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Our Ref: BRS.18.9010

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Local Plan Review
The Planning Strategy Team
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Dear [REDACTED]

Re: Stroud District Local Plan Review – Emerging Strategy Paper consultation

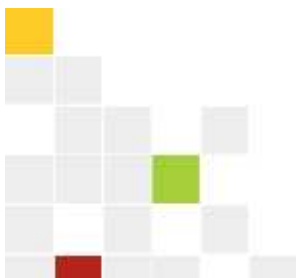
Executive Summary

On behalf of our client, [REDACTED] (herein referred to as the landowners), Boyer is instructed to submit representations in response to the Stroud Local Plan Review – Emerging Strategy Paper (November 2018) consultation (herein referred to as Local Plan Review). The representations provide commentary on the draft policy options and promote land north of Charfield Road, Kingswood for consideration as an allocation for residential development (Site Location Plan attached at **Appendix 1**).

Our comments are intended to be helpful to Stroud District Council in the production of the emerging plan, key points we seek to highlight are that:

- Stroud will need to plan positively in response to the strategic context and housing requirements in accordance with national policy and standard methodology, this includes allowing flexibility for contingency.
- A thorough assessment of suitable and deliverable sites should be carried out across all tiers of settlements within the existing Local Plan hierarchy. The hierarchy should not prevent sustainable development coming forward, where it would otherwise fulfil the objectives of the plan.
- Kingswood is unique in being a sustainable settlement with a number of services and amenities including a secondary school and furthermore within close proximity of Renishaw, a major employer, and Charfield, a settlement earmarked for significant expansion including improved transport provision with the reopening of the train station and other services and amenities.
- We promote land north of Charfield Road, Kingswood, which is capable of delivering circa 80 dwellings in the earlier stages of the plan period. The site represents a suitable and sustainable development opportunity that would support the objectives and vision of the emerging Local Plan and thus should be considered for allocation.

An analysis of the site is provided below. Following this, we provide a summary of the strategic context followed by our comments on the Local Plan Review.



Site Promotion – Land north of Charfield Road, Kingswood

On behalf of the landowners, land north of Charfield Road is promoted for consideration as an allocation in the emerging Local Plan Review. The land (identified in **Appendix 1**) is situated immediately north of Charfield Road, Kingswood. This land is promoted as a site that is available now, and being capable of achieving a deliverable and sustainable development as well as providing significant benefits for Kingswood. Its allocation would be supported by the objectives of the emerging Local Plan Review and would assist towards housing targets.

Site and Surroundings

The site subject to this appraisal comprises a greenfield site situated to the north west of the village of Kingswood. The site is located within the parish of Kingswood, in the district of Stroud, and lies outside the Settlement Development Limit of Kingswood village.

The site currently consists of open agricultural greenfield land, located to the north of Charfield Road. It is bounded by an industrial estate to the east, with agricultural land and a watercourse adjacent north of the site, beyond which lies the grounds of Katharine Lady Berkeley's School.

To the immediate west, the site abuts a small track leading to Merryford Farm located adjacent to the northern corner of the appraisal site. Residential dwellings are situated to the south east of the site, facing onto Charfield Road.

Adjacent east of the appraisal site is both a Key Employment Site of Abbey Mill Industrial Area, and the Settlement Development Limit of Kingswood.

The site is not subject to any landscape designations, and there are no tree preservation orders on or surrounding the site. The Cotswolds AONB boundary is approximately 850m north east of the appraisal site.

Whilst most of the site lies within Flood Zone 1, the north eastern part of the site lies within flood zones 2 and 3, associated with an adjacent watercourse, and therefore has a high probability of flooding at this edge of the site.

There are no listed buildings or scheduled ancient monuments on the site. Adjacent north east is the Grade II listed Langford Mill, and situated approximately 150m south east of the appraisal site is the boundary of Kingswood Conservation Area.

Kingswood

Kingswood is a sustainable settlement with a range of village amenities. Katharine Lady Berkeley's School and Sixth Form, which has 1470 students on roll, is located approximately 450m to the north east, whilst the boundary of a sports field associated with the school and Wotton Sports Centre lies approximately 190m north east of the site's northern boundary. From the site's south eastern boundary, Kingswood Primary School, which has a potential school population of 119 children, is situated approximately 300m east, a Shop and Post Office is located approximately 500m south east, and Kingswood Village Hall lies approximately 520m south.

A key employment site, Renishaw, which is a major engineering company, lies on the outskirts of Kingswood and is approximately 650m north west of the subject site. Charfield is located a short distance west of the site, approximately 1.6km, and is due for significant expansion including a train

station on the line which operates between Bristol and Gloucester. Furthermore, Junction 14 of the M5 motorway is approximately 6km west of the site and set to undergo major improvements over the next ten years to support growth at Charfield.

