

4th December 2017

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB



Dear Sirs,

STROUD LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

I write on behalf of Crest Strategic Projects with regard to the current Local Plan consultation in respect of Crest's existing and emerging land interests within the District. I have followed the order of questions within the consultation document identifying those on which Crest have comments to make. This representation is concerned only with those questions/matters on which Crest has material submissions to make.

Question 1.0a: *What are your priorities for Stroud District? Can you list your top 5 issues, challenges or concerns for the next Local Plan?*

Response: Having regard to the 40 Key Issues set out at the beginning of the document and with the imperative to boost housing supply remaining as relevant now and into the future as it has been since the advent of the NPPF, an effective and deliverable focus on improving the supply of housing from within a transparent and effective plan-led system should be the priority for the new Local Plan.

If the public is to have confidence in the planning system, from both the perspective of its effectiveness as a tool that directs and manages growth and as a system that delivers as predicted, the Local Plan should be realistic and pragmatic in its aspirations recognising that for many aspects of development it is the market that delivers growth and therefore the conditions that the Local Plan seeks to create should encourage and support the growth that the market can and wishes to deliver.

The operating principle for the Local Plan should be delivery in the locations and at the levels that the Plan predicts; if there is realism and an absence of unnecessary regulatory controls that extend beyond national requirements there is a far greater likelihood that the Local Plan will achieve its overarching development objectives. In so doing there will be less propensity for unplanned/unexpected development to come forward, which will serve the public interest more effectively.

With reference to the overarching objectives that precede each topic area (Economy, Affordable Housing, Environment, Health and Well-Being, Delivery) there is nothing that is unduly controversial, however there should be clarity that the 'housing' topic is concerned with homes for all sectors of the population. As set out there is potential for some ambiguity insofar as some readers may perceive that the Council's concentration will be on the delivery of housing within

the Affordable sector, rather than across the market and social sectors. 'Homes for All' would be a better expression of intention.

Of the 40 identified objectives Crest is firmly in the belief that the following five represent the key areas for the emerging Local Plan:

- **12: *Ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development.***
- **10: *Working with neighbouring authorities to meet the needs of the housing market area as a whole.***
- **9: (Alternative wording) *Proactively meeting the District's identified housing needs in full recognising the needs of all sectors of the community with an emphasis on ensuring that supply is managed and delivered effectively from within a portfolio of allocated and contingency sites across the District.***
- **3: (Alternative wording) *Recognising and planning for the high level of daily commuting out of and into the District, particularly out-commuting to Bristol, Gloucester, Cheltenham and Swindon. The Local Plan strategy will acknowledge and plan positively for cross-boundary relationships in the interests of delivering sustainable development.***
- **4: *Working with other local authorities and statutory agencies to investigate transport improvements to link Stroud with Bristol, the Midlands and Wales (including enhancing and expanding existing sustainable transport opportunities)***

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?*

Response: The availability of development land adjacent to motorway junctions is a key consideration for modern industrial and logistics businesses and is a key attractor of inward investment. By allocating land adjacent to motorway junctions (12 and 13) there is potential, as part of the plan led process and through the focussed identification of infrastructure improvements at the junctions, to ensure that the capacity of the junctions is improved and upgraded to resolve existing bottlenecks and capacity problems.

Through positive allocations, and the identification of development criteria within the allocating policies, developers can be required to ensure that necessary junction/network improvements are made alongside the delivery of new premises. Proximity of development to the junctions would also help to mitigate the effects of heavy goods traffic and associated commercial traffic on the wider network, by concentrating the majority of vehicle movements on the strategic components of the highway.

In the alternative traffic will continue to use the motorway junctions as the main conduits to gaining access to employment land within the District, with less potential for focussed improvements to be delivered. The employment profile within Stroud District will continue to operate across sectors, with incubator and small-business premises within the start-up and creative sectors operating within the lower-grade premises available within the Valleys and elsewhere; the Plan should support and encourage such businesses. However there should also be an emphasis on delivering grade-A premises with excellent access to the strategic road network. Consideration could also be given, via an industrial policy within the Plan, to cross-subsidisation between sectors (greenfield/brownfield - via CIL) to help bring older premises back into use and to help create favourable conditions for new businesses to establish and grow.

