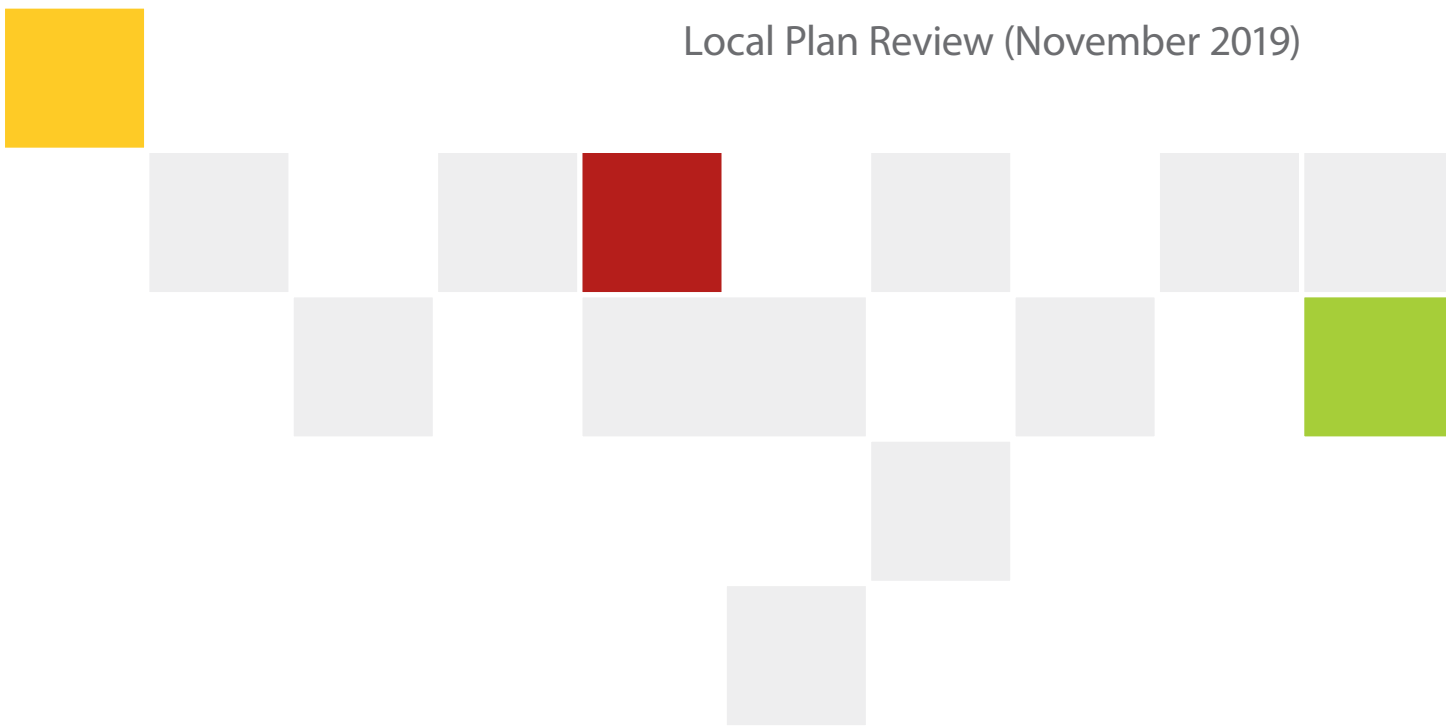


# Stroud District

Local Plan Review (November 2019)



# Boyer

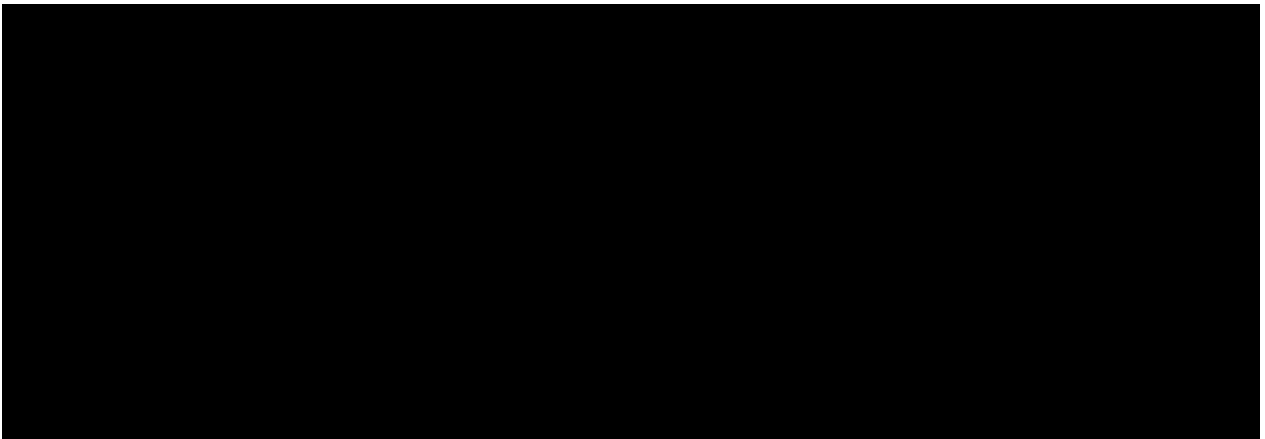
**STROUD DISTRICT**

**LOCAL PLAN REVIEW**

**BOYER ON BEHALF OF REDROW HOMES LTD**

**JANUARY 2020**

Report Control





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## **APPENDIX**

Appendix One – Site Location

Appendix Two – Site Promotion Document

## 1. INTRODUCTION

- 1.1 Boyer is instructed by Redrow Homes Ltd to submit representations in response to the Stroud District Local Plan Review draft consultation (November 2019). Prior to this consultation, representations were submitted on behalf of the landowners, [REDACTED] in response to the 'Emerging Strategy' consultation [REP ID: 00533] which ran from the 16<sup>th</sup> November 2018 to the 18<sup>th</sup> January 2019. The land, situated north of Charfield Road, Kingswood, is now controlled and being promoted by Redrow. The site is indicated on the location plan included in Appendix 1.
- 1.2 This current consultation is intended to provide the opportunity to 'check' that the emerging Plan is the right plan for the District, prior to the Regulation 19 Pre-submission consultation, currently scheduled to commence in the autumn of 2020.
- 1.3 This additional round of consultation, in advance of the Pre-Submission stage, is welcomed as it provides the opportunity identify concerns related to the soundness of the emerging Plan.
- 1.4 The comments provided herein set out the changes we consider represent appropriate and necessary revisions to the strategy and critically, provide for genuine development opportunities not currently identified, in a manner that is consistent with the overarching objectives of the Plan.
- 1.5 The National Planning Policy Framework (NPPF) (paragraph 77) recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements and extensions to existing towns and villages, provided they are well located, designed and supported by the necessary infrastructure and facilities.
- 1.6 Alongside this, the NPPF (paragraph 77-78) also states that in rural areas, planning policies and decisions should be response to local circumstances and support housing development that reflect local needs, with development located where it will enhance or maintain the vitality of rural communities. Planning policies should provide opportunities for villages to grow and thrive, especially where this will support local services.
- 1.7 It is recognised that the emerging Plan includes a significant number of strategic allocations, alongside two new settlement locations. As a matter of principle, such an approach is consistent with national policy.
- 1.8 The Settlement Hierarchy, in our opinion, is based on a review of the role and function of settlements which is too narrow and fails to provide an accurate assessment of individual settlements. Moreover, it is considered that the Settlement Hierarchy is applying an artificial and unjustified constraint to genuine development opportunities at lower tier settlements.
- 1.9 We also consider that the reliance on specific development locations within the emerging Plan lacks sufficient detail and justification to support their inclusion as sound component of the development strategy. Moreover, the pace and rate of delivery of specific development locations, principally the Sharpness New Settlement, does not, in our view, provide a realistic and deliverable rate of delivery.

## 2. REDROW LAND INTERESTS

- 2.1 Land controlled by Redrow Homes Ltd is promoted within these representations as a genuine development opportunity that can provide for sustainable patterns of development and facilitate the delivery of wider community benefits, specifically in respect of primary school provision.
- 2.2 The land controlled by Redrow in Kingswood is located north of Charfield Road (Appendix 1) and comprises 4.5 ha of land adjacent to the existing western edge of Kingswood, with potential for further expansion to the west.
- 2.3 Included in Appendix 2 is a promotion document that summarises the key opportunities the site presents to Kingswood in response to challenges for sustainable future growth, namely the opportunity for a new primary school, in response to the existing Kingswood Primary School capacity issue.
- 2.4 The scheme being promoted by Redrow has evolved from a purely residential scheme, to one with significant public benefit including potential for a new primary school and playing fields along with provision of public open space and pedestrian and cycle links (including between the village and Renishaw employment use).
- 2.5 The site promotion options have been influenced by extensive and on-going engagement with the District and Parish Councils, Local Education Authority and Kingswood Primary School Governors. Most recently we were grateful of the opportunity to present our options to members of the public at a Kingswood Parish meeting on the 20<sup>th</sup> January 2020 to discuss the Local Plan Review.
- 2.6 From our engagement with key stakeholders we are aware of the school capacity issue faced by Kingswood. This is reinforced in the draft document subject to this consultation, which identifies growth of 50 dwellings subject to *'the satisfactory resolution of existing school capacity issues at Kingswood'*.
- 2.7 The existing Kingswood primary school is physically at its limits and unable to expand. The other sites being promoted in Kingswood, including that currently included within the draft plan (PS38 South of Wickwar Road), do not offer an appropriate or sustainable solution to the school capacity issue and would lead to primary age school children being accommodated at schools some distance from Kingswood Village. Accordingly, the land being promoted by Redrow offers the opportunity, depending on the options taken forward, to either facilitate or provide for a new primary school actually within Kingswood.
- 2.8 In recognising the significant issues facing the primary school and therefore the community, the Parish Council has investigated the potential to identify and secure a site for a new primary school. To-date, this has been unsuccessful. The land being promoted by Redrow is considered to be the only option available with enough space capable of delivering a new school and accordingly the only viable and sustainable option for the future growth of Kingswood.

2.9 The current preferred option for allocation (PS38 South of Wickwar Road), is identified as such as it is considered to have lesser landscape impact than other options within the village. This is based upon a high level assessment (Stroud District Landscape Sensitivity Assessment (December 2016)) and the promotion document, informed by technical assessment, explores the constraints and opportunities in further detail.

