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From: [Redacted]
Sent: 05 December 2017 18:30
To: _WEB_Local Plan
Subject: SDC Local Plan Review
Attachments: Option Paper Questions.docx; Option Paper Questions.pdf

Please find attached a Word and .pdf version of my response to your request for views on your paper titled 'Stroud District - Local Plan Review - Issues and Options Paper - October 2017'. I would appreciate being kept informed of all future progress on the review. Many thanks.

Regards

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Response to the SDC Local Plan Review Issues and Options Paper October 2017

1 Below is my response to request for comments on your document titled 'Stroud District - Local Plan Review - Issues and Options Paper - October 2017'.

1.1 I have broken my response into three parts

- Part 1 – concentrates on the current Local Plan Strategy for Hardwicke Parish and how it could be developed into the review
- Part 2 – comments and observations on the list of key issues identified in the document
- Part 3 – my responses to the questions asked in the document

Part 1

The current SDC Local Plan

2 The current Local Plan strategy for Hardwicke includes

- Vision to 2031: Growing a sustainable community at Hunts Grove and preserving Gloucester's rural hinterland
- Para 2.43 - Within Stroud District, employment sites are mainly concentrated at a few key locations including Hardwicke, Stroud town centre, Stonehouse, the Stroud Valleys area, and to a lesser degree within Cam/Dursley and near Wotton-Under-Edge (where the Renishaw HQ is located).
- Core Policy CP3 - A settlement hierarchy for growth and development across the District's settlements
 - ◆ Hunts Grove is a Second Tier settlements - Accessible Local Service Centres
 - ◆ Hardwicke is a Third Tier settlements - Accessible Settlements with Limited Facilities
- Local Plan - Where do we want to be
 - ◆ Parishes of the Gloucester fringe will retain their distinctiveness and rural character
 - ◆ At the urban fringe, particularly Hardwicke, Hunts Grove and Upton St Leonards, the motorway will represent a distinct and defensible limit to southerly expansion.
 - ◆ Hardwicke's village character and sense of community will be preserved, while the area to its east sees continued housing and employment growth,

- ♦ Hunts Grove will grow into a sustainable new community with a strong sense of identity, served by its own “village centre” and providing easy and convenient access to nearby jobs.
 - ♦ Growth and development will be minimal outside of this ‘strategic location’.
- How are we going to get there
- 3.49 – Guiding principles
 - 4. Conserve and enhance the landscape and built character of the urban/rural fringe to provide a strong and high quality edge to the City of Gloucester. Development at Hunts Grove to be physically contained and limited by A38 / M5 and the geographical and functional distinctness of Hardwicke village and Hunts Grove will be maintained

The current Hardwicke Neighbourhood Development Plan (HNDP)

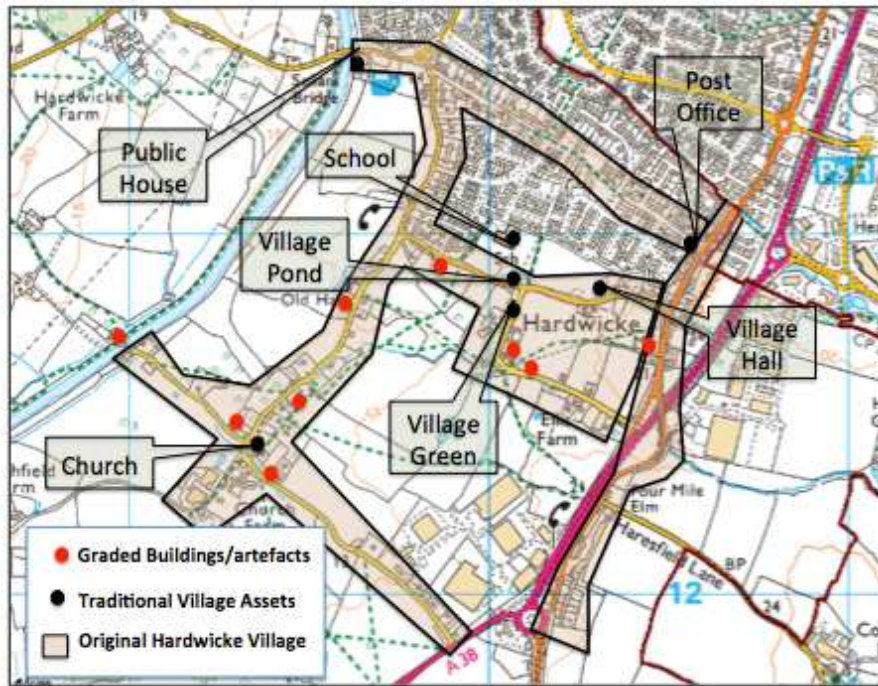
3 The HNDP was made in October 2017. Its content and policies were compiled to reinforce and complement the role of Hardwicke in the SDC Local Plan Strategy through to 2031.

