



Kingswood Parish Council Hearing Statement

Stroud Local Plan Examination

Matter 6h – The Wotton cluster site allocations

February 2023

This Hearing Statement is prepared and submitted on behalf of Kingswood Parish Council (KPC).

Matter 6 Site allocations

Issue 6 - Are the proposed housing, employment and mixed use site allocations justified, effective and consistent with national policy?

Matter 6h The Wotton cluster site allocations

Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood

Q48. The site is allocated for 50 dwellings and open space uses.

- a. What type and level of open space uses would be required or is this covered by other policies?**

KPC Response:

1. The Council’s Stroud Open Space and Green Infrastructure Study (Wotton Sub Area Analysis)¹ indicates that there is a gap in access to Amenity Green Space and Youth Play Space in Kingswood.

Typology	Current Access
Allotments and community orchards	Good access to allotments in parishes with over 1000 population.
Amenity Green Space	Gaps in access in North Nibley, Kingswood and Hillesley.
Parks and Recreation Grounds	Access to parks and recreation grounds is good across the parishes with over 1000 population.
Children’s play space	Access to children’s play space is good across the cluster with all the settlements with populations over 500 having access.
Youth Play space	Gap in access in Kingswood.
Accessible Natural Green Space	Generally good access against the 960m access standard with a small gap in the south of Wotton-under-Edge settlement. Also good access against the ANGSt standards 100+ ha but against the 20+ha standard there is limited access for the southern part of the cluster.

Figure 1: Table 3 of EB41 – Stroud Open Space and Green Infrastructure Study (Wotton Sub Area Analysis – Part 2 of 2)

2. Delivery Policy DHC7 provides the open space quantity and access standards for each open space ‘typology’. This combined with the Open Space Study should be used to determine the requirements for open space in Kingswood and Policy PS38 should quantify the amount and type of open space required as part of this scheme.
3. Currently the Open Space Study is too strategic in terms of its look at the whole of the Wotton Cluster when it comes to very localised needs which is what is required when considering the requirements of Site Allocations in Kingswood.

¹ EB41

4. KPC considers that there is currently a deficiency in playing fields in the village for the recreational uses required. There is a particular deficiency in space for the football club and the cricket club to operate.

- b. The policy states that ‘local biodiversity’ issues need to be addressed for this site. The policy also refers to ‘integrating the development into the landscape setting’. The supporting text states that development will retain and enhance existing trees and hedgerows to support these two aims, but this is not set out in the policy. Is this approach justified? Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?**

KPC Response:

5. The site has a wide range of sensitive habitats. These should be clearly set out in the policy rather than a generic reference to ‘local biodiversity’. Based on the Applicant’s surveys these habitats include the following and were subject to further surveys in 2020 (please see below regarding the Council’s Biodiversity Team objecting to the scheme). KPC is not aware of these further surveys having been undertaken.
 - Bats
 - Great Crested Newts and Toads
 - Dormouse
 - Reptiles
 - Birds
 - Invertebrates
 - Hedgehogs / Brown Hare

6. The Council’s Biodiversity Team has objected² to the planning application and are awaiting further information to be submitted by the applicant therefore the surveys are incomplete and SDC should make clear what the biodiversity requirements are for the site. Therefore

7. Likewise, the landscape requirements need to be made clear as the sensitives are known by SDC for this site which are set out in the Council’s Landscape Sensitivity Assessment Part 2³ which states:

“The sensitivity of this area lies in its open pastoral character of the south, views from local footpaths and minor roads, the riparian corridor to the east and the mature trees and hedgerows. Its value lies in the PROWs passing through the area. Housing development may be appropriate in the small fields just south of Wickwar Road and east of the wooded track, adjacent to existing housing and screened by existing hedgerows which would need to be conserved and retained.”

² Biodiversity Team Comments 9th November 2020 https://publicaccess.stroud.gov.uk/online-applications/files/EBE116E95741E84BA316B5D3064AE37F/pdf/S.20_0887_FUL-BIODIVERSITY_TEAM-2762255.pdf

³ EB36A – Area Ref K03 – Page 200

- c. **The supporting text also refers to walking and cycling routes being within the site but these are not set out in the policy. Can the Council clarify the reasons why and explain whether they are justified as requirements?**

KPC Response:

8. The supporting text states:

“High quality and accessible walking and cycling routes within the site will link with and enhance where necessary the existing network.