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?*

Response: As indicated above the market will respond to particular conditions that prevail within any given housing market within the 'for-sale' sector. Home builders do not seek to build homes that the market cannot afford and in sectors that are not in demand, on this basis Crest do not consider that prescriptive intervention in the private market is appropriate.

For those unable to access the market it is recognised and accepted that prescription is appropriate according to need, and housing needs surveys should be used to inform and address such affordability considerations. Housing market information can be used in an informative capacity as part of the contextualising of the Local Plan to help guide developers as to the preponderance or otherwise of particular dwelling-types within the housing stock. However it is not considered that prescription regarding mix is acceptable or reasonable.

It is important to recognise that during the plan-period economic conditions are likely to change and demand for dwelling-types will shift and adapt as new homes are delivered. It would therefore be inappropriate to enshrine within policy a particular requirement for dwelling-types based on an evidence base that could become outdated during the life of the policy itself. The market should be allowed to move and adapt to demand as conditions change across the Plan period without unnecessary encumbrance.

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

Response: Having regard to the four options presented it is somewhat difficult to prescribe with any certainty which approach (or combination should be pursued) until there is clarity regarding the scale of housing delivery that will be required over the new Plan period. However, there are a number of operating principles, based on experience across recent Local Plan periods and strategies that suggest a combination of the options is likely to be the best approach.

Dealing with Option 4 first, it is well-documented that new settlements or significant scale urban/settlement expansions often take a considerable period of time to deliver, and while they offer the potential to create new places that embrace new ways of living the gestation period is long and often uneven in delivery; insofar as the infrastructure, employment and public spaces etc. are rarely delivered early in the development trajectory. Site establishment can be complicated and the infrastructure bill heavy, such that new settlements are a long-term commitment, which are often most appropriately considered where the scale of need relates to a wider region or sub-region. Crest do not consider, in the circumstances in Stroud as currently understood, that this option is credible.

Similarly Option 3, which considers complete dispersal is unrealistic on the basis that demand will be far greater closer to centres of population and employment; small settlements are rarely if ever self-sustaining and therefore dispersal of growth will add to greater use of private vehicles, more travel movements and less strategic scale infrastructure being delivered. Similarly existing facilities within villages which may currently be under threat are rarely sustained by small-scale developments. The Plan should be supportive of some growth within villages, but this should not provide the mainstay of the residential development strategy.

An amalgam of Options 1 and 2 therefore represents the most realistic approach to growth within the District. The key settlements of Stroud, Cam/Dursley and Stonehouse should be the focus for growth, but there should be recognition that current growth at Stonehouse will take time to deliver; the likelihood being that the site will continue to deliver housing well into the new Plan period. It is unlikely therefore to be appropriate to allocate a further significant swathe of development adjacent to Stonehouse in the expectation that it will deliver early on within the next period. Taking the examples provided by Hunts Grove and Littlecombe, both of these sites have taken longer to deliver than had been anticipated when first allocated and in the case of the Hunts Grove extension allocated within the current Plan the latest development trajectory

indicates this will start delivering only once the new plan period commences. Given the status of Stonehouse as a key settlement it should attract a commensurate level of growth according to its position within the development hierarchy, but this should reflect current commitments. Cam/Dursley should become a focus for growth in recognition of it being the only settlement in the District with a rail link to Bristol and on the basis that the current Plan allocation is significantly smaller than that which is underway at Stonehouse.

Experience within the District suggests that large-scale concentrations of housing take time to deliver and to market and therefore it would be more appropriate to consider a wider range of strategic, but smaller scale developments located across the higher tier settlements (1 and 2), with 'modest' levels of development planned within tier 3 settlements. Elsewhere within the hierarchy limited development should be brought forward commensurate with achieving sustainable development appropriate to the context. A range of strategic scale developments of c.500-750 dwellings could be considered within the main settlements as the 'backbone' of the housing strategy.

A potential additional factor to be added arises in respect of potential future duty to cooperate collaborations with the JCS authorities to the north of the District and with the JSP West of England authorities to the south. If it becomes apparent through the immediate review of the JCS and through the JSP process during 2018 that there is pressure upon Stroud to help accommodate unmet needs arising in Gloucester and South Gloucestershire positive consideration should be given to responding via allocations within the emerging Local Plan. Where needs extend across boundaries and relate to a wider housing market area the potential to plan larger-scale settlement expansion increases and should be catered for as appropriate, with an emphasis on delivering in locations that could be well-served by strategic sustainable transport links.