3.1 The Hardwicke NDP Vision is

- Our vision is for Hardwicke to retain its diverse identity, which comprises rural and urban fringe characteristics.
- The housing, employment, services and facilities needs of the community during the Plan period will be met through the development of the Hunts Grove Local Service Centre in the eastern area of the Parish. The traditional areas of Hardwicke will retain their rural identity through the preservation of the valued landscape and historic character.

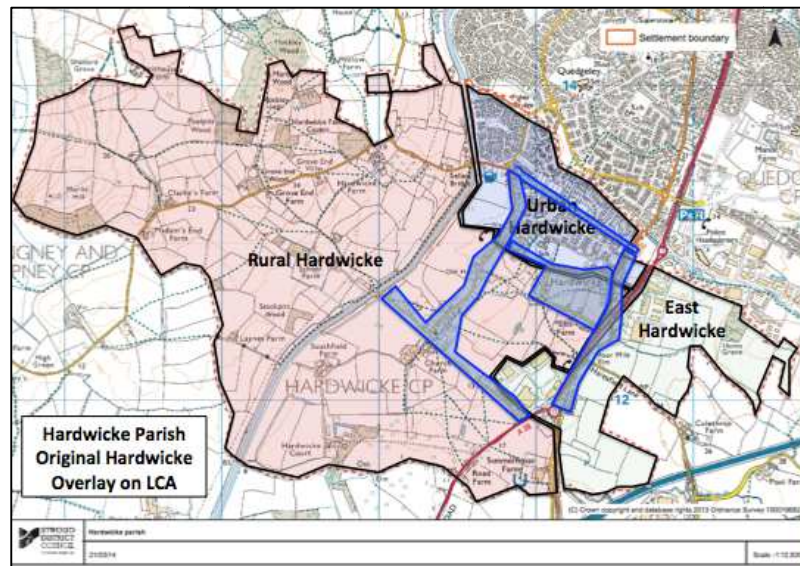
Key Strategic Issues for Hardwicke

4 Since the 12th Century Hardwicke developed along important historical routes between Bristol and Gloucester. Unlike many traditional English villages Hardwicke has become a linear village with its traditional village features such as the church, village green, local pub, village pond and local Post office dispersed along these routes interspersed with its grade 1 and grade 2 listed buildings. This dispersed form makes the character of the village more vulnerable and susceptible to changes in its settings. These features and routes form the area known as ‘Original Hardwicke’ in the HNDP Landscape Character Assessment.