Transport Improvement

The site is located on an established bus route corridor and therefore discussions have been held with Stagecoach who currently operate the number 60 bus service which routes along Charfield Road. As a result of the proposed growth in South Gloucestershire and the potential sites that may be released within the Stroud District, Stagecoach have identified the opportunity to improve the frequency of the bus services between Wootton-under-Edge, Kingswood, Charfield and Thornbury/North Bristol Fringe. This improved bus service could be delivered in the short-term, which would directly enhance the sustainable credentials of the development site, providing future residents with the opportunity to travel to key local destinations without recourse to the private car. Residential development on land north of Charfield Road, Kingswood would directly align with the stated aspirations of Stagecoach and enhance the viability of the improved bus service.

Technical Assessments

Whilst the Council has previously considered and rejected this site in the 2011 SHLAA on the grounds of access constraints and in the 2017 SALA, which considered a larger site encompassing this site, on the grounds of landscape sensitivity, efforts have been undertaken to assess and overcome these constraints.

Therefore a project team has been assembled and initial technical assessments have been carried out which confirm the suitability and deliverability of the site. The technical work has assessed:

- Landscape; and
- Access

This work has included a review of the Plans' evidence base and concludes that there are no overriding constraints to the development of the site. It is estimated that the site can deliver approximately 80 dwellings in the short to medium term.

Summary

The site is available and initial technical investigations find that the site is suitable for residential development. The site is highly sustainable, being well connected to Kingswood and to benefit from improved sustainable transport services. The site could deliver circa 80 dwellings in the short to medium term and be catered for within the capacity of existing infrastructure. We would therefore encourage that the site is considered for allocation as it will contribute towards the objectives for growth at sustainable locations in Stroud and can be achieved in the earlier phases of the plan period. The allocation of the site is therefore considered to contribute towards the robustness of the emerging plan.

Strategic Context

The need for review

We welcome the review of the Stroud District Local Plan which was adopted in November 2015. The existing plan seeks to deliver at least 11,400 dwellings during the plan period 2006 – 2031 which equates to a delivery rate of 456 homes per year.

Paragraph 33 of the NPPF is of key relevance to Local Plan Review and states that:

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future”.

Standard Methodology

In this instance the Government requires the Local Plan Review for at least 638 new homes per year which is a 40% increase on the existing figure of 456 homes per year. In order to achieve this the Review needs to identify land for at least 12,800 new homes. This figure is a minimum requirement and as indicated in paragraph 33 of the NPPF, the targets are to be reviewed in the context of changing circumstances and relevant changes in national policy.

With this in mind, the Local Plan Review needs to adhere to the 2018 version of the NPPF. Paragraph 60, in respect of delivering a sufficient supply of homes, states that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.

It is noted that the numbers could be affected by the Government’s standard methodology. The current figures derived from the MCHLG standard approach are based on the 2016 Household Projections. However, the use of the 2016 household projections has seen a significant reduction in growth results is identified. In response, the Government has confirmed that it will consult on further changes to the standard method to account for the lower growth rates in order to implement its commitment to deliver 300,000 per year. Updates to the standard approach are yet to be finalised and therefore the implications of the standard methodology remain fluid. How, any future changes to the standard approach will translate into need for the Stroud area is yet to be determined.

The Woolpit Appeal Decision

Other changes in circumstances include the Woolpit Appeal Decision, an appeal for 49 dwellings, which was allowed. In respect of the issue of housing land supply, the Inspector found that the Council could not demonstrate a 5 year housing land supply as it relied on a

large proportion of outline planning permissions, some of which were defective and unlikely to be delivered within 5 years. The key conclusion from Woolpit is that the onus is on the LPA to provide clear evidence that the sites relied upon within the 5 year housing land supply calculations can start to provide housing completions within 5 years.

Therefore, precaution should be had when relying on allocations and outline permissions as there is not a realistic prospect that housing will be delivered on the site within five years. This is relevant to the Local Plan Review as the consultation document indicates that of the 12,800 new homes required, 7,100 have received permission or are already identified in the current Local Plan, therefore leaving an additional 5,700 homes to be identified. In light of Woolpit, the assumption that 7,100 dwellings are committed will need to be demonstrated with robust evidence.

Charfield Strategic Development Location

Charfield is within the neighbouring authority of South Gloucestershire but is within close proximity to Kingswood, with less than 2km separating them. As part of the West of England Joint Spatial Plan, which is being prepared by South Gloucestershