2.4 miles along the A419 to the east, in Chalford which allows direct access to London Victoria in 2hr 40mins and Heathrow Airport in 2hr 10mins. Stroud Railway Station is also 1.3 miles away from the site. The station allows easy access locally to Stonehouse, Gloucester, Cheltenham and the wider rail network.

Heritage

There are no significant heritage assets in the locality of the site. The nearest assets are 0.1 miles to the south of the site and this is a Grade II listed mill. However, due to the curve of the road and existing residential dwellings, the heritage asset would not be impacted upon by development at our client's site. The site is also located opposite to the Industrial Heritage Conservation Area however there will be little if any impact on this heritage asset by virtue of proximity and the natural hedgerow screening.

Any further development will not erode the gap between Thrupp and Stroud, as existing residential and industrial development to the east and west of London Road already connects the existing built form of development between Thrupp and Stroud. The development of the site will simply follow the pattern of existing development and deliver a small scale residential scheme on shrub land that is currently underutilised. The site is in single ownership and is immediately available and deliverable over the next 5 years. For these reasons the site would make an appropriate residential allocation.

Current Allocations

There are currently three allocated sites in the Brimscombe and Thrupp area. All three of these sites are located in the bottom of the valley in the Industrial Heritage Conservation Area and, as previously stated, focus development more towards Brimscombe. These sites are also allocated in the Stroud Local Plan for Regeneration of Existing Employment Sites.

Site PS01, at Brimscombe port, is completely located within flood zone 3, there are also a number of grade II listed buildings on site including a number of old mill buildings and areas of the port. The development of this site would also include the loss of existing employment land in an area that has been praised, given its ranking in the settlement hierarchy, for its ability to not solely be a dormitory settlement. It will also be moving businesses, such as the widely used Rush Skate Park, away from the area. This site is also in very close proximity to the railway, which experiences both passenger and freight train traffic, meaning residential buildings on the site will experience excessive noise.

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?

The identified issues seem a reasonable approach in particular by ensuring that new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development.

Question 1.0b Do you agree with the ways we intend to tackle these issues?

The approach is agreed, however the distribution of allocations has missed Thrupp, and growth should be supported in the settlement to recognise the new position in the settlement hierarchy.

Question 2.3a Do you agree with the ways in which the emerging Strategy intends to meet local housing need?; and Question 2.3b Do you support an alternative approach? Or have we missed anything?

Housing is best allocated where it has good access to a variety of different services and good access to public transport. We consider the approach is correct to meet local housing need, but consider small housing allocation, in small settlements will maintain the vitality and vibrancy of the settlement. In this case it is considered an opportunity is being missed to add to the vitality of Thrupp.

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?

We agree with this in part noting our comments above. Growth around the large settlements is necessary and these locations should be the primary direction for growth. However the growth of small rural settlement should not be discounted and paragraph 83 and 84 of the NPPF support the growth of the rural economy which will best occur with planned residential development to support the economy.

Question 4.2b Do you support an alternative strategy approach?

We consider redistribution of allocations would better balance the drive for encouraging viability across a wider area.

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 correct that Thrupp has been included with Brimscombe in the settlement hierarchy raising its tier for 4 to 3a. However it is considered that given the change in tier housing should be allocated more towards the Thrupp area rather than keeping a focus on Brimscombe.

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

Development beyond settlement limits is welcomed. However rather than have a settlement limit approach to a limited amount of development, an alternative approach would be to determine each proposal as it comes forward on its sustainable merits and the quality of the scheme.

Question 4.4f Do you support any other changes to settlement development limits, not listed in Appendix A? Please Specify

We believe the settle development limits should be changed along the A419 to incorporate the existing commercial and residential uses found on the south side of the road. This would allow for this development to be better reflected on the north side of the road and allow for further dwellings to support these commercial businesses.

In summary Bruton Knowles consider the site is within a sustainable location and is available and deliverable over the next 5 years.

Should you have any queries please let me know.

Yours sincerely