9. This requirement should be included in the policy text as it is justified as we explain below.
10. The Pre-Submission Local Plan’s own aspirations for the Wotton Cluster, states that *“designing safe green walking and cycle routes and achieving a better public transport system”* is a top priority for the area and whilst the supporting text is somewhat helpful it should be more site / locally specific and included in the policy.
11. Wickwar Road has no dedicated footpath or cycle path along the Wickwar Road from the main entrance to the site to access the centre of the village, the secondary school (KLB) which is 0.7 miles away and Wotton under Edge which is approximately 1.7 miles away. As we outline below this will force the new residents of the development to drive for their services including drive to school for drop off and pick up.
12. It is understood from the IDP⁴ that there is across border initiative to provide an active travel route or greenway linking Kingswood and Wotton under Edge to Charfield and that Sustrans have been commissioned to carry out the initial work on the route and are currently undertaking a final design phase. The Allocation Policy PS38 should include the requirement for the development to link into and contribute to this project and infrastructure.



Figure 2: View looking east from Wickwar Road (B4060) Source: Google

⁴ EB69 Page 30



Figure 3: Traffic along the Wickwar Road (B4060) Source: Google



Figure 4: Examples of School Coach safety hazard, congestion and traffic in Wotton under Edge

13. We would encourage the Inspectors to undertake site visits to Kingswood and Wotton under Edge during the school drop off or pick up. In the meantime, we provide a link to a video of the Wotton Road and Charfield Road intersection in Kingswood as evidence of the health and safety risk to all users of the road. <https://youtu.be/fmm1HVyUxal>.

d. The requirement for highway safety improvements to access services within the village is referenced in the policy? What specifically would the development need to provide, and would they be justified and viable?

KPC Response:

14. KPC is concerned with the increased traffic impact on the local roads in Kingswood which does not appear to have been suitably assessed by SDC in its

site and technical evidence base. Whilst the Allocation Policy states that “Off-site highway improvements will be provided to facilitate safer, accessible pedestrian and cycle access to key destinations in the village” this fails to set out the specific issues and what is required to overcome the issues. Please see the key issues outlined below and refer to KPC’s Regulation 19 submission for more information.

- There are no pedestrian crossings within Kingswood.
 - The biggest concerns are speeding and lack of safe crossing for children.
 - In particular on Wickwar Road with children trying to access the playing field and children crossing Rectory Road and Charfield Road to access the primary school and the secondary school (KLB.)
- The pavements are very narrow and there is not room for two children to walk side by side. Frequently children walk in the road. All of the school buses access KLB via the village of Kingswood.
- KPC has purchased 4 ANPR cameras and are working with the Police to reduce speeding on Wickwar Road, Charfield Road and Wotton Road (KLB). KLB have very kindly allowed the camera on to their land. The Wotton camera regularly records vehicles doing 60 and 70 in a 30mph limit. See data below.

Wotton Road	Speed	Speed	Speed	Speed	Speed	Speed	Speed	Speed	Speed	Speed				
Sept	-30	31-34	35-39	40-45	46-50	51-55	56-59	60-64	65-69	70	Total Vehicles	Total above 35mph	% below 30	%above 35
04/09/22 - 09/09/22	15295.00	3486.00	1915.00	589.00	84.00	45.00	6.00	3.00	2.00	0.00	21425.00	2644.00	71.39	12.34
11/09/2022 - 17/09/22	16963.00	3542.00	1827.00	528.00	103.00	21.00	5.00	5.00	1.00	0.00	22995.00	2490.00	73.77	10.83
18/09/2022 - 24/09/22	15741.00	3222.00	1792.00	570.00	81.00	23.00	5.00	1.00	0.00	1.00	21436.00	2473.00	73.43	11.54
25/09/22 -01/10/22	16941.00	3601.00	1853.00	589.00	88.00	27.00	6.00	2.00	0.00	0.00	23107.00	2565.00	73.32	11.10
	64940.00	13851.00	7387.00	2276.00	356.00	116.00	22.00	11.00	3.00	1.00	88963.00	10172.00		11.43