Question 3.2a – Gloucester's Fringe: *We welcome views on whether the following broad locations should be considered for development, if needed, or whether there are better sites in Stroud District or in neighbouring areas that should be assessed:*

- G1 – South of Hardwicke*
- G2 – Whaddon*
- G3 – South west Brockworth*
- G4 – South of M5/J12 (employment)*

Response: Crest has no specific points to make as to the suitability or otherwise of these options at the Gloucester Fringe other than to highlight that none of the options identified should be considered in a manner that in any way compromises or impedes the delivery of the committed development(s) at Hunts Grove, which have been a fixture within the Local Plan since 2005. Priority should be given through the plan-making process to ensuring that Hunts Grove and the proposed 750 dwelling extension can be delivered in accordance with the current permission and the allocation.

It is also considered that the Hunts Grove allocation represents the last suitable strategic allocation to meet Stroud's needs at the Gloucester Fringe, as it was a product originally of a development strategy within the County Structure Plan that prioritised growth at the Principal Urban Area (PUA). Any further growth in this location should focus on unmet needs from the JCS area, or on delivering an employment strategy that seeks to maximise the potential of land adjacent to the strategic highway network (see comments above).

Question 3.3a: *We welcome views on whether there are opportunities to improve transport links between areas within Stroud District and South Gloucestershire, Bristol and beyond; or to provide new local services; and what development within the District might be appropriate to deliver these?*

Response: As noted above, and as is acknowledged within the key objectives, there is a strong functional relationship between the District and the Bristol conurbation to the south, as well as to Gloucester/Cheltenham to the north. While previous Local Plan strategies have sought to address this relationship by encouraging employment growth with the objective of achieving greater self-containment this approach is unlikely to succeed, particularly given the size of Bristol as an employment-attractor and its regional significance.

The Local Plan strategy should acknowledge and work with such exogenous factors recognising that it is more pragmatic to encourage sustainable linkages with adjoining major centres rather than by trying to compete with them. In this regard the Plan should focus growth around sustainable transport links and encourage the expansion/improvement of such facilities by working proactively with the relevant authorities. With this in mind a central objective within the Plan should be the expansion of Cam as a sustainable location for development, with the improvement/upgrading of Cam/Dursley station as a priority objective within the Local Plan.

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

Response: The use of settlement boundaries is a long-established and transparent policy tool which provides sufficient certainty and clarity for residents and developers alike as to where development is acceptable in principle and where it is not. However for such boundaries to have substance and meaning within a plan-led system the boundaries must be up to date and must reflect the local planning authority's view as to the delineation of an appropriate development limit. Critical in this regard is the exercise of surveying and establishing realistic, defensible and appropriate settlement limits that can prevail for the life of the plan-period. In this regard the boundaries should be updated to reflect future development opportunities and locations where development will be acceptable over the whole of the plan-period.

Having regard to the options that are presented the only realistic course of action (if boundaries are to be continued with) is to ensure that the boundaries are reviewed as soon as the strategy and development requirements are established and to delineate accordingly, taking in all of the land that is either to be allocated, or on which development would be acceptable in principle, during the plan-period. Such an approach would provide the necessary level of certainty to ensure that there is confidence in the planning process.

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

Response: See above, for the principle of the approach to be adopted and below, in respect of development locations.

Question 3.6: Broad settlement summaries

Cam and Dursley (Cam)

Response: The land identified at Cam which is broadly marked 'B' and which is shaded purple represents an appropriate development location (having regard to all of the comments outlined above) and should be brought forward as a potential allocation. The land identified 'B' and edged red has potential for inclusion, in part or in its entirety, as an allocation, although this should most appropriately be considered alongside the land adjoining to the west of the A4135 that runs down to the edge of the existing settlement boundary, which represents a more logical and legible development proposition. Furthermore the plan should consider the potential of all of the land south of the railway (the majority of which is already committed) as part of a comprehensive northern expansion of Cam, as part of which the station should be upgraded and improved.

The Gloucester Fringe (Hardwicke)

Response: See comments above in respect of further development options at Hardwicke.

I would be grateful for acknowledgement of safe receipt of comments on behalf of Crest and ask that you record Crest's ongoing interest in the Local Plan review process. With a long-established working relationship with the Council we look forward to engaging further as the consultation and evidence-gathering process continues.

Yours faithfully