2.10 Three options are presented are summarised as follows, with further detail illustrated in Appendix 2:

- Option 1: 100 dwellings
- Option 2: 100 dwellings plus land for a primary school
- Option 3: 300 dwellings plus delivery of a primary school

### 3. THE DEVELOPMENT STRATEGY AND SETTLEMENT HIERARCHY

- 3.1 The Development Strategy is intended to deliver the Local Housing Needs Assessment (LHN) minimum requirement of 638 dwellings per annum for the District to 2040 (12,800 dwellings). This is capped at 40% above the latest housing requirement (456 dwellings per annum) as the plan was adopted within the last five years. Current rates of delivery equate to 437 dwellings per year (2006-2019).
- 3.2 It is recognised within the LHN Background Paper that the Government has confirmed its intention to comprehensively review the standard method during 2020 and that in such circumstances it may be necessary to update the LHN in order to adopt any changes to the approach to calculating housing need.
- 3.3 It should be noted that the LHN represents the minimum level of need and future changes to the standard method may result in a further uplift as the calculation is revised to ensure the national level of house building can be achieved.
- 3.4 It is stated at paragraph 2.12 of the Plan that the development strategy supports the development of inclusive, diverse communities, with housing and employment in close proximity and good access to wider services and facilities, as key component of the strategy to reduce carbon footprint and to improve the District's self-containment. Yet the strategy is focused mainly at established top tier settlements/and or reliant on substantial development from two new settlements.
- 3.5 The NPPF (paragraph) is clear that planning policies should provide the opportunity for rural areas to grow and thrive, especially where this will support local service. Yet the plan proposes a quantum of development to lower tier settlements which, in our view, imposes a Development Strategy that curtails the ability of such settlements to grow and thrive as required by the NPPF.
- 3.6 The Development Strategy is premised on the basis of "lesser levels" of growth being directed to Tier 3a villages, even though the Plan [paragraph 2.16] acknowledges that many of these locations have a range of local facilities and / or benefit from good transport links to strategic facilities at nearby towns of Stroud and Wotton-under-Edge.
- 3.7 Core Policy CP3 (Settlement Hierarchy) seeks to justify the basis of the classification of settlements within the hierarchy. It explains that Tier 3 settlements are generally well-connected and accessible places and that some of these settlements may have scope to help meet the housing needs of more constrained Tier 1 and Tier 2 settlements. However, CP3 then concludes: *"their scope for future growth (in addition to any sites already allocated in this Plan) is constrained. Further development will be focussed inside settlement development limits..."*



- 3.8 Such a conclusion is not supported and we note that there is no specific evidence presented in support of this Plan to demonstrate why the scale of allocations proposed at Tier 3a settlements represents the full extent of any development capacity at these locations.
- 3.9 On behalf of Redrow Homes Ltd we are promoting through this plan a suitable and deliverable development opportunity at Kingswood. Accordingly we have reviewed the evidence base as far as it relates to the decision making process for allocations at Kingswood as a Tier 3a settlement. This is set out in the following Section.

## 4. KINGSWOOD

- 4.1 The distribution of growth across the District is informed by the Settlement Hierarchy and the Plan (paragraph 1.9) explains that: *“One of the primary aims of establishing a settlement hierarchy is to promote sustainable communities by bringing housing, jobs and services closer together, in an attempt to maintain and promote the viability of local facilities and reduce the need to travel to services and facilities elsewhere.”*
- 4.2 Such an aim is supported as a matter of principle, but we do not consider that this is reflected in the approach to development at Kingswood. Core Policy CP3 classifies Kingswood as an ‘Accessible Settlement with Local Facilities’ (Tier 3a), recognised as being a well-connected and accessible settlement, but where the Plan considers the scope for future growth is constrained, specifically in addition to sites already allocated within the Plan.
- 4.3 As a Tier 3a settlement Kingswood is proposed to accommodate a single allocation of 50 dwellings on land South of Wickwar Road [PS38]. Alongside the residential allocation, land is also proposed to be allocated to the west of Renishaw New Mills for 10ha of employment as an extension to this established ‘Key Employment Site’ [PS47].
- 4.4 Redrow fully support the proposed employment allocation at Renishaw New Mills and believe that it must be considered in the context of the Plan’s approach and proposals in other parts of the District. For example, the Sharpness New Settlement Location is identified to provide for 2,400 new homes by 2040 and alongside this the Plan proposes to include employment provision of 10ha. There is evidently no specific alignment between homes and jobs which is purported to be one of the primary aims of the Settlement Hierarchy.
- 4.5 The classification of Kingswood as a Tier 3a settlement is informed by the **2014 Settlement Role and Function Study** and the corresponding **2018 Update**. It is explained in the Plan that the 2018 Update informs the current and expected future role and function of each of the main towns and villages in the District, in order to determine which places can support future growth and which places cannot. It therefore represents a key part of the evidence base and the spatial distribution of development proposed in the Plan.
- 4.6 In the context of Tier 3a settlements, the Plan (paragraph 2.26) explains that *“fewer and smaller”* development sites are proposed which are focused on meeting local housing needs and on enhancing or delivery new services and facilities which have been identified as lacking. The Plan makes it clear that: *“The focus will be on using development to overcome existing infrastructure deficiencies and to deliver enhancement to places.”* (Our emphasis)
- 4.7 There is no reference to the proposed expansion of the Renishaw New Mills Key Employment Site and the extent to which this has informed the scale of housing proposed at Kingswood. It is our view, that employment land at Renishaw New Mills has been considered in isolation of the role and function of Kingswood in order to remove any alignment between homes and jobs.

- 4.8 The Plan is at pains to classify Kingswood as a 'dormitory' settlement in order to justify the notional level of additional housing being proposed. In reality, Kingswood is a Tier 2 settlement as it has the relevant facilities and services that support this role (as this statement explains in further detail below). We support the extension to employment proposed by Draft Policy PS47, however, housing provision should be proportional to allow new housing in Kingswood to support the employment expansion and to reduce distance of travel to the employment use.
- 4.9 The specific reference in the Plan to using development as a mechanism to overcome existing infrastructure deficiencies etc (see paragraph 4.6 above) would be supported if this was to translate into specific development opportunities that fulfil this ambition.
- 4.10 In Kingswood, it is widely understood that there are significant challenges with primary school provision at Kingswood Primary School which is currently at capacity and the options for expansion area extremely limited by the school site itself.
- 4.11 The Gloucester County Council School Places Strategy 2018-2023 (November 2018), recognises capacity issues at Kingswood Primary school and the school's site restrictions, meaning that it is necessary to discuss with developers as to how they will make provision available locally (Page 156 of GCC School Places Strategy 2018-2023 – Nov 2019).
- 4.12 Access to, and the ability to enhance/sustain education provision should, in our view, form an important consideration in the assessment of sites as potential development locations, particularly relevant at Kingswood given the identified issues.
- 4.13 However, the Council's Sustainability Appraisal (2019) explains that: *"Due to the sensitivity of data regarding school's capacity it has not been possible to consider this issue in relation to individual draft site allocations included in the Draft Plan."* (Our emphasis)
- 4.14 We question why this is the case, particularly at Kingswood where the capacity issues are widely understood. Moreover, within the SA itself it states:
- "In the Wootton-under-Edge area, new housing developments local to Kingswood Primary School should be monitored as there are short term capacity issues due to this school's site restrictions. There is likely to be a requirement to continue to hold discussions with developers to inform how they will make provision available locally. There may be primary school capacity within the wider planning area, at Wotton-under-Edge, however, this would require parents and children to travel out of Kingswood village for primary education."* (2019 SA – paragraph 5.33)
- 4.15 There is a clear expectation, both within the County Council School Places Strategy and the Council's SA that any development any Kingswood should provide appropriate solutions to address capacity constraints at Kingswood Primary School.
- 4.16 However, the single Kingswood allocation of 50 dwellings (PS38 – South of Wickwar Road) appears to have little or no regard to the challenges associated with education provision at the Kingswood Primary.

- 4.17 Appendix 7 of the 2019 SA provides the detailed matrices for sites proposed to be allocated in the emerging Plan. It is important to note that the approach of the SA regarding education is to include this within SA objective 17 (Economic Growth) on the basis that this objective includes the consideration of whether a site promotes access to education facilities for residents (SA17.4).
- 4.18 The Kingswood allocation on land South of Wickwar Road (PS38) is give a “+?” Score, justified on the basis that: *“The site is located within 800m of at least one primary school but is not within 800m of an existing secondary school.”* This scoring does not take into account capacity of primary school provision in the locality, i.e. Kingswood Primary School, and the reality that new pupils generated by this development would be required to travel to primary school provision further afield, potentially those located within Wotton-under-Edge. This is not reflected in the SA scoring.
- 4.19 It is noted that PS38 is allocated *“subject to the satisfactory resolution of existing school capacity issues at Kingswood.”* Yet there is nothing within the requirements of PS38 that provides for any solution to address the capacity issues at Kingswood Primary School. There is therefore an inconsistency with the premise of the Development Strategy and the proposed allocation at Kingswood. PS38 does not implement the objectives of the Development Strategy as it provides no solution to address the capacity issues at Kingswood School.
- 4.20 The Plan should be explicit as to what constitutes a ‘satisfactory resolution’ in order to determine whether this allocation can be considered to be appropriate and deliverable within this context.
- 4.21 The ability to put in place an effective strategy for Kingswood, to respond to the pressures at the primary school, will depend upon the wider strategic approach to development and the justification for the scale of development at this settlement.
- 4.22 Limiting development at Kingswood to just 50 dwellings has two fundamental flaws. First, this scale of planned growth frustrates the ability of the Plan to implement effective and deliverable solutions to address identified capacity issues associated with Kingswood Primary School. Proposed allocation PS38 provides no solution to this identified constraint.
- 4.23 Second, limiting development to 50 additional dwelling to 2040 bears no resemblance the sustainability credentials of Kingswood and its capacity to provide for meaningful scale of development in manner that is consistent with its role and function and relationship to other major centres of employment and the main town of Wotton-under-Edge.
- 4.24 When considering the scale of development at settlements, the findings of Settlement Role and Function Study (2014 and 2018 Update) are of direct relevance in this case.
- 4.25 Table 6 of the 2018 Update ranks the District’s settlement from “best” to “worst” according to their accessibility score. As shown within this Table, Kingswood is identified as one of the best performing settlements.

Table 6: Ease of access to key services and facilities, based on average travel times from sample postcodes<sup>†</sup> within each settlement (2016)

Settlements in Stroud District	Overall rating	Overall score **	Total score (by bus / on foot) †	Total score (by drive / on foot) †	Post office		Super-market		Library		Primary school		Secondary school		FE College (inc. 6 <sup>th</sup> form)		GP		Pharmacy		A&E or MIU		Current classification in the Settlement Function Hierarchy	
					Drive	Bus/walk	Drive	Bus/walk	Drive	Bus/walk	Drive	Bus/walk	Drive	Bus/walk	Drive	Bus/walk	Drive	Bus/walk	Drive	Bus/walk	Drive	Bus/walk		Drive
Dursley		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Tier 1
Cam		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Tier 1
Stroud		1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	Tier 1
North Woodchester		1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	Tier 3
Wotton Under Edge		2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	Tier 2
Thrupp		2	0	2	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0	0	0	Tier 4
Kingswood		2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	Tier 3
Stonehouse		3	0	3	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2	Tier 1
Selsley		3	0	3	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	1	Tier 4

Source: Page 33 of Stroud District Settlement Role and Function Study – Update 2018

- 4.26 Kingswood achieves an overall rating of ‘V.Good’ with access to a range of services and facilities achievable within an average travel time of less than 15 minutes. The only exception to this relates to access to A&E/MIU, where average journey times are less than 30 minutes. Kingswood out-performs the Tier 1 settlement of Stonehouse and a number of Tier 2 settlements, such as Nailsworth and Minchinhampton.
- 4.27 Alongside the strong performance of Kingswood in terms of accessibility to services and facilities, this settlement is also one of the best performing settlements in terms of its employment role.
- 4.28 Table 7 of the Study Update sets out the employment role of the settlements within the District and concludes that Kingswood has a **strong** employment role and contributes to **significant** number of jobs locally.