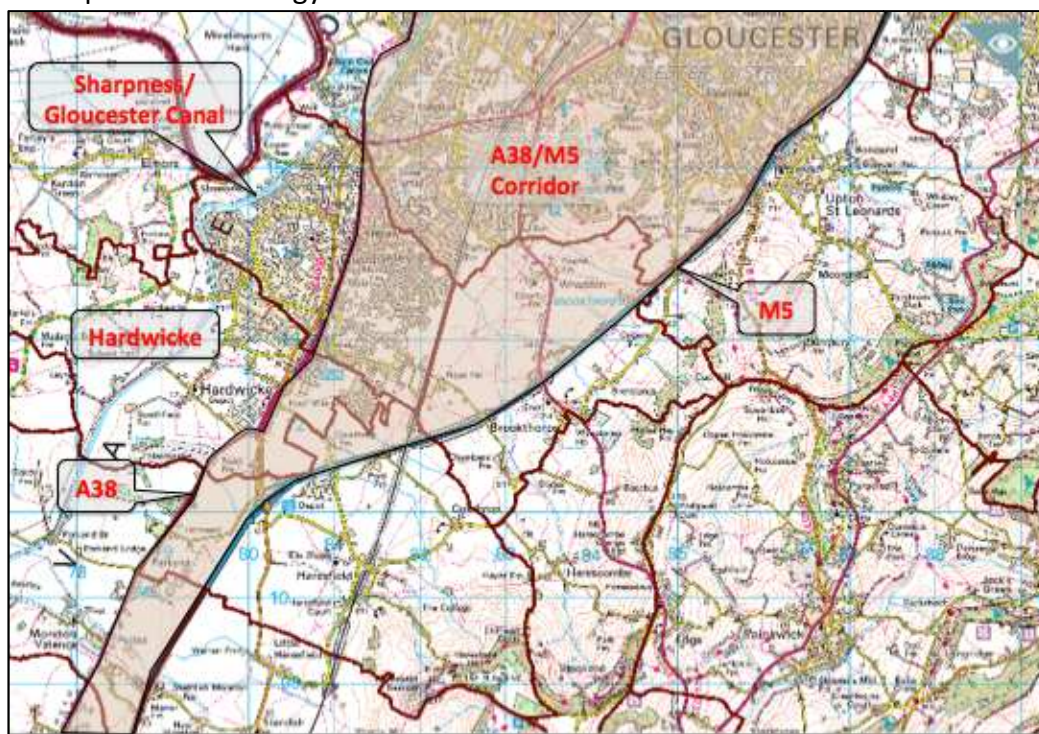
- 5 The Sharpness-Gloucester canal runs through the Hardwicke Parish and is considered an important asset to the Hardwicke community. Future aspirations are to maximise its recreational value to the community in consultation with the canal trust therefore its setting is also of importance to the Parish.
- 6 The previous SDC Local Plan allocated virtually all of the Hardwicke Parish land east of the A38 for one of the largest strategic developments in the Stroud District. The 1748 dwellings of Hunts Grove was extended by 750 dwellings in the current SDC Local Plan. This 2500 dwelling development with Local Service Centre was a major consideration during the compilation of the HNPD.
- 7 Hunts Grove is currently less than 10% complete. The original master-plan for the Local Service Centre has recently been changed to accommodate the Hunts Grove extension. The full implications of such a large development and its effect on Hardwicke Parish would never have been understood until late in the development. This fundamental change to the location of the Local Service Centre can only have delayed this understanding and changed the underlying assumptions on which decisions have been made.
- 8 The map below shows the main character areas of Hardwicke Parish with the areas of Original Hardwicke overlay on it. East of the 38 is East Hardwicke, location of the Hunts Grove development. The current urban area is contained in the Development Settlement Boundary to the North of the Parish. the remainder is rural countryside.
- 9 The map demonstrates that any Infringement of a major or strategic development into the areas west of the A38 will inevitably change the setting of these areas. The consequential change in the character of Hardwicke would dilute the rural setting of the area to a point whereby Gloucester City urban

area is indistinguishable from Hardwicke Village, thus compromising its validity as a tier 3 settlement.



Future Strategy for the Gloucester Fringe

10 The current guiding principles for the Gloucester Fringe states ‘...Development at Hunts Grove to be physically contained and limited by A38 / M5 and the geographical and functional distinctness of Hardwicke village and Hunts Grove will be maintained...’. I believe this is a valid principle that could be extended into a policy that sets the A38/M5 corridor as being the southern extent of the Gloucester urban area. The map below shows how such a policy might fit into the preferred strategy for Hardwicke.



Part 2

11 Observations on the list of 40 key issues

11.1 Issue 3. Addressing the high level of daily commuting out of and into the District, particularly out commuting to Bristol, Gloucester, Cheltenham and Swindon.

11.1.1 The obvious way to minimise the high level of commuting is to allocate employment close to housing concentrations. Continued employment development adjacent to Gloucester will continue to attract employees living in Gloucester or commuters from Stroud. This will increase the pressure on Gloucester housing needs that will find itself into the JCS and the hence to Stroud when the JCS need cannot be fulfilled in their area.

11.2 Issue 4. Working with other local authorities and statutory agencies to investigate transport improvements to link Stroud to Bristol, the Midlands and Wales.

11.2.1 If transport links are improved won't this encourage more commuting and hence work against issue 3.

11.3 Issue 10. Working with neighbouring authorities to meet the needs of the housing market area as a whole.

11.3.1 I understand the duty to work with neighbouring authorities if they identify an unfulfilled need but to work as a matter of course in meeting their needs seems a tad retrospective. By this I mean that the idea of regional housing strategies was abolished and replaced by the Localism Act and NPPF; why go back to a process that was replaced some time ago.

11.4 Issue 11. Tackling the acute lack of affordable housing in the District.

11.4.1 If this is a key issue then why have 2 of the 5 objectives in the STROUD DISTRICT COUNCIL – HOUSING STRATEGY 2015-2019: ACTION PLAN – MONITORING AUGUST 2017 been on hold since 2016?

11.4.2 The need for affordable housing is appreciated, but until the stranglehold by developers over the market is broken then real progress will never be made. I understand that a recent decision by DCC allowed a mixed market/affordable development to be built on an exception site. If correct then this precedence could open door to developers using inappropriate land to meet their own needs rather than the needs of the community. Coupled with the ever-reducing percentage of affordable homes required on larger developments due to the need for developers to make a profit then it becomes clear that the whole system is skewed towards the developer rather than the needs of the community. The current system is flawed.

Part 3

Local Plan Review Questions

12 **Question** - We would like to understand what you believe to be the key issues relating to places in the District and future land use needs. Are they broadly the same as those identified in the current Local Plan? Or are there new issues emerging that we need to take account of in preparing the new Local Plan?

12.1 Response - The current list of key issues is comprehensive and remain generally valid. Unfortunately one of the key issues that impact across most areas is transport infrastructure. Whilst not strictly part of the local planning process the issue is integral to the success of all plans at any level and remains one of the fastest growing limitations to the success of what would otherwise be effective plans. Decisions based on current modelling are consistently challenged and often proven valid as time progresses. Assessment against planning applications appear to be simply a numbers game; if the model says there will be no significant effect then the response is positive. This takes no account of known local traffic and transport issues.

13 **Question 1 a)** - What are your priorities for Stroud District? Can you list your top 5 issues, challenges or concerns for the next Local Plan? You could pick five from our list of 40... Or tell us if we have missed something.

13.1 Priorities

13.1.1 Issue 9. Meeting the District's identified future housing needs including the particular needs of the elderly and the needs of the travelling communities.

13.1.1.1 The Hardwicke Housing Needs Assessment identified a need for housing that meets the needs of the elderly. The lack of suitable accommodation to move to within Hardwicke results in two person families living in dwellings more suitable for families as there is nowhere locally to downsize.

13.1.1.2 This is another example whereby the needs of the developer to make a profit comes above the needs of a particular community.

13.1.2 Issue 13. Providing the right size of accommodation to meet local needs (particularly for smaller, cheaper market and affordable homes) and to help with social cohesion.

13.1.2.1 The Hardwicke Housing Needs Assessment identified a trend towards smaller families in line with National trends. Whilst there is no identified need for housing in Hardwicke smaller developments within the settlement boundary continue to feature larger houses as these are more profitable for the developer. If the trend is for smaller dwellings then we should refuse any development that does not provide what the community needs in the future.

13.1.3 Issue 17. Maximising the potential of brownfield and underused sites to contribute to housing supply.

13.1.4 Issue 18. Achieving a better transport system, to help reduce CO2 emissions, with an emphasis on limiting car use by extending the cycling and walking network and making improvements to public transport.

13.1.4.1 This is important but a car will always be seen as a necessity outside cities therefore it is important that sufficient space is allocated for parking and more importantly roads and streets are wide enough to accommodate parking and the passage of emergency vehicles. The current allocation of 1.5 parking spaces for new developments and the apparent love of narrow roads in new developments such as Hunts Grove needs to be challenged. Trying to drive changes in behaviours by making it difficult to use a car does not work. It may be nice for maximising profit but it does not promote social cohesion in the community.

13.1.5 Issue 19. Conserving and enhancing Stroud District's countryside, landscape and biodiversity, including maximising the potential for a green infrastructure network across the District.

13.2 Response

13.2.1 As mentioned, the biggest issue, concern and challenge is sorting out the supporting infrastructure for the plan. Too often a supporting infrastructure framework is agreed in the outline planning submission but somehow morphs over time into something that is different from the original concept, and it never seems to be an improvement. This is particularly true of transport infrastructure. Junctions appear to reach saturation point way ahead of that predicted in the modelling used to agree the plan resulting in ever growing congestion. There has to be something wrong with the process when traffic backs up onto motorways in an area that has experienced deaths in the past from that very scenario. I recommend that a **totally independent** validation exercise be undertaken for each application that has a major impact on local transport to ensure the Highways Agency and developer evidence are valid.

13.2.2 Another growing concern relating to infrastructure is the trend toward developers forming 'management companies' to manage the money allocated to provide the supporting infrastructure of the development. The money surely belongs to the community therefore their representatives should manage the resource rather than the developer being allowed to continue taking administration fees from the fund. This could be achieved by insisting that at least 50% of any management organisation to manage the funds must consist of community representation or the Parish Council.

13.2.3 One of the largest challenges is how to retain our rural characteristic. The district is basically rural with a few large towns providing its services. Gloucester, Cheltenham and other neighbouring areas continue to demand more space as it grows and therefore mounts the largest challenge to Stroud's rural character. My main concern is the apparent desire to meet the needs of other surrounding authorities, particularly the Joint Core Strategy. Whilst accepting the NPPF edict to assist in meeting the development needs of neighbouring authorities if they cannot meet their own development needs, it should only be when that authority have

exhausted all their own options. There cannot be an assumption that such a request will happen as a matter of course otherwise an authority could protect its own space by requesting assistance from its neighbours when refusing planning permission on their own land. I believe this has already happened with the JCS whereby they rejected developments in their own area then looked to Stroud to meet their outstanding needs. It does not make sense for the Stroud Local Plan to build a contingency in its Local Plan for other authorities when no firm need has been established. If the need develops and is validated at National level then the evaluation process can begin, to include it in the plans ahead of that point is inviting a request for assistance or unnecessary speculative development requests.

14 *Question 1b) - Do you have ideas and suggestions for how the Local Plan might tackle particular issues?*

14.1 I think the current local plan is a well constructed and reasoned plan requiring minor updates to reflect recent changes and meet the needs of the area in the extended period of the plan.

14.2 The underlying data and core information used in the evidence for the Local Plan is dated so an update to reflect the current situation is necessary to ensure that any plan updates reflect the current situation, not the past situation.

14.3 I would like to see a **totally independent** validation of the traffic model used in each planning application that has a major impact on local transport to ensure the Highways Agency and developer evidence are valid. There is little faith in the current input from the Highways Agency and a validation would put the matter to rest once and for all.

14.4 I would like to see a requirement that any organisation formed to manage infrastructure funds dedicated to the on-going supply or maintenance of community infrastructure must have at least 50% of its quorum/management/committee represented by the community or the local Parish/Town Council.

14.5 In a recent case a small but strategically important piece of land was sold privately after the Local Authority rejected an offer of the land. Changes to the land had a disproportionate effect on an important aspect of the Hardwicke transition between its urban and rural aspect. Residual parcels of land from a development are sometimes offered to the Local Council for their use. I believe that first refusal should be with the Local Council, followed by the Parish Council. Only then should the space be put up for public sale.

15 *Question 2.1a What do you think are the biggest challenges facing the local economy in Gloucestershire for the future? How can we help to address these? Does Stroud District have a specific role to play, relating to business start ups and specialist technologies or should we seek to compete with other locations for growth?*

15.1 Stroud has many natural attributes that make it competitive. Whilst highly desirable to remain competitive it would be folly to chase growth unless it is needed to sustain the local population. Excessive business capacity requires more employees that means either greater levels of commuting or growing the already overstretched local housing need.

16 *Question 2.1b Do you think there is a need for further employment land allocations? If yes what types of premises are required and where should they be located?*

16.1 Individuals that have an overview of the district and regional employment needs can best answer this. Certainly in the Hardwicke locality there is a surplus of employment land with capacity for substantial more units at Hunts Grove and nearby at Quedgeley East, each site are currently allocated as employment land in the Local Plan. .

17 *Question 2.1c Do you think locating growth adjacent to M5 junctions should be supported; or would continuing expansion of employment land at existing settlements/sites be preferable?*

17.1 A mixture of both really. It seems logical to locate adjacent to motorway junctions but the well-publicised traffic problems at junction 12 and 13 shows why this approach causes problems therefore it seems logical to use both approaches.

18 *Question 2.1d Should there be increased flexibility to allow other job generating uses on all employment sites or would this limit the options for those companies operating in the B classes? Should increased flexibility be allowed only on some sites? Please specify any sites where a more flexible approach could be taken. Alternatively, a percentage threshold, in terms of units or site floor space, could be identified for non B class employment uses, which might help to provide services to other businesses?*

18.1 There needs to be a balance across the board, but you need to have a percentage ration for each sector of employment. Heavier industrial units should be carefully placed away from residential space.