Wickwar Road	Speed	Speed	Speed	Speed	Speed	Speed	Speed	Speed	Speed	Speed				
Sept	-30	31-34	35-39	40-45	46-50	51-55	56-59	60-64	65-69	70	Total Vehicles	Total above 35mph	% below 30	%above 35
04/09/22 - 10/09/22	16104.00	2608.00	858.00	167.00	28.00	2.00	0.00	0.00	0.00	0.00	19767.00	1055.00	81.47	5.34
11/09/2022 - 17/09/22	16999.00	2551.00	861.00	162.00	19.00	2.00	1.00	1.00	1.00	0.00	20597.00	1047.00	82.53	5.08
18/09/2022 - 24/09/22	15824.00	2261.00	725.00	144.00	16.00	3.00	1.00	0.00	0.00	0.00	18974.00	889.00	83.40	4.69
25/09/22 -01/10/22	16334.00	2588.00	897.00	173.00	16.00	4.00	3.00	0.00	0.00	0.00	20015.00	1093.00	81.61	5.46
	65261.00	10008.00	3341.00	646.00	79.00	11.00	5.00	1.00	1.00	0.00	79353.00	4084.00	82.24	5.15

Figure 5: Wotton Road and Wickwar APNR data September 2022

- Wotton Road at drop off and pick up time and (and weekends during sports fixtures at KLB and Wotton Sports Foundation site) is dangerous. Pedestrians from Kingswood are forced to walk in the busy road as cars are parked partially on the pavement.
- The route from Wotton under Edge to KLB is much safer.

15. KPC recently undertook a survey of local residents regarding highways issues in the area to better gauge what the community considered to be the key issues and potential solutions. The results of this survey can be accessed on KPC’s website⁵.

⁵ <https://kingswoodparishcouncil.gov.uk/highways-safety/>

16. As a result of the local survey and the ongoing problems in Kingswood the Parish Council has agreed a set of Highways Objectives (<https://kingswoodparishcouncil.gov.uk/highways-safety/>) which are reviewed at every parish council meeting and the actions set out in the survey being taken forward in consultation and collaboration with GCC and SDC.
 17. We note the objection from Highways (Gloucestershire County Council) to the Application⁶ on a number of grounds and recommends that the application be refused. This objection highlights the problematic highways safety issues with the site and the challenges of developing a scheme in this unsustainable location.
 18. There is no evidence to suggest that improvements would not be viable.
- e. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?**

KPC Response:

Increased Traffic

19. See KPC's comments above.

Schools

20. KPC considers that this allocation is inappropriate due to the pressure it will place on existing infrastructure services and facilities in particular the capacity of local schools to cope with the proposed growth.
21. Table 2 below reveals the impact of the additional place requirements on local school capacities, as based on Gloucestershire County Council's school places data (January 2021 census). The below table assumes that the 20.5 (rounded up to 21) additional primary school places required are evenly distributed across all schools.

⁶ GCC Letter dated 22nd August 2022 (https://publicaccess.stroud.gov.uk/online-applications/files/F02B0D7D82F25DFD25FFB5645C249162/pdf/S.20_0887_FUL-HIGHWAYS_COMMENTS-2916742.pdf)

Estab.	School	PAN	Max. capacity (based on PAN)	R	1	2	3	4	5	6	Total	Total + site allocation PS38 requirements
5204	Blue Coat C of E Primary School	45	315	46	36	38	42	48	43	50	303	308.25
5209	The British Primary School	30	180	26	19	19	31	24	30	28	177	182.25
2075	Kingswood Primary School	17	102	13	17	15	17	20	18	17	117	122.25
3367	Hillesley C of E Primary School	8	56	7	7	2	6	4	5	3	34	39.25

Figure 8: Gloucestershire County Council's school places data and PS38 educational requirements

22. To demonstrate the severity of the issue locally, Kingswood Primary School has objected⁷ to the current planning application at Wickwar Road (S.20/0887/FUL) at South of Charfield Road (S.20/1083.OUT) which was subsequently withdrawn. Kingswood Primary School states that the objection is raised *“solely on the grounds on the lack of capacity at Kingswood Primary School and a complete inability to be able to modify the school in order to accommodate the proposed pupil yield from the developments”*.

23. As shown below, this requirement was omitted within the Pre-Submission Local Plan Review. It is clear that the Pre-Submission Local Plan (and plan-making process) has not adequately considered or addressed local school capacity issues. As such, the Pre-Submission Local Plan does not accord with paragraph 95 of the NPPF which states that *“it is important that a sufficient choice of school places is available to meet the needs of existing and new communities”*.

⁷ Kingswood Primary School Email dated 24th August 2020 https://publicaccess.stroud.gov.uk/online-applications/files/5BA0A4F6E429AEFF84CB61DAF685A4D/pdf/S.20_0887_FUL-KINGSWOOD_PRIMARY_SCHOOL-2545057.pdf

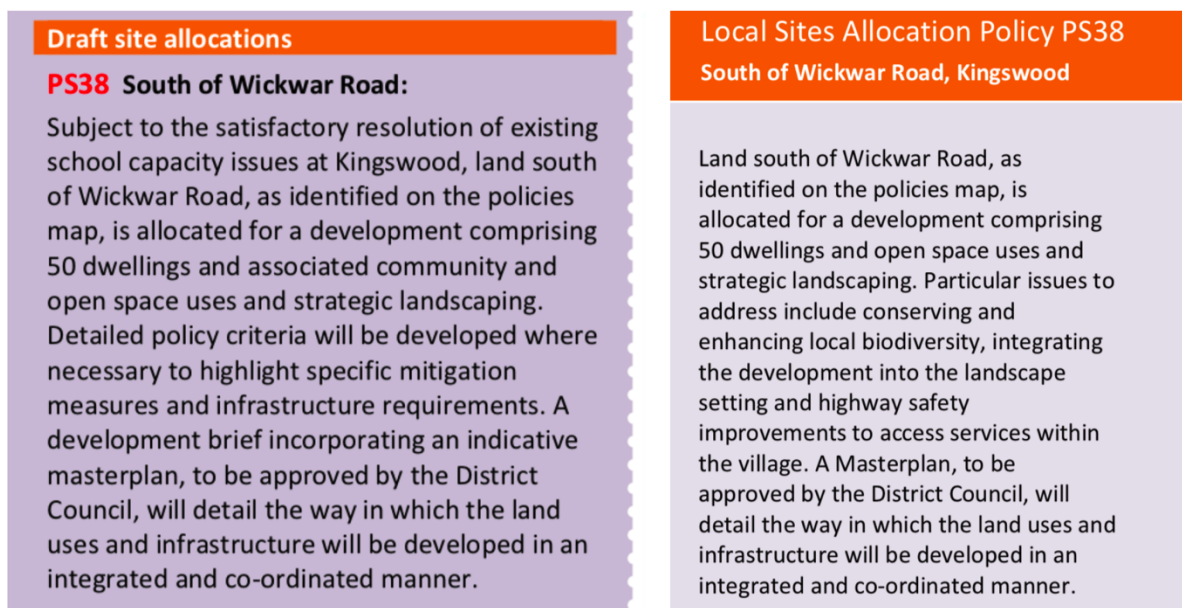


Figure 9: **Left** - SDC Draft Local Plan Policy PS38. **Right** – SDC Pre-Submission Local Plan Policy PS38.

Employment Allocation Policy PS47 Land west of Renishaw New Mills

Q49. The site is 10 hectares in size and is allocated as an extension to the key employment site EK17 Renishaw New Mills for a mix of office, B2 and B8 uses.

- a. Is an extension to the existing employment site in this location justified by robust evidence?**

KPC Response:

24. The Council’s Employment Topic Paper (EB7) is notable for its lack of any detail regarding its justification for its assessment and selection of employment allocations with no explanation whatsoever regarding the proposed extension to Renishaw New Mills. This is disappointing given that it is a significant extension of 10 hectares which is the second largest employment allocation proposed in the Local Plan (along with two other sites – Sharpness and Stonehouse Eco-Park).

Landscape

25. The Landscape Sensitivity Assessment (EB36) does not assess the proposed allocation at Renishaw New Mills and this is confirmed by the Sustainability Appraisal. This is a significant omission by SDC in its consideration of the site.

26. As one can see below from the ‘Landscape Sensitivity to Employment’ mapping in the Landscape Sensitivity Assessment all of the areas that were assessed

around Kingswood and Wotton under Edge were assessed as ‘High Sensitivity’. Whilst one cannot immediately conclude that the proposed Renishaw New Mills allocation would result in the same ‘High Sensitivity’ assessment, it would appear that given its location that the landscape sensitivity would be as high if not higher in this location.

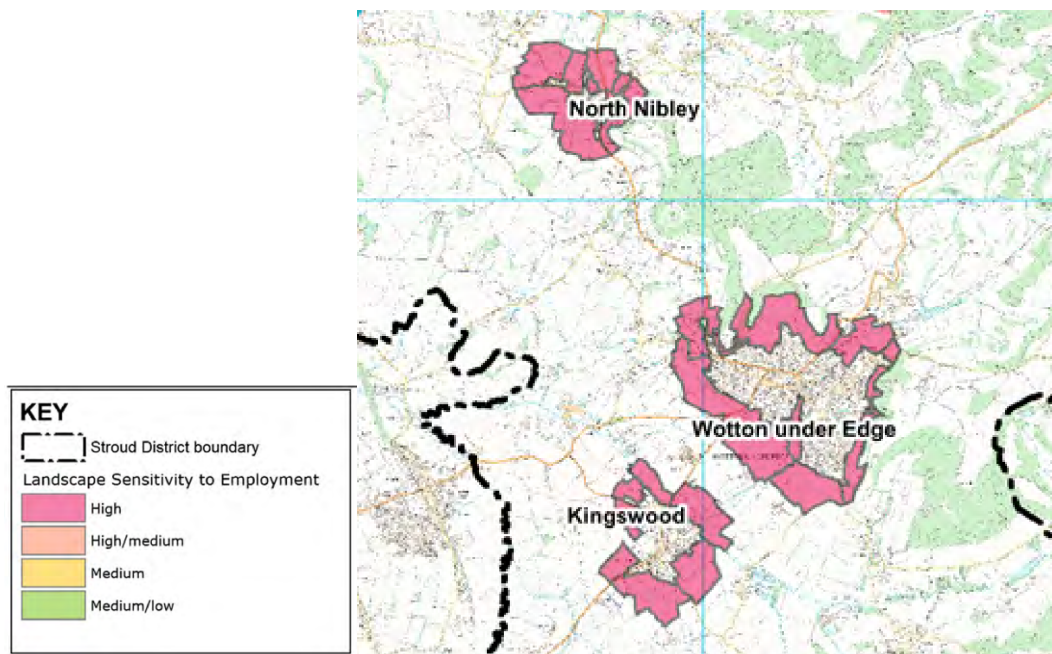


Figure 10: EB36 - Stroud Landscape Sensitivity Assessment (Dec 2016) – Figure 2 – Landscape sensitivity to employment development

Sustainability Appraisal

27. The Sustainability Appraisal is effectively saying that because there is no landscape evidence and no consideration of what the form/design the development could take they are unable to assess this site in the Sustainability Appraisal. This is entirely unsatisfactory when other proposed allocations have had the benefit of a Landscape Assessment. This could have a considerable impact on the SA of the site and could have influenced the Council’s decision to include the site as an allocation.

28. In respect of Flooding the SA assesses the site as having a ‘Minor Negative Affect Likely’ stating the site is mostly outside of flood zones 3a and 3b. We consider flooding to be a much more significant issue than has been picked up in the SA.

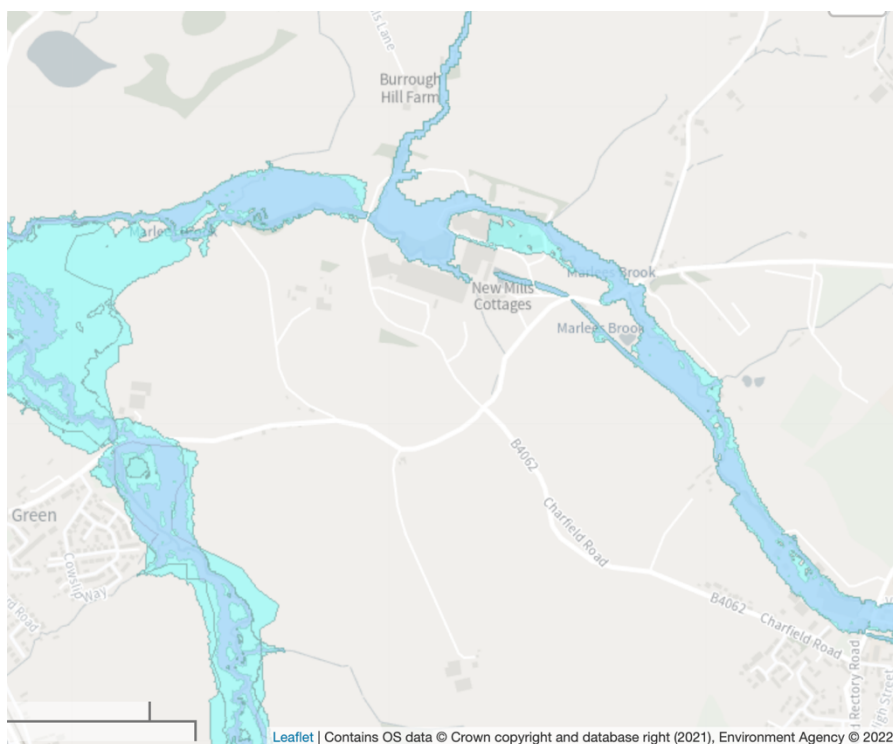


Figure 11: EA Flood Risk Mapping showing Flood Zones 3 and 2 on Renishaw Mills site

29. The SA does pick up that the site contains a significant portion of Grade 2 agricultural land that a significant negative effect is likely.
30. Whilst the SA scores the site positively for employment and economic growth, we do question what this is based on as the proposals for the scheme are virtually unknown in terms of what it would actually deliver in employment floorspace, jobs created or its economic impact locally.

Heritage

31. The Council's SALA Heritage Impact Assessment (EB52) of Site KIN012 – Land west of Renishaws determines that the site has 'Significant heritage constraints' due to the Grade II listed Lower Barnes Farmhouse at the centre of the site amongst a small complex of farm buildings and the setting of the Grade II* New Mills with the sites having a role in forming part of the rural landscape context on the approach to the mill / passing it on the B4058.
32. The Assessment recommends that there are several key open spaces which should be kept free of built development.
33. Clearly the Assessment considers there will be significant impact on areas that could be developed where it states that (our emphasis) *"the impact on the setting and significance of the listed buildings would likely preclude built development on some key areas of the sites, and constrain the developable area*

by up to half, in order to protect some key views and to retain a sense of the open rural landscape context of both the mill and farm”.

Employment Land Review (March 2021)

34. We note that the Employment Land Review and the Sustainability Appraisal refer to the site as being 9 hectares therefore it is unclear as to why the Local Plan is proposing the allocation for 10 hectares. This should be corrected.
35. The ELR (EB30) is ambiguous on details about the type of employment that will occupy the site. The ELR states the site will “*house manufacturing facilities for another enterprise of Renishaw owner*” and that it will take up 50-60 percent of the site i.e. 5.40 ha according to the ELR. It states that high value advanced manufacturing will occupy 60 percent of the site and that the remaining 3.6 ha remains available and is expected to accommodate related businesses in the supply chain sector/customer base of the new business and/or Renishaw but that no specific occupiers are identified but Renishaw is confident it can attract businesses once the main new occupier is established.
- **Type of Employment:** there is little evidence of the likely mix of employment uses that should be expected on the site. It appears that the new Renishaw enterprise will be for B2 uses and they consider this will take up to 60% of the site. For the remainder of the site it seems that it could be B8 and or E use for offices. Without some understanding of the likely uses how can SDC justify the allocation of the site? This could lead to the developer not making the most efficient use of land.
 - **Land Supply Calculation:** the ELR states the baseline employment land is 9ha. It states that 60 percent (5.4 ha) of this will be used for the new Renishaw enterprise. It then states the remaining 40% (3.6 ha) will be used for speculative development where this is not a specific occupier yet. The ELR then shows that the realistic ELR supply is actually 3.6 ha which presumably takes into consideration the heritage constraints although it does not explain how this figure is derived. Does it include exclusion of Grade 2 ACL and Flood Zones 2 and 3?
 - **Other Matters:** As of 2nd March 2021 Renishaw Plc two major founders and investors were in the process of selling their combined 53% stake in the business⁸. However, as of 7th July 2021 Renishaw Plc CEO Will Lees declared that the formal sale process has concluded as it has not identified a suitable buyer. This decision therefore provides much

⁸ <https://www.thisismoney.co.uk/money/markets/article-9317705/Founders-engineering-giant-Renishaw-sale-50-years.html>

uncertainty with regards to the future of Renishaw, particularly with respect to its proposed expansion. These concerns are further highlighted in Stroud District Employment Land Review (March 2021).

Site Name	Baseline Employment Land, ha	Comments	Market Segments Met Evidence of Deliverability	Realistic Employment Land Supply, ha
PS47: Renishaw New Mills	9.00	<p>Swinhay Developments (Renishaw) own the site.</p> <p>Agricultural land south and west of the Renishaw plant, and sharing a common access with that plant.</p> <p>Site will house manufacturing facilities for another enterprise of Renishaw owner. Stroud District Council in advanced pre-application discussions over the scale and nature of the development. This use will take up 50-60 percent of the site, i.e., 5.40 ha.</p> <p>As noted above, for Commitments, in completing numerous employment land reviews BE Group has noted that it is normal to exclude, from the realistic supply land which will be held for the exclusive use of an owner and will not be made available to meet wider needs. In effect, this land has become part of the</p>	<p><i>Development to meet the needs of a specific occupier – Plus associated supply chain businesses.</i></p> <p>Plans are well established and progressing for a high value advanced manufacturing business to occupy up to 60 percent of the site. The remaining 3.60 ha remains available and is expected to accommodate related businesses in the supply chain/customer base of the new business and/or Renishaw. No specific occupiers identified but Renishaw confident it can attract businesses, once the main new occupier is established. Renishaw to lead on delivery, tendering for developer partners as needed.</p>	3.60
		<p>curtilage of that facility rather than being an open/available employment site.</p> <p>Owner intends to develop the rest to provide a small business park for similar businesses/supply chain companies.</p> <p>Will have common access with Renishaw plant, via roundabout onto the B4058.</p> <p>Constraints:</p> <ul style="list-style-type: none"> Site contains a farm with a listed building. 		

Figure 10 : EB30 - Stroud District Employment Land Review (March 2021) (Page 153)

b. What type and level of open space uses would be required within the site or is this covered by other Plan policies?

KPC Response:

36. There is the need to protect the openness of the site and the setting of the heritage assets as explained above in the Heritage section however there is also a local need for more recreational space locally in the village.

c. The policy states that ‘local biodiversity’ issues need to be addressed for this site. The policy also refers to ‘integrating the development into the landscape setting’. The supporting text states that development will retain and enhance existing trees and hedgerows to support these two aims, but this is not set out in the policy. Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?

KPC Response:

37. These should be clearly set out in the policy rather than a generic reference to ‘local biodiversity’.

38. The landscape requirements should also be made clear in policy however the Council has not undertaken the landscape evidence as required therefore this

needs to be prepared first and consulted on before it can provide the appropriate Local Plan policy text.

- d. The supporting text also refers to walking and cycling routes being within the site but these are not set out as requirements in the policy. Can the Council clarify the reasons for this and explain whether they are justified as requirements?**

KPC Response:

39. The IDP refers to a 'cross border initiative' to provide an active travel route or greenway linking the settlements and a potential new station with MetroWest connectivity to Gloucester and Bristol. The Policy for Renishaw does refer to this however more information is required to understand more about this project and how it relates to Renishaw.

- e. The requirement for highway safety improvements to access services within the village is referenced in the policy? What specifically would the development need to provide, and would they be justified and viable?**

KPC Response:

40. Identifying a safe access point for the path to link with Kingswood is a major concern of KPC. Landowners along Wotton Road have so far refused permission for access.

- f. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?**

KPC Response:

41. KPC provides detailed representations on this in its Regulation 19 representations. KPC would like to see the following improvements in the Local Plan policy:

- Improvements to the access off the Renishaw roundabout if that is going to be the entrance for the new site as it is currently a safety risk;
- Public transport provision with a proper bus stop and integrated transport hub.

- Connections to the proposed Charfield Station in the form of a shuttle bus and also to Wotton under Edge so that employees can access the town without using their vehicles due to the lack of parking in the town.
- Review of the 50mph speed limit from Charfield and a 40mph speed limit considered for Wotton Road and Charfield Road.
- ANPR camera to be provided to enable KPC to manage the speed of traffic in partnership with the Police.
- Cycle provision.
- Provision of greenway links to Wotton and Kingswood.
- Trees for screening of the site
- Materials specification to be used so that it is not an expansive site of tarmac.
- Lighting should be low level and the hours allowed conditioned to prevent light pollution.
- Electric charging point provision.

END.