Table 7: Summary of employment role and function (2018 update)

Settlements in Stroud District	Summary of employment role and function
Stroud	The District’s most significant employment base, providing 11,000+ jobs
Stonehouse	A very important employment role: home to 7,000+ jobs and a big net importer of workers
Dursley	An important employment role: 2,000+ jobs and one of our main employment hubs
Nailsworth	An important employment role: 2,000+ jobs and one of our main employment hubs
Cam	A significant employment hub (-2,000 jobs), but also one of our biggest ‘dormitories’ (a big net exporter)
Wotton Under Edge	A significant provider of 1,000+ jobs
Hardwicke	The surrounding locality is a significant focus for 1,000+ jobs, but the settlement is also a big ‘dormitory’
Brimscombe	A significant provider (1,000+ jobs), part of the valley bottom employment hub, and a net importer
Kingswood	A significant provider (1,000+ jobs) and a significant importer of workers. Jobs : Workers ratio of 1.6 : 1
North Woodchester	Woodchester contributes to the valley-bottom employment hub and the area is a net importer of workers
South Woodchester	Woodchester contributes to the valley-bottom employment hub and the area is a net importer of workers
Thrupp	A significant provider, part of the valley bottom employment hub
Chalford	Contributes to the valley-bottom employment hub, but the settlement’s main role is as a ‘dormitory’
Painswick	Has a small employment role, but this is not the village’s principal role

- 4.29 Kingswood has a strong economic role and the 2018 Study notes that alongside Stonehouse and Brimscombe, Kingswood is one of a very limited number of settlements which is a net importer of workers, with other settlements in the District all seeing a substantial out-flow of residents who work elsewhere. Kingswood has a 1.63 jobs per economically active resident, a ratio which is only bettered by Stonehouse.
- 4.30 Unlike the majority of the District's smaller settlements which offer very little for their residents, who are then compelled to out-commute, this is not the case at Kingswood. Moreover, the Plan proposes to allocated land for a significant expansion of the Renishaw New Mills (10ha) [PS47] which further strengthens the settlements importance in terms of its employment role.
- 4.31 Section 7 of the 2018 Study Update sets out settlement summaries for the District Settlements. This notes between 2011 and 2018 an additional 33 dwellings have been delivered which represents a scale of growth (6%) that aligns with the overall scale of growth across the District over the same period.
- 4.32 The Study [page 94] then explains that as a Tier 3 settlement, average or slightly above average proportional growth could reasonably be expected at Tier 3 settlements. The Study also notes that as at April 2018 a further 54 dwellings were in the pipeline and if these were delivered it would constitute a relatively high proportion of growth at Kingswood (up 16% since 2011).
- 4.33 Such an approach, if this is determinative in the distribution of growth across the District, is not considered sound. It represents crude and arbitrary approach that has little regard to the role and function of settlements. Distribution of development, informed by what is considered to 'proportional' lacks the necessary detailed approach to housing distribution, one that should respond to opportunities as well as identified constraints.
- 4.34 The proximity of Kingswood to the M5 (J14) and connections to Bristol does facilitate out-commuting. The Study explains that 43% of workers work within Stroud, compared to the average level of 54%. The most common workplace destination is Bristol and South Gloucestershire with 38% of Kingswood working population commuting to these destinations.
- 4.35 It is on this basis that the Plan seeks to constrain development at Kingswood on the basis that the Plan considers the settlement's principal role is as a dormitory settlement. Yet out-commuting is not a unique issue to Kingswood. The Stroud Sustainable Transport Strategy (November 2019) acknowledges that there must be recognition that there is high demand for longer distance travel which needs high quality public transport to meet this demand.
- 4.36 To artificially constrain development as a strategy for addressing or reversing the 'dormitory' function of a settlement is not supported. The emphasis should be on the delivery of positive infrastructure improvements to provide alternative transport methods as part of a wider package to improve self-containment within the District, whilst recognising the wider regional context and realities that residents will out-commute.

- 4.37 It is evident that Kingswood is a high performing settlement in terms of access to services and facilities and through our review of the 2018 Study we question whether the final categorisation of Kingswood as a Tier 3a settlement represents an accurate reflection of the sustainability credentials of this settlement.
- 4.38 It is noted that Table 5 of the Study Update states that Kingswood does not have a secondary school which was based upon the absence of such provision within the parish boundary at the time of publication of the draft Local Plan (November 2019). This was illogical and failed to recognise that the Katherine Lady Berkeley's School is located within 500 metres of the defined settlement boundary and is physically closer to Kingswood than it is the Wootton-under-Edge.
- 4.39 Notwithstanding this somewhat dogmatic adherence to the Study's methodology which has led to the functional role of Kingswood not being adequately understood, it should be clear that the Parish Boundary has subsequently been subject to amendments. Specifically, this means that, following a resolution by the District Council on 19<sup>th</sup> December 2019, the Katherine Lady Berkeley School is now located within Kingswood Parish which further supports our belief that Kingswood should be a Tier 2 settlement.
- 4.40 In a similar way, the Study also concludes that the settlement is not served by sports/recreation, once again failing to recognise the proximity of the Wotton Sport Centre. Such an approach has implications for the classification of Kingswood and it is noted that within the final comparison matrix table, Kingswood is identified as having no strategic services and facilities. A conclusion which does not reflect the proximity of such provision to the settlement by virtue of defined parish boundaries.
- 4.41 Kingswood performs strongly across all considerations and would, in our view, justify its classification as a Tier 2 settlement, rather than Tier 3a. The availability of strategic services and facilities, contrary to the findings of the 2018 Update Study, alongside the high performance of this settlement in terms of accessibility to a wide range of services and facilities and its strong employment function, demonstrates that Kingswood should be classified as a Tier 2 settlement.
- 4.42 It is noted that Frampton on Severn, classified as a Tier 2 settlement in the current Local Plan, is re-classified as a Tier 3a settlement owing to its rating of "very poor" in terms of its access to services and facilities. If Tier 3a is appropriate for a settlement that scores "very poor" then this raises questions as to why a settlement which scores "very good" is retained within the same classification. Kingswood significantly out-performs Frampton on Severn yet it is retained as a Tier 3a settlement. Such an approach lacks consistency and reinforces our view that development at Kingswood is being artificially constrained.
- 4.43 The relationship and proximity of Kingswood to Wotton-under-Edge is also an important consideration which does not appear to feature in the Development Strategy insofar as it relates to Kingswood.

- 4.44 Wotton-under-Edge is one of the District's main towns and provides a wide range of services and facilities. However, this settlement is significantly constrained in terms of environmental, physical and topographical constraints which the 2018 Update Study recognises makes significant expansion difficult.
- 4.45 The potential therefore exists for Kingswood to contribute to the growth needs arising from the settlement itself as well as Wotton-under-Edge where development opportunities are far more constrained, even though the town is one of the District's main settlements.

**PS38: Land South of Wickwar Road**

- 4.46 It is evident from our review of the District's Settlement Role and Function Study that Kingswood is a high performing settlement which has the potential to make a meaningful contribution to housing delivery within the District. However, the emerging Plan limits planned additional development to a single allocation on land south of Wickwar Road (PS38 – 50 dwellings).
- 4.47 For reasons set out within these representations, such a limited scale of development does not, in our view, accurately reflect the sustainability credentials of this settlement and its capacity to accommodate development over the Plan period.
- 4.48 PS38 does not provide an appropriate allocation for Kingswood. It fails on the basic principle and requirement of the Plan to provide a resolution of the existing school capacity issues at Kingswood Primary School. It is expressly stated within the Plan that this allocation is subject to a satisfactory resolution of these capacity issues.
- 4.49 The land south of Wickwar Road (PS38) is being promoted by Persimmon for circa 55 homes and without a solution to school capacity issues. The size of the site means that it is physically unable to provide an opportunity for a new primary school, a fact that was confirmed by Persimmon at the Parish Council's public meeting on 20<sup>th</sup> January 2020.
- 4.50 If developed, this site and its new residents will have no option but to travel out of Kingswood to access primary school provision, with the nearest alternative being Blue Coat Church of England Primary School in Wotton-under-Edge, which, due to distance and topography is unlikely to be walked to from Kingswood and would be dependent on bus or private car. Given that it is a stated aim of the plan to reduce the need to travel, a development option that runs counter to this objective lacks any credible justification. Such a scenario cannot be considered to represent a "satisfactory resolution." and is not a sustainable solution. The capacity of Kingswood Primary School is an existing issue that needs to be resolved locally, with a new school in Kingswood.
- 4.51 This allocated site forms part of the SALA site KIN005. The 2017 SALA assessment identifies that access to the site will require the demolition of existing dwelling (24 Wickwar Road) in order to ensure the site can achieve access on to the B4060 Wickwar Road.



- 4.52 We have serious questions that suitable access to the site can be secured and our review of land titles indicates that the promoter of this site, Persimmon Homes, does not have control of land necessary to ensure appropriate access arrangements can be provided to serve this site. This is a matter which requires immediate attention in order to ensure that the allocation is actually deliverable.
- 4.53 Furthermore, it is noted that the 2019 SA (Appendix 7) sets out the assessment of this site against the SA objectives. It is interesting to note that within this matrix it is stated that the site will now be required to include “community uses”, although these are not defined. Furthermore, the site will also be required to incorporate strategy landscaping. Given the size of this site this leads to genuine concerns that the full quantum of development proposed (50 dwellings) can actually be achieved.
- 4.54 We are concerned that the limited scale of planned development at Kingswood is inconsistent with the evidence base and the capacity of the settlement to accommodate growth. Specifically in terms of the proposed allocation, we have genuine concerns that this site can deliver the quantum proposed and whether in fact, suitable access to the site can be secured. Irrespective of this site specific issues, PS38 fails to provide for any appropriate resolution to capacity issues and Kingswood Primary and therefore, its inclusion as an allocation in the first instances lacks sufficient justification.
- 4.55 Wider opportunities for development at Kingswood do exist and land promoted by Redrow Homes can provide for a comprehensive development scheme that is commensurate with the role and function of Kingswood, whilst also providing a specific and tangible resolution to capacity issues and Kingswood Primary School.

## 5. NEW SETTLEMENTS

5.1 In preparation of the Plan, a series of development strategy options were considered. Option 4 is premised on the identification of growth points in the District, either as an expansion or an existing settlement, or the creation of a new settlement. A key component of the Development Strategy is the inclusion of two new settlements, Sharpness (PS36) and Winsloe (PS37).