18.2 Whilst the idea of increased flexibility sounds inviting, many businesses have consistently proved that given an inch they will take a mile. Whilst the current process might appear overly restrictive I would be concerned if greater flexibility were to be given without very strict overseeing from the Local Authority; and lets face it, they have enough pressure on their budgets already.

18.3 Business areas need to have supporting infrastructure. For example units in Waterwells appear to exist in a vacuum with limited shops/eating places and other supporting infrastructure within easy walking distance.

19 *Question 2.1e Should the Local Plan look to promote further home working, encourage development of live work units and co working facilities? Is there a specific need in your area?*

19.1 This has to be encouraged to reduce journeys thus benefitting lifestyles, road infrastructure and the environment. I guess one of the biggest restrictions to this is the lack of effective broadband in rural areas.

20 *Question 2.1f Should the Local Plan look to promote further farm diversification to reflect changing farming practices and to avoid rural dereliction, or does the pattern of rural development need more control to avoid further adverse impacts on the countryside, landscape and local communities?*

20.1 A lot will be dependent of what happens after we leave the EU and what subsidies remain. Nobody wants dereliction of the countryside, or impose a regime that dictates how rural communities go about their business. But control is needed to secure sufficient countryside to retain our rural status. If the Local Plan eases the current controls then it must provide a counter balance by delegating more authority to local communities in how their area is shaped.

21 *Question 2.2 Do you agree with the options set out for improving our town centres? Have we missed any important options? What do you consider to be the most important actions to undertake?*

21.1 I have limited understanding of town planning and management but the approach appears sensible and logical. I particularly like the increased signing of local facilities and services.

22 *Question 2.3a Tell us about housing needs and opportunities in your area: Does your neighbourhood provide opportunities for local people to access the housing market, bearing in mind the growing gap between local incomes and house prices? Are there opportunities in your area for households to rent reasonably-priced properties? Are younger people in your neighbourhood able to access housing without moving elsewhere? If older people in your neighbourhood wished to downsize to smaller, more suitable properties in the area, are these opportunities likely to exist? Would individuals or small groups be able to locate suitable land for self-build projects in the neighbourhood? Do you know of other unmet housing needs in your neighbourhood?*

22.1 Hardwicke conducted a Future Housing Needs Assessment for our NDP that included a GRCC conducted Housing Survey and Housing Needs Analysis. The Hunts Grove development easily met the needs identified however a need for dwellings dedicated to the elderly was identified to free up current family size housing stock.

23 *Question 2.3b Do you think that local housing need surveys should also be used to influence the housing mix on local for-sale housing sites?*

23.1 I believe it should be mandatory for any market housing to primarily meet the housing need of any local housing survey. If a Parish has gone to the trouble and expense of investigating their local needs then their findings should be given priority.

24 *Question 2.3c Do you know of any suitable land for development to meet the housing needs of your neighbourhood, or do you have suggestions about how or where these needs might be met?*

24.1 There is no local identified need however preferred options are covered in the introductory paragraphs of this response.

25 *Question 2.4a Does your neighbourhood lack a particular form of community facility, open space or sports facility? If so we would like to know about that need.*

25.1 An Open Space assessment and Services and Facilities Assessment was conducted for the NDP. An update is planned for 2023 to reflect the additional facilities due to be provided by the recently re-positioned and reconfigured Hunts Grove Local Service Centre.

26 *Question 2.4b Are there existing facilities or local spaces that you consider important for protection? If so please tell us and explain why they are of particular importance*

26.1 These are identified in the following assessments compiled to support the Hardwicke Neighbourhood Development Plan

- Ecological Assessment;
- Open Space Assessment;
- Facilities and Services Assessment;
- Local Character Assessment;
- Listed Buildings Assessment;
- Key Views Assessment.

26.2 These will be updated in parallel with the LP review.

27 *Question 3.1 How should we meet future development needs?*

- *Option 1: Continue to concentrate housing and employment development at a few large sites located adjacent to the main towns in the district*
- *Option 2: Take a more dispersed approach with some medium sized housing and employment sites on the edge of the larger villages, as well as towns*
- *Option 3: Disperse development across the district with most villages including at least one small to medium site allocated to meet local needs*
- *Option 4: Identify a growth point in the district to include significant growth, either as an expansion of an existing settlement, or to create a new settlement*
- *Option 5: Do you have an alternative strategy option that you would like us to consider? Do you have a preferred option? Or would some combination of these approaches be the best way to meet our future needs? Please explain why.*

27.1 In my view the key driver for this question is the retention of the district as a rural community. Whilst some smaller villages need small levels of development for their community to survive any major or strategic developments need to be concentrated at a single growth point that minimises the impact to the rural characteristics of the district.

28 *Question 3.2a We welcome views on whether the following broad locations should be considered for development, if needed, or whether you can identify better sites in Stroud District or in neighbouring areas that should be assessed:*

G1 South of Hardwicke (housing/community uses)

G2 Whaddon (for housing/ employment/ community uses)

G3 South west of Brockworth (for housing/ community uses)

G4 South of M5/J12 (for employment uses)

28.1 I refer you to Part 1 of this response.

29 *Question 3.2b Could any further development help to establish a firm southern landscaped boundary to the city, in effect a “rounding off” of the urban area, or would it simply exacerbate further sporadic growth?*

29.1 I refer you to Part 1 of this response.

30 *Question 3.2c Are there any specific community needs arising from Hardwicke, Haresfield, Brookthorpe, Whaddon or Upton St. Leonards that could be met in these areas; and what safeguards could be put in place to protect the local character and setting of existing villages?*

30.1 I refer you to Part 1 of this response.

31 *Question 3.4 Do you agree with the current hierarchy-based approach towards identifying settlements suitable for different levels of development? Is there a different approach you would prefer? Do you agree with the different tiers identified in the current Local Plan and the scale of development proposed for each tier? Are any of the settlements in the wrong tier and, if so, for what reason?*

31.1 The approach makes sense however its application in practice does not seem to follow. The level of development allowed in Hardwicke since the Local Plan was made is not conducive to a tier 3 settlement.

32 *Question 3.5a How should development proposals on the edges of our towns and villages be managed?*

Option 1: Continue with existing settlement development limits amended as necessary

Option 2: Assess proposals on a case by case basis using broader criteria (e.g. landscape impact; form of settlement, proximity to services, etc.)

Option 3: Continue with settlement development limits but expand the types of development that are allowed beyond them in the countryside

Option 4: Do you have an alternative approach that you would like us to consider

32.1 Option 1, with no amendment.

33 *Question 3.5b Are there any changes to existing settlement development limits that you would like to suggest?*

33.1 Only to provide a little flexibility to small villages whose actual existence

needs development outside the settlement boundary.

34 *Question 3.6 Read through the settlement summaries over the following pages and tell us whether you agree with the potential broad locations for growth, if future housing, employment or community facilities are needed. Where more than one location is identified you can tell us which is the best option. You may identify an alternative or additional location or site by indicating so on a map. You may also identify broad locations or sites at smaller villages that you think are appropriate for some development. In all cases, please specify whether the site is appropriate for housing, employment, retail and/or community uses including open space.*

34.1 I refer to part 1 for the preferred strategy on the Gloucester Fringe.

34.2 The area G4 south of M5/J12 brings development over the M5, I would prefer to see the M5 used as a firm southern limit to Gloucester development.

34.3 Using area G1 will bring the Gloucester edge further down the side of the Gloucester/Sharpness canal and once this is done you might as well continue on down to form a development corridor between the M5 and canal. This would destroy the character of the surrounding area of the canal.

34.4 G2 and G3 are on the edge of Gloucester and are naturally bounded by the M5. If this area is developed then the south Gloucester corridor could extend further south between the A38 and M5 leaving the setting of the Gloucester/Sharpness unharmed.

35 *Question 4.1 Are there any specific additional local studies or data that you believe are needed to inform the Local Plan review? Have you any advice on the scope or content of any of these studies? Have you prepared, or are you preparing your own studies, which may help to inform the Local Plan?*

35.1 The current Local Plan was adopted in 2015. It underwent a revision between draft and final submission that took some considerable time along with an extensive examination. This means that much of the considerable data that fed into the current Local Plan will be dated by the time the revision draft is compiled.

35.2 For some areas this will not be an issue but in areas with a fast moving development and population change it will be important to use updated information. It would be useful if SDC produced a centralised, easily accessible on-going list of all documents used to inform their review. Those found to be considerably out of date should be updated. This would give the community an opportunity to check the data being used in the review.

35.3 It is also important that SDC ensure communities are kept up to date with all the data being used in the review.

35.4 For example the Stroud District Settlement Role and Function Study December 2014 used in the current Local Plan used data that is clearly at odds with population data used in the Hardwicke Neighbourhood Development Plan based on ONS statistics.