5.2 As a matter of principle the inclusion of new settlements to meet the strategic housing need of the District is consistent with the NPPF (paragraph 72). However, the caveat to this is that such options should be well located and designed and supported by the necessary infrastructure and facilities.

### **Sharpness**

5.3 The current version of the emerging Plan is not supported by sufficient evidence to demonstrate that the new Settlement at Sharpness (PS36) can deliver at the rate envisaged in the Plan and critically, that it represents a sustainable development option.

5.4 Daft Policy PS36 simply states that: *“Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements.”* The absence of such information raises genuine questions regarding the robustness of the current evidence base to support this allocation as currently proposed.

5.5 The Strategy Options Discussion Paper July 2018, acknowledges that a Development Strategy premised on Growth Points/New Settlements based on existing travel patterns *“indicate this location to be the least sustainable in terms of alternatives to the car. However, the scale of growth may provide the opportunity for a step change in passenger transport provision.”* (See paragraph 7.4.1) (Our emphasis).

5.6 This explains why the current wording of P36 makes explicit reference to a new railway station and rapid bus services to the nearest main settlements. Without such provision, it will result in an isolated and remote development location that would, in our view, fail to accord with the basis of the Settlement Hierarchy, namely to ensure that development reduces the need to travel and promotes sustainable communities.

5.7 The New Settlement at Sharpness should be seen in the context of the extant allocation at Sharpness Docks (SA5). The Inspectors Report (paragraph 132) into the current Local Plan recognised that Sharpness/Newtown has relatively poor accessibility to a range of strategic facilities normally associated with a strategic development at this location. Notwithstanding this, the IR concludes that it was *“special case”* which provided a ‘bespoke solution to a unique opportunity to regenerate Sharpness Docks.’ To date extant allocation SA5 has failed to deliver.

- 5.8 Notwithstanding the 'unique' circumstances pertaining to the allocation of Sharpness Docks, the remoteness of this area to a range of strategic facilities persists. This is recognised with the Sustainability Appraisal where it concludes that Sharpness is *"not well related to existing services and facilities, town centres and important employment centres."* (SA – paragraph 5.27).
- 5.9 Moreover, the Stroud Sustainable Transport Strategy (November 2019) acknowledges that this location *"has issues of relative remoteness, particularly in public transport terms"*.
- 5.10 The decision to allocate land for new settlement at Sharpness is premised on the assumption that the scale of development will provide the critical mass to support the delivery of services and facilities, including sustainable transport infrastructure and employment land, in line with Garden City principles, thereby achieving a modal shift. Notwithstanding this, the Council's Sustainability Appraisal (paragraph 6.39) acknowledges that: *there is a possibility that residents will have inadequate access to services and facilities during the early stages of development, which may result in a need to travel further afield using private car trips, result in decreased air quality in the short term.* (Our emphasis).
- 5.11 Although this is set within the context of air quality, it demonstrates that development at sharpness represents an inherently unsustainable development location, unless it is supported by significant infrastructure provision to address these short-comings.
- 5.12 The SA considers that the existing relationship / accessibility to services and facilities would result in a significant negative effect. However, the SA seeks to off-set these significant negative effects by concluding that owing to Garden City principles it would result in significant positive effects. The reliance, or rather dependency, on the achievement of these new settlements being delivered in accordance with Garden City principles, does not provide the necessary justification for their inclusion within the plan at this stage.
- 5.13 The ability of Sharpness to deliver sustainable patterns of development is entirely dependent upon public transport investment to provide a realistic travel choice. Paragraph 5.27 of the 2019 SA states that: *"The new settlement at Sharpness would provide significant new sustainable transport improvements (including a new rail station and rapid bus services)"*.
- 5.14 The Stroud Sustainable Transport Strategy (November 2019) outlines the 'sustainability measures' required and this includes direct and attractive public transport services to key destinations, including Bristol and Gloucester, which are needed from very early in the development phasing to ensure that sustainable travel patterns can be established for new residents.
- 5.15 CP6 (Infrastructure and developer contributions) states that the Council will work with partners to ensure that infrastructure will be in place at the right time to meet the development needs of the district and to support the Development Strategy. In this context CP6 refers to the preparation and regular review of the Infrastructure Delivery Plan (IDP), which will set out the infrastructure to be provided.

- 5.16 Yet, this version of the Plan is not supported by any draft of the IDP, therefore critical issues such as the identification of what infrastructure is required is currently not available. Moreover, issues related to infrastructure costings, timings and funding mechanism are yet to be presented in any way that provides the comfort that there is a realistic prospect that sites allocated in the plan, specifically New Settlements given their dependency on such infrastructure, can deliver the necessary infrastructure required to achieve sustainable patterns of development.
- 5.17 In response to the Emerging Strategy consultation (November 2018 – January 2019 Stagecoach West (Rep ID 00594) raised serious concerns regarding the ability of a New Settlement at Sharpness to provide the critical mass to justify the commercial operation of even an hourly bus service to Stroud, even in circumstances where the demand from the current population is factored in. The Stagecoach Reps also noted the reality of the travel demands are such that these will be split across of number of relatively distant journey destinations, such that there would be insufficient critical mass of demand for passenger transport on any corridor. The Stagecoach representations conclude:
- “We see no evidence provided to support the inclusion of a new settlement at Sharpness in a sustainable development strategy for the district, and its continued inclusion is in every sense unjustified and quite anomalous. Its allocation simply does not follow from the evidence presented in support of the emerging preferred option.”*
- 5.18 No specific evidence has been prepared since the Emerging Strategy consultation to address the serious concerns expressed by Stagecoach. Such issues remain unresolved and continue to cast significant doubt that Sharpness can be well served by public transport provision.
- 5.19 In the context of Rail, there is no evidence to demonstrate that the proposals for a re-opening of the railway line at Sharpness is feasible or financially viable. It is noted that this current consultation signposts to the material prepared by the promoter of the Sharpness New Settlement. It is not the role of promoters to supplement the preparation of a Local Plan with their promotional material. However, in terms of rail provision the promotion document provides no compelling reason to have confidence that the re-opening of the railway line to passengers can be provided. References to discussions and meetings to discuss this does not provide any confidence that this is a realistic prospect.
- 5.20 Consequently, there is little supporting evidence prepared in support of this version of the Plan to demonstrate that a New Settlement at Sharpness can achieve the critical infrastructure improvements necessary to ensure sustainable patterns of development are achieved.
- 5.21 The 2017 Strategic Assessment of Land Availability (SALA) assessed the site (NEW002) and identified a number of issues arising from the development at this location. This included the sites proximity to the adjoining RAMSAR site; key wildlife site and impact on identified heritage assets. Also, the SALA notes that the site is in multiple ownership.

5.22 Such factors do not appear to have been fully considered in the evidence base and it is noted that the emerging policy states that detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements. This would suggest that there is still a considerable amount of work that is required in order to demonstrate the suitability of this location for a new settlement.

5.23 Whilst it may well be the case that there is flexibility and scope within the identified area to respond appropriately to site specific constraints, such as ecology and heritage considerations, the geographical location of this new settlement and its relationship with the rest of the District and areas beyond raises significant challenges in terms of achieving a sustainable pattern of development well connected to key services and facilities outside of this new settlement location

5.24 Table 6 of the draft plan provides the projected delivery rates and for Sharpness as follows:

Years	Number of Dwellings
2025-2030	500 (100dpa)
2030-2035	750 (150dpa)
2035-2040	1,150 (230dpa)
<b>2025-2040</b>	<b>2,400</b>

5.25 The delivery trajectory for Sharpness is not supported by any evidence to explain why the rates proposed accurately reflect the ability of this site to deliver. Such information is considered essential in terms of justifying the projected rate of delivery.

5.26 It is noted that PS36 states that:

*“A range of tools including a community engagement and stewardship strategy, design codes and a spatial masterplan and implementation plan, to be approved by the District Council, will detail the way in which the new community, land uses and infrastructure will be developed in an integrated and coordinated manner”.*

5.27 It is evident therefore that the proposed delivery trajectory is little more than a best guess, which has no basis on specific evidence and will in fact become redundant as the proposals at Sharpness are developed.

5.28 Delivery rates of 230dpa per year between 2035-2040 lacks any credible justification and represents an overly ambitious build-out rate for this new settlement. The proximity of the Sharpness new settlement to the extant allocation at Sharpness Docks (300 dwellings), as well as the second New Settlement location at Wisloe, located just 4 miles and which is projected to build out 1,500 dwellings within the Plan period, does not appear to have been considered in terms the potential saturation of housing delivering within areas that have similar travel to work patterns.

5.29 Any delay to housing delivery at Sharpness, based on the Plan's trajectory, will result in significant numbers of homes (in the hundreds) not coming forward as currently relied upon.

### **Wisloe**

5.30 We also have significant concerns in respect of the new settlement proposed at Wisloe (PS37), where we consider there to be viability and deliverability issues including that:

- The identified area comprises multiple landownerships and so complex land assembly will be required, thus making the site highly likely to be undeliverable in the 5 year period. The site is also being promoted by these multiple landowners and is not affiliated with a developer. The deliverability of the site therefore has to be questioned.
- The proposal is to deliver a new 'garden village community' at this site for 1,500 new dwellings and 5ha for employment land. We would question whether a development on the Wisloe site would have the critical mass to support anything other than a very basic level of facilities (i.e. a local store, perhaps a take-away and a primary school) making travel out of the immediate environs of the development necessary for most day to day purposes. We therefore question the sustainability of the site as existing services are well over walking distances. The site would operate as an extension to Cam and/or Slimbridge and should be promoted as such. This point is effectively made by the Sustainability Appraisal Report for the Stroud Draft Local Plan which defines the site as being at a Tier 3b settlement (assuming this reference refers to Slimbridge) in respect of criterion SA6 (Services and Facilities). You would not expect a 'new settlement' to already have an existing classification.
- Self-Containment – following on from above, the site has limited opportunity to grow beyond the boundary of the currently identified; owing to the M5 and proximity to surrounding settlements. We would therefore question whether the allocation is sufficient in scale to allow for self-containment and deliver a settlement based on true 'garden village' principles.
- Coalescence – as proposed, the scheme would arguably join Cam with Slimbridge and Gossington, and significantly erode the gap with Cambridge. It would be very difficult to understand how the subject site can be delivered without comprising the unique character of each surrounding settlement/hamlet. This would have an unacceptable cumulative urbanising effect and the separate identity of each of the villages would be lost. It is also noted that the Landscape Sensitivity Assessment undertaken by Stroud DC in 2017 excluded Wisloe from the assessment. The site should therefore be formally assessed as part of the Council's background evidence as it is likely that the assessment would conclude that the coalescence of the existing individual villages would be highly inappropriate and damaging in wider visual appearance and landscape terms.

- Viability – It is not clear whether a viability assessment of the site has been undertaken ‘new settlements/garden villages’ often require significant abnormal costs for servicing therefore it would be helpful to understand whether the site can deliver policy compliant affordable housing etc.
- Ecology – it is noted that an ecological appraisal has been undertaken which recommends that further surveys are undertaken in respect of a number of protected species including bats, badger, dormouse, water voles, otters, birds, reptiles, amphibians (including GCN) and invertebrates. Should any protected species be found to be present, this could lead to areas of the site requiring specific mitigation that has yet to be factored into the proposals. The true capacity of the site for development therefore remains unknown.
- Landscape – as previously stated, the site has not been assessed as part of the Council’s Landscape Sensitivity Assessment and should have been given that it only lies 3.8km to the east of the Cotswolds Area of Outstanding Natural Beauty (AONB). The potential impact of the new settlement on the setting of the AONB should therefore be thoroughly examined as it is considered that the development is likely to introduce an inappropriate urbanising development into the area.
- Noise – the site is located between the railways and the M5 to the east and the A38 to the west. The site, by virtue of its location will be inherently noisy and will require the inclusion of appropriate mitigation measures, including possible landscaping, acoustic bunds or the introduction of large building blocks around the site perimeter to ensure noise levels within external amenity areas are within acceptable levels. Again, it doesn’t appear that any such mitigation has been included within the design of the scheme at this current time and therefore the true capacity of the site for development or the impact of any such mitigation therefore remains unknown.

## 6. CONCLUSION AND CHANGES SOUGHT

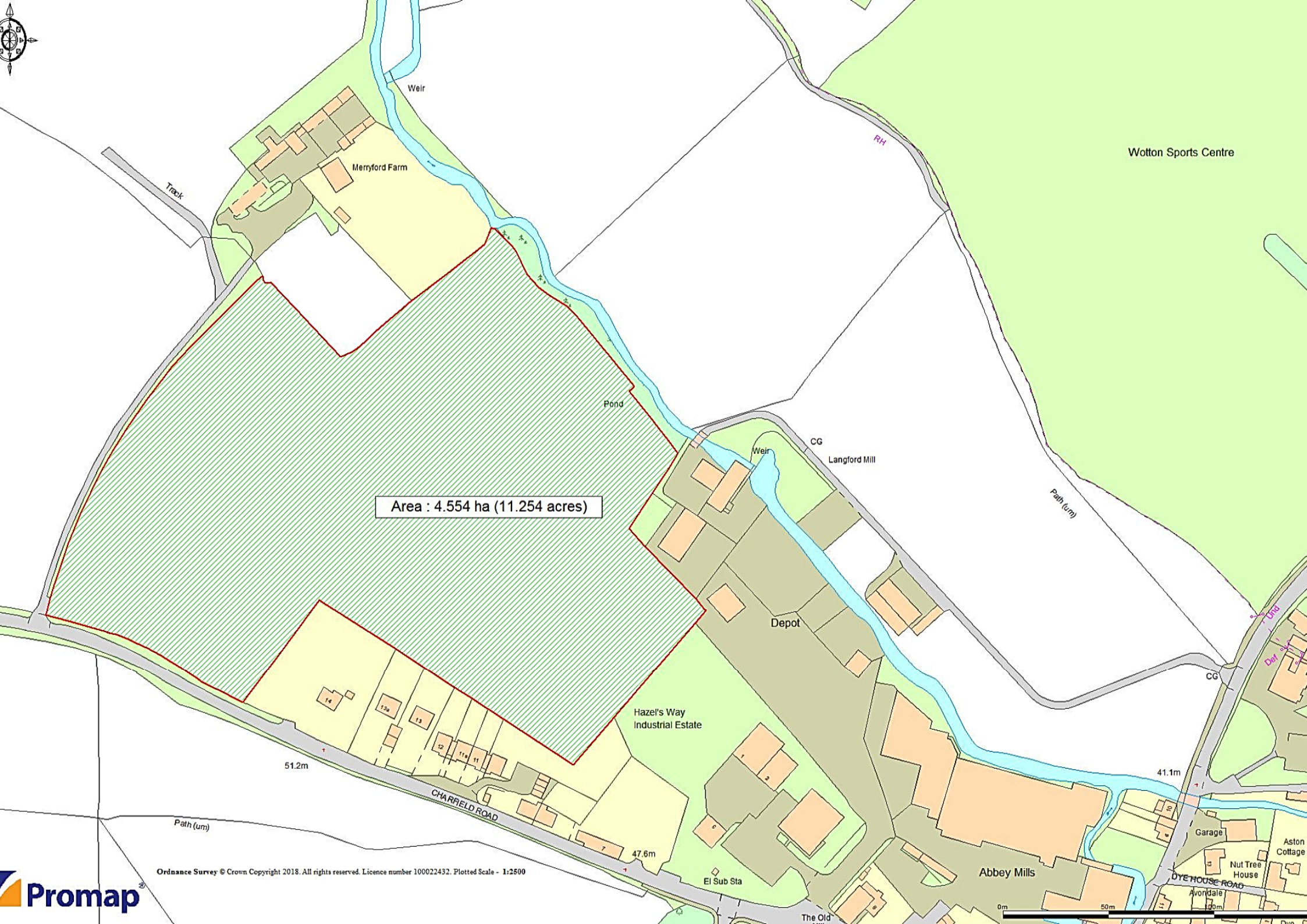
- 6.1 The Development Strategy as currently proposed does not provide a robust, sound or deliverable strategy upon which the future growth requirements of the District can be delivered.
- 6.2 The approach of the Plan is to supplement traditional strategic allocations, with two New Settlements (Sharpness – PS36 and Winsloe – PS36), providing 3,900 homes up to 2040. This represents more than half (51%) of the housing identified as allocated sites in the District top tier settlements. It is therefore essential that there is a compelling justification to support their claimed delivery as an integral component of the Development Strategy.
- 6.3 In general terms the objective of the Development Strategy is to support the development of inclusive, diverse communities, with housing and employment in close proximity and good access to wider services and facilities, to reduce the carbon footprint and to improve the District's sustainability and self-containment (paragraph 2.12 of draft Plan). This objective is not restricted or limited to specific locations or settlements, it is a universal basis of the Plan and applies to all settlements within the District.
- 6.4 However, owing to the inclusion of New Settlements, it is our view that this approach subverts the objectives of the development strategy and potentially curtails the ability of lower tier settlements to grow and thrive.
- 6.5 Our representations set out above articulate why the proposed New Settlement at Sharpness does not provide a sound component of the Development Strategy. Serious concerns relate to the ability of this remote location to be delivered in a sustainable manner. The plan, in its current form lacks any evidence to justify its inclusion within the Plan. Significant work remains to be done to provide the necessary confidence that the Sharpness New Settlement represents a logical, deliverable and integrated component of the Development Strategy.
- 6.6 Even if it were the case that the Sharpness New Settlement is retained, the delivery profile lacks any meaningful justification. Any delay to this contrived delivery trajectory, will result in significant numbers of homes (in the hundreds) not being delivered.
- 6.7 Consistent with the above, we have also set out our very significant concerns as to the appropriateness and deliverability of the proposed new settlement at Winsloe.
- 6.8 To achieve the step-change in housing required to meet the current LHN figure, the development strategy should seek to facilitate development at sustainable locations, where such proposals provide a deliverable development opportunity and support the role and function of their host settlement.
- 6.9 Wider opportunities exist at lower tier settlements to make an important contribution to the District's housing needs, whilst also providing solutions to existing infrastructure deficiencies. In this regard we submit within these representations further information regarding land controlled by Redrow Homes Ltd north of Charfield Road, Kingswood.



- 6.10 The Charfield Road site provides an opportunity to address the acknowledged severe issues with primary school education at Kingswood. Whilst subject to further discussions, it offers the potential to provide a new site for a 2 form entry primary school based on circa 100 dwellings or to deliver a new school based on circa 300 dwellings (please see Appendix 2).
- 6.11 We are aware that the Parish Council has been unsuccessful in its efforts to-date to identify land for a new primary school and it is our understanding that those promoting other development sites within Kingswood are unable to provide for a new primary school. As such, the Redrow proposal offers a unique opportunity to deliver genuine benefits to the community.
- 6.12 Kingswood is classified as a Tier 3a settlement and therefore is only expected to accommodate 50 dwellings within the Plan period. As explained within these representations, the Settlement Role and Function Study (2014, 2018 Update) demonstrates that Kingswood performs very well against the assessment criteria, and out performs a number of higher tier settlements.
- 6.13 Our representations also highlight flaws in the 2014 and 2018 Update, specifically in terms of 'strategic infrastructure' provision, namely Secondary School and Sports Recreation. It is our view that the inclusion of these within the identified available services and facilities, alongside the recognised strong employment function of Kingswood, would elevate this settlement such that it would perform the function of a Tier 2 settlement.
- 6.14 Furthermore, given the proximity of Kingswood to Wotton-under-Edge which is one of the District's main towns and which is itself highly constrained, the opportunity exist for Kingswood to contribute meaningfully to wider housing needs.
- 6.15 Ultimately the decision to classify Kingswood as a Tier 3a settlement, does not in our view, accurately reflect the sustainability credentials of this settlement. We therefore request that Kingswood is identified as a Tie 2 Settlement.
- 6.16 The single allocation at Kingswood (PS38 – 50 dwellings) does not, and cannot in our view, resolve the current issues related to primary school capacity at Kingswood Primary. Therefore, given that the draft plan only allocates this site "*subject to the satisfactory resolution of school capacity at Kingswood*", it is difficult to envisage any rationale for its inclusion as a proposed allocation.
- 6.17 The reality is that PS38 will compound the issues at Kingswood Primary school and simply require new residents to drive to alternative education provision outside of Kingswood, contrary to the wider objectives of the Plan and inconsistent with sound plan-making.
- 6.18 Land controlled by Redrow Homes at Kingswood provides a genuine development opportunity to respond to specific issues at this settlement, whilst delivering a scale of development that is commensurate with the true role and function of Kingswood and its capacity to accommodate growth.

- 6.19 There is clear direction in national policy to support the role and function of rural areas and as demonstrated in the Council's own evidence bases, Kingswood is a high performing settlement that should, in our view, represent a genuine and suitable location for meaningful development.
- 6.20 Wider issues expressed within these representations, including significant concerns regarding the reliance on the New Settlement at Sharpness and the apparent strategy to artificially constrain development at lower tier settlements, represent significant failings of the Plan in its current form.
- 6.21 Land promoted by Redrow Homes at Kingswood provides a genuine and positive response to this issues and is therefore suitable as an allocation within the Plan.

## **APPENDIX ONE – SITE LOCATION**



Area : 4.554 ha (11.254 acres)

## **APPENDIX TWO – SITE PROMOTION DOCUMENT**

Site Promotion Document

# Charfield Road, Kingswood

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Redrow Homes | January 2020



**above:** Redrow Homes development - 'A Better Way to Live.'

# 1. Introduction

This Site Promotion Document sets out a preliminary site analysis and a conceptual proposal for a sensitive residential development at land north of Charfield Road, Kingswood.

## 1.1 Summary

**1.1.1** This document has been produced to inform discussions with local stakeholders regarding the opportunity for development at Charfield Road, Kingswood. It sets the background context for the proposals and shows why the site is suitable for residential development and potentially a primary school.

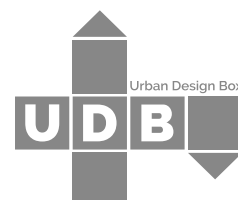
**1.1.2** The site sits on the north west edge of Kingswood with the Renishaw employment site sitting to the north west of the site. The site comprises two parcels of land, either side of an existing private access road to Merryford Farm, which are currently used as agricultural fields.

**1.1.3** These initial proposals illustrated within this document have been developed with input from a number of technical consultants; preliminary technical evaluations and assessments have been undertaken for the site. This document sets out headlines of all these environmental and technical findings relating to the site and demonstrates the suitability of the site for development.

**1.1.4** The document reviews the local context of Kingswood as a sustainable location for development and seeks to demonstrate how the development of this site can help deliver growth in a sustainable manner.

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## 2. Redrow Homes - A Better Way to Live

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Redrow Homes is involved in numerous projects throughout the UK and aims to work with local communities to help deliver high quality developments that meet housing need and provide appropriate community infrastructure.

### 2.1 Homes by Design

**2.1.1** We're dedicated to designing and building homes with character that people are proud to live in. Inspired by the past but designed for the future, the Heritage Collection offers the best of both worlds.

**2.1.2** Redrow's Heritage Collection has been inspired by the 1930's Arts and Crafts era, brought up to date with designs to suit 21st century life. While the exteriors celebrate the very best of this classic style, most prevalent in the still much-admired character properties of the 1930s, the interiors boast modern features and a high specification to suit the way we live today.

### 2.2 Redrow 8 – Designing a better way to live

**2.2.1** At Redrow we are committed to delivering thriving communities and creating better places to live. As part of this commitment we have developed the 'Redrow 8' – a set of placemaking principles for all of our developments.

**“At Redrow, we build more than just homes; we create thriving communities. We provide what modern homebuyers want from their homes, neighbourhood and local environment.”**





“Redrow creates a better place to live by putting customers’ expectations at the heart of our home designs.”

 **BUILDING RESPONSIBLY**

 **VALUING PEOPLE**

 **THRIVING COMMUNITIES**



## 3. Site Context

### 3.1 The site within Kingswood

**3.1.1** Kingswood is located 2km to the south of Wotton-Under-Edge and 3.2km to the east of Charfield. The M5 motorway, via Junction 14, is located 6.5km to the west.

**3.1.2** The 60, 63, 84, 85, 626, 860 and S8 bus routes run and stop along Charfield Road. These buses provide regular services to Thornbury, Wotton-Under-Edge, Charfield, Yate and Wickwar. The 85 bus provides a connection to the train station at Yate in 45minutes.

**3.1.3** The closest primary school to the site is Kingswood Primary School which is approximately 0.8km to the east. Katharine Lady Berkeley's Secondary School is a highly successful 11-18 mixed comprehensive and is located approximately 0.6km east of the site.

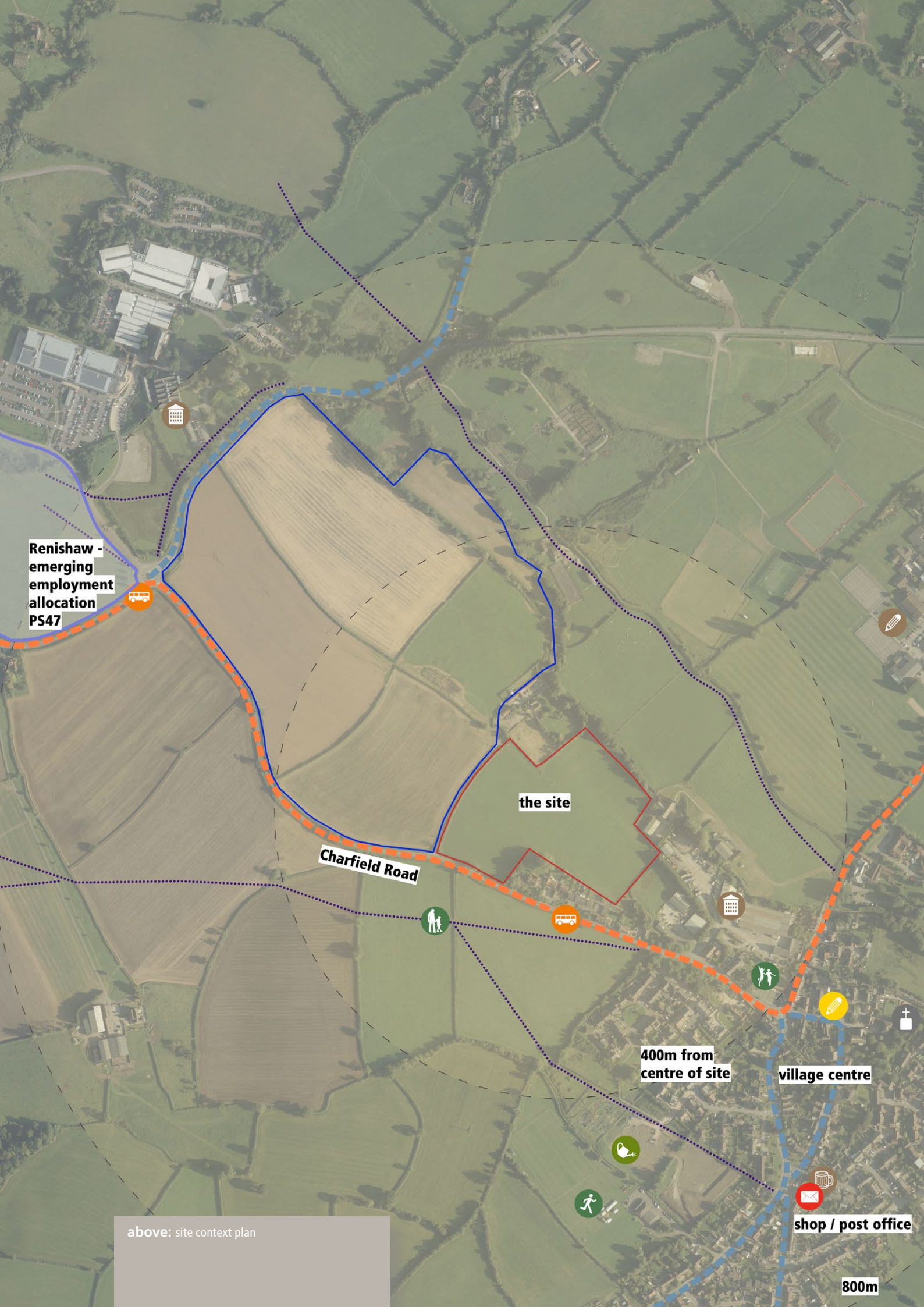
**3.1.4** Kingswood has a village hall, a church, shops and a post office as well as a public house along Wickwar Road. There are two employment sites near the site: Renishaw immediately to the north-west; and The Abbey Business Park immediately to the south east.

**3.1.5** Langford Mill, a Grade II listed building, lies beyond the eastern boundary of the site; its context and setting should be considered in the development of the masterplan for the proposals. The site lies to the south (and outside) of the Cotswolds AONB.

**3.1.6** The Stroud District Local Plan Review Draft Plan for Consultation (November 2019) proposes a further allocation for employment (PS47) north west of the site adjacent to the existing Renishaw site. The allocation would sit adjacent to the site and would provide a significant employment opportunity within walking distance of the site.

#### Local facilities

-  employment areas
-  place of worship
-  secondary education
-  primary education
-  village centre shop / post office
-  public house
-  local walking paths
-  allotments
-  sports pitches
-  sports facilities
-  walking distances from centre of site
-  Development boundary
-  Adjacent road network - principal routes
-  Nearby bus route
-  Emerging employment allocation PS47



Renishaw -  
emerging  
employment  
allocation  
PS47

the site

Charfield Road

400m from  
centre of site

village centre

shop / post office

above: site context plan

800m

## 4. Background Technical Information

A full consultant team has been appointed to carry out initial technical and environmental surveys and reports which have informed the initial concept proposals for the site.

### 4.1 Transport

#### Proposed Vehicular Access

4.1.1 It is proposed that a vehicular access to the site would be provided by way of a priority 'give-way' junction taken from Charfield Road. This junction would be located approximately 60m to the east of the existing access lane leading to Merryford Farm.

4.1.2 The site access carriageway would likely take the form of a 5.5m carriageway, joining to Charfield Road with radii of 6.0m. A visibility splay of 2.4m x 160m would be provided and maintained to the west while a splay of 2.4 x 59m would be provided and maintained to the east from the proposed junction.

4.1.3 The proposed junction would provide access to both proposed development parcels, including the school. For the third development option presented within this document, there is potential to create a new cycle link from Renishaw, to the north of the site, through the development and past the proposed primary school and then connecting towards the centre of the village to the south. There is potential to integrate any future potential strategic cycle routes using the site as an off road section of the route.

#### Internal Road Layout

4.1.4 The internal road network will be designed in line with the guidance provided in Manual for Streets and incorporate a new pedestrian route to the village via land to the south of the development. This pedestrian connection would promote walking and cycling through the creation of safe routes throughout the site.

4.1.5 The internal road layout would be designed to cater for the anticipated volume and type of trips on each link, as well as the number of dwellings accessed. Thus, it is likely that the internal road network for both parcels would be restricted to 20mph.

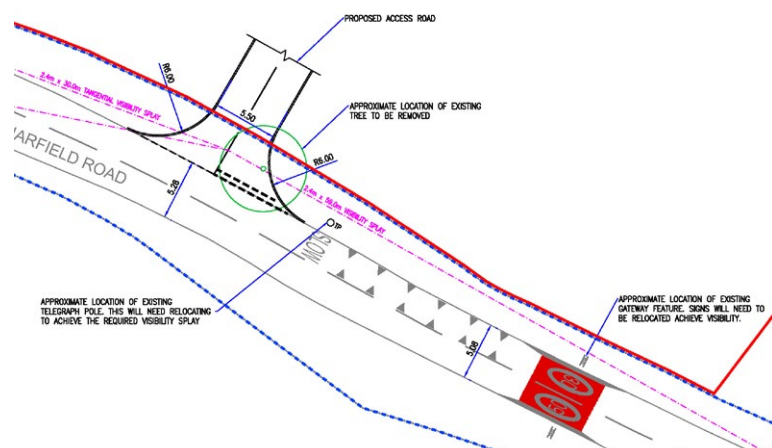
4.1.6 A high quality movement network which prioritises non-car users will contribute to the overall sustainability of the proposals.

#### Site Accessibility

4.1.7 The site is well-located to access the existing facilities and services in Kingswood, whilst a wider range of offerings lie within cycling distance. The site is located within walking distance of bus stops, which enjoy provision with regular services to Wotton-Under-Edge, Charfield and Yate, where there is a train station.

#### Development Trip Generation

4.1.8 Based on the preliminary assessment of the anticipated trip generation of the sites, it is reasonable to conclude that the development proposals will result in a low level of traffic generation, which is unlikely to have a material impact on the local highway network.



## 4.2 Flood Risk, Drainage and Utilities

**4.2.1** A narrow corridor of fluvial and surface water flood risk (zone 2 and 3) has been identified along the two existing water courses shown on the constraints plan, located to the north and west of the site. The development proposals should take into account the existing flood zones, with no proposed residential dwellings located within areas of flood risk. No flood risk issues have been identified for the proposed site that would prevent development from coming forward.

**4.2.2** Sustainable drainage features could be utilised to attenuate surface water from the proposed development, with infiltration methods the preferred option. It is proposed that flows from the development will be attenuated on site and discharged at a restricted pre-development rate.

## 4.3 Utilities

**4.3.1** All necessary utilities are available at the site. It is proposed that the development will form connections to the existing apparatus within close proximity to the site to provide services.

**4.3.2** Due to the small scale of the development, it is anticipated that the existing infrastructure will be capable of supplying the proposed development, subject to agreement with the appropriate utilities companies.

**4.3.3** Based on the current information available, it is considered that the development proposals, in combination with the consideration of appropriate mitigation measures, would not give rise to any major adverse effects to the proposed site or the surrounding area.



**left:** Proposed access design with visibility splays (Paul Basham Associates) and

**above:** site boundary with the B4058 looking towards Kingswood, showing Charfield Road to the right

## 4.4 Landscape

### Landscape Character Context

4.4.1 This greenfield site comprises an irregular shaped pocket of arable land. Boundaries of the site are vegetated on all sides.

4.4.2 Agricultural land and Merryford Farm border the site to the north, west and north-west. The edge of Kingswood adjoins the southern and eastern boundaries. A row of modern/post-industrial residential development overlooks the southern edge of the site. Abbey's Mills Industrial Estate is adjacent to the north-eastern edge of the site. The northern boundary has mature broad-leaf trees demarcating a waterway along the site's edge. On the north-east corner of the site, a listed building converted to residential borders the site's edge.

4.4.3 The land form of the site is gently sloping towards the AONB. The highest elevations on site reach c.49m above Ordnance Datum (AOD) and these levels are found closest to the existing houses on the southern boundary. The landform on site falls away to the north to lows of c.38 aOD.

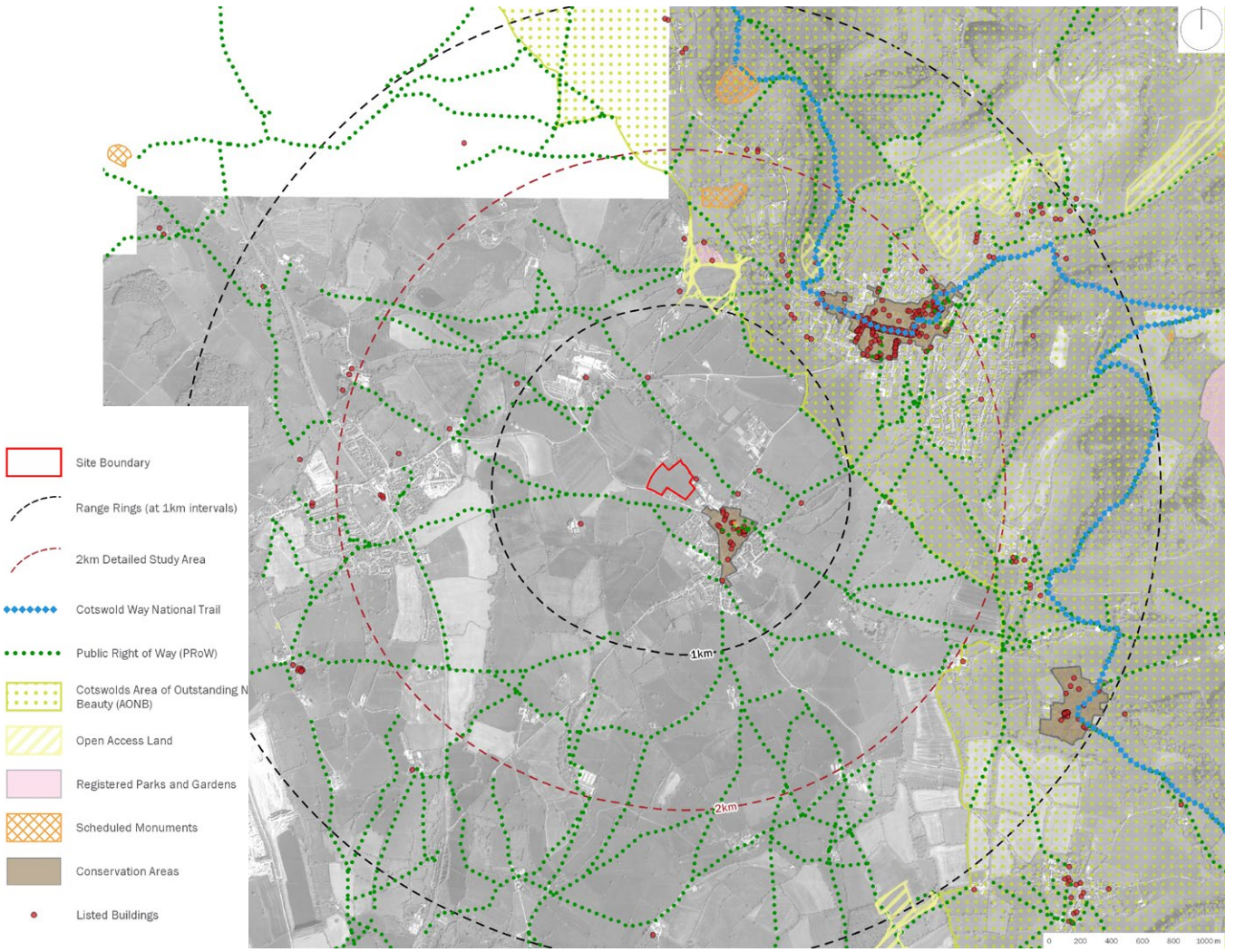
4.4.4 The character of the site is rural, and the sense of tranquillity is considered moderate; however, the settled context to the south and south-east reduces the sense of rural isolation and remoteness.

### Visual Context

4.4.5 As the landscape of the site is open and the landform falls away to the north, views to the north and north-east towards escarpments in the Cotswolds AONB are available from within the site.

4.4.6 The site's location on the western edge of the settlement, adjacent to a mixed development edge which is modern for the most part, means that the site has the potential to integrate with the existing settlement when seen in wider views.





above right: Landscape related designations and Zone of Theoretical Visibility (EDP)

left: Private lane accessing Merryford Farm





**Viewpoint 1:**

View south from Wotton Hill and Cotswolds Way National Trail, taken from within the AONB.

**Viewpoint 2:**

View from William Tyndale Monument and the Cotswolds Way National Trail within the AONB, approximately 3.1km to the north-west of the site.



4.4.7 There are close range views of the site from PRoW to the north and south. Properties on the southern boundary have direct and mostly uninterrupted views of the site. The site is visible for about 150m from Charfield Road on approach to Kingswood from the north-west. Travelling in the opposite direction however, views of the site are more difficult to discern due to the existing built form on the site's edge, although filtered and fleeting views in between the properties on the southern edge are available.

4.4.8 As well as close range views, there are medium and long-distance views of the site from the north and north-east. Views from within the AONB are available. In these views the site is seen sloping towards the river, with the distinctive row of houses beyond the site in these views.

4.4.9 As part of the masterplanning for the site, long distance views of the development will be mitigated by tree belt planting and a landscape led masterplan approach.

4.4.10 From a landscape and visual perspective residential development could be accommodated within the site if consideration is given to the following Landscape recommendations.

### Landscape Recommendations

4.4.11 In response to the desktop and fieldwork undertaken, the following conclusions and recommendations have been identified below.

- The layout of the site should seek to work with and reflect the site topography and site context. The site drains naturally to the northern edge and therefore this is a suitable location for sustainable attenuation features.
- A generous landscape strategy is necessary to mitigate any adverse effects on users of the PRoW and the visual amenity of recreational users of the Cotswolds AONB.
- The layout should be varied and ample space should ideally run east to west, with tree planting in between to break up the mass of the proposals.
- Designed views should be carefully considered to create views out of the proposed development, whilst reducing the views into the site. Proposed dwellings on the lower parts of the site should be low density to create a feathered edge, with views towards the AONB.
- Retain existing field boundaries and develop a long-term management plan.
- Maintain the discreet approach to Kingswood from the north-west using buffer planting and development well set back from the site's edges.



**Above:** View from public footpath looking south-west towards the site (EDP)

## 4.5 Ecology and Arboriculture

4.5.1 Preliminary survey work has not identified any major ecological constraints to development of the site and it is considered that the habitats of ecological value can be readily accommodated into a sensitively designed scheme. There remains ample opportunity for mitigation, compensation and enhancement measures through careful design, following the guidance below:

- No major constraints regarding loss of grassland, however biodiversity net gain required across the site.
- Ideally retained ditches buffered with 3m strip to protect from pollution and allow maintenance access.
- Retain and protect hedgerows. Replace any losses and provide 'net gain' in total hedgerow length.
- Design to include bat, bird and bug boxes to enhance site for wildlife.
- A 15m buffer is recommended from the stream to protect riparian vegetation, otter and water vole. Keep corridor dark and protect from pollution/excess water using SUDS.

## 4.6 Archaeology and Heritage

4.6.1 The site does not include any 'designated heritage assets', as defined in Annex 2 of the National Planning Policy Framework (NPPF), which would thus represent an 'in principle' constraint to development because of a presumption in favour of their physical retention.

4.6.2 Langford Mill, a Grade II listed building is present in close proximity to the north-east. Other listed buildings are present in the vicinity and have been noted in the site context plan.

4.6.3 Whilst those designated heritage assets in the wider landscape will require full consideration in due course, there is currently no reason to believe that any of them form a substantial constraint (if any) to site deliverability or site capacity.

**Photo EDP 4:** View from a public path looking south-west towards the site. The field in the middle ground contains the site and a listed building on the site's leading edge is seen in the centre of the view. Dwellings on Charfield road (bordering the site) are seen in the near background.

























**Above:** Looking towards the water course from Charfield Road.

## 5. Site Features Plan

The adjacent plan provides a summary of the site's constraints, and opportunities drawn from the preceding technical work and plans. This sets a brief for the development of the following concept masterplans.

-  Development boundary
-  Potential all modes access
-  Potential pedestrian access
-  Potential connection to wider land
-  Existing pedestrian route
-  Adjacent road network - principal routes
-  Existing adjacent farm track
-  Potential new pedestrian link (alignment tbc)
-  Nearby bus route
-  Flood Zone (EA flood map for Planning)
-  Potential location for attenuation feature
-  Existing watercourse
-  Existing hedges
-  Existing trees / planting
-  Direction of downwards slope
-  Boundary to rear gardens
-  Adjacent buildings
-  Nearby key facilities
-  Nearby listed buildings
-  Emerging employment allocation PS47



Above: Site Features Plan.



## 6. Development Concept Options

Three development options are presented which offer a strategy for delivery of either residential development, residential plus land for a primary school or great residential development plus the delivery of a primary school.

### 6.1 Development Strategy - Option 1 - 100 homes

#### CONTEXT - Development envelope:

- Existing green edge to stream corridor will be used for SUDS, informal recreation and biodiversity improvements.
- Setting to existing farm to be protected.

#### BUILT FORM AND IDENTITY - urban form:

- Approximately 100 dwellings (30d/ha)
- Active frontages will be created onto the main street, stream corridor and areas of open space.
- Focal and corner buildings will help frame and punctuate the development, affording character and identify.

#### NATURE - landscape framework:

- Retention of most existing hedges and mature trees. The existing and proposed hedges also provide for biodiversity corridors across the development as well as informal play opportunities.
- Areas of open space can be used for biodiversity net improvements.

#### MOVEMENT - movement framework:

- The site will be access from Charfield Road;
- The option of a further separate pedestrian access further east towards the village centre to create a safe walking route to the development is available;
- Areas of improved public realm will be placed at key locations along the street to provide the development with focal points, slow down traffic speeds and facilitate pedestrian movement.

#### Key:



site access road



pedestrian route



residential development



opportunity for focal building



existing / proposed planting



access route required

Charfield Road

- 01 pos
- 02
- 03
- 04
- 05
- 06
- 07
- 08
- 09
- 10

residential development

residential development

pedestrian egress onto Charfield Road to connect to existing footway - exact location to be confirmed

Above: Development Concept Option.



## 6.2 Development Strategy: Option 2 - 100 homes plus land for a Primary School

### CONTEXT - Development envelope:

- Existing green edge to stream corridor will be used for SUDS, informal recreation and biodiversity improvements.
- Setting to existing farm to be protected.

### BUILT FORM AND IDENTITY - urban form:

- Around 100 homes (30 dwellings/ha)
- Site provided for a 2-Form Entry Primary School
- Active frontages will be created onto the main street, stream corridor and areas of open space.
- Focal and corner buildings will help frame and punctuate the development, affording character and identify.

### NATURE - landscape framework:

- Retention of most existing hedges and mature trees.  
The existing and proposed hedges also provide for biodiversity corridors across the development as well as informal play opportunities.
- Areas of open space can be used for biodiversity net improvements.

### MOVEMENT - movement framework:

- The site will be access from Charfield Road which serves residential development and the school;
- The option of a further separate pedestrian access further east towards the village centre to create a safe walking route to the development is available;
- Areas of improved public realm will be placed at key locations along the street to provide the development with focal points, slow down traffic speeds and facilitate pedestrian movement.

#### Key:



site access road



pedestrian route



residential development



opportunity for focal building



existing / proposed  
planting



potential school building



land with potential for additional residential development

residential development

POS

access lane remaining

residential development

Charfield Road

School playing fields

School access and drop off

School building

pedestrian egress onto Charfield Road to connect to existing footway - exact location to be confirmed

Above: Development Concept Option.

### 6.3 Development Strategy: 300 homes plus delivery of a Primary School

#### CONTEXT - Development envelope:

- Proposed development envelope and strategic placement of streets and mews retains key views to the AONB (Wotton Hill and Westridge Woods), open views down and across Charfield Road and the employment centre's amenity.
- Existing green edge to stream corridor will be used for SUDS, informal recreation and biodiversity improvements.
- Setting to existing farm to be protected.

#### BUILT FORM AND IDENTITY - urban form:

- Centrally placed and well-connected school balances the proposed development and helps to integrate them better with the existing village.
- A two-step approach to densities (30d/ha closer to existing village and 20d/ha towards the employment centre) will help the development relate with the surrounding landscape, respecting existing amenity, openness and key views.
- Active frontages will be created onto the main street, stream corridor and areas of open space;
- Focal and corner buildings will help frame and punctuate the development, affording character and identify.

#### NATURE - landscape framework:

- Retention of most existing hedges and mature trees provide for biodiversity corridors across the development as well as informal play opportunities.
- Strategically placed new hedges and area of open space visually break up the development at its highest point and help to integrate it into the surrounding countryside.
- Proposed trees on the area of open space adjacent to the employment centre will help to create an informal green edge to the development as well as framed views from the employment

centre and adjoining road/roundabout.

- A pocket park has been placed centrally to serve all residents and will include for informal play opportunities as well as a meeting and socialising place for the residents.

#### MOVEMENT - movement framework:

- The site will be access from Charfield Road which serves residential development and the school;
- The option of a further separate pedestrian access further east towards the village centre to create a safe walking route to the development is available;
- The exiting SUStans cycle route will be extended into the site and beyond, connecting the village to the proposed school and employment centre, providing a safe and attractive cycling route for all.

#### Key:



site access road



pedestrian route



residential development



opportunity for focal building



existing / proposed planting



potential school building



potential to integrate cycle route

POS

landscape edge to development  
POS

residential development

existing trees retained

School playing fields

School building

School access and drop off

Charfield Road

access lane (proposed)

residential development

pedestrian egress onto Charfield Road to connect to existing footway - exact location to be confirmed

Above: Development Concept Option.

## 6. Conclusion

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There is the opportunity for development of between 100 and 300 homes as well as options for delivery of a new two-form entry primary school on the site north of Charfield Road.

**6.3.1** The site could provide a variety of sizes of new homes, including affordable homes. Development of the site could also include a new primary school linked via a new cycle path to Kingswood and the employment centre.

**6.3.3** The development concepts shows a well connected and high quality place which respects and enhances the existing landscape and visual character as well as ecological features.

**6.3.2** The development will create a new public open spaces which would be accessible to both new and existing residents.



above: The site within Kingswood

## 7. Key Benefits

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The site will provide a number of key benefits to Kingswood and Stroud District as a whole:



Mix of family homes, including affordable properties, thus increasing opportunities for home ownership in the local area



Potential for a new two form entry primary school to benefit existing and new residents



Access to open space for leisure and recreation, including children's play space and natural green space



New footpath created to link the development to Kingswood



Increased use of existing bus routes as a result of new residents travelling in the area



Potential cycle route within the site to connect Kingswood to the proposed school and existing employment area



Good links to the facilities in Kingswood and surrounding areas



The team are committed to the provision of high standard of design and construction enabling an enhanced residential amenity



Section 106 agreement and CIL opportunities to benefit Kingswood and Stroud District



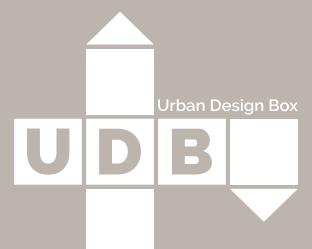
The protection and enhancement of existing landscape features and biodiversity habitats



Increased spending in the locality as a result of new residents coming to the area

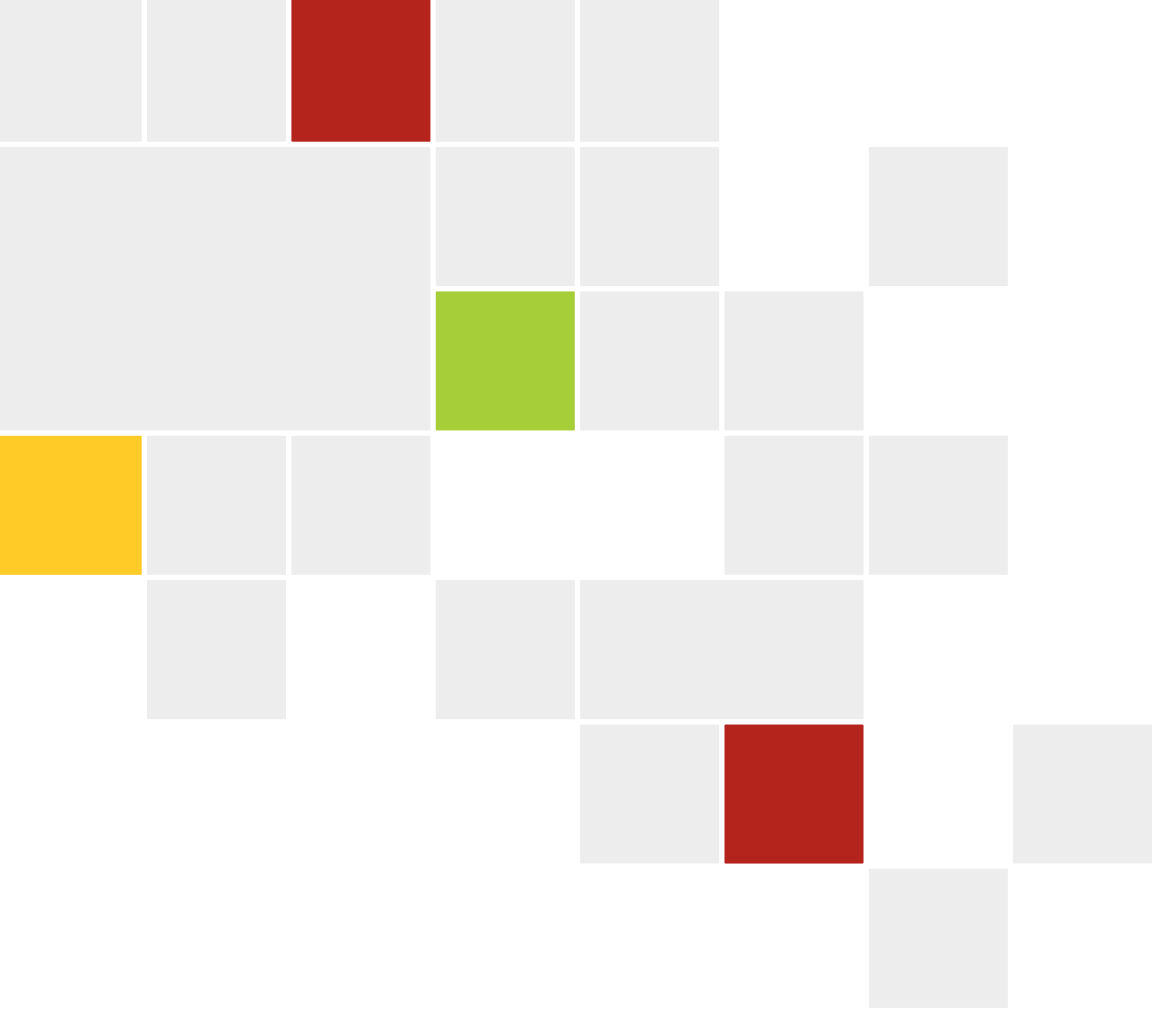


Employment opportunities including full time and supply chain jobs during the construction period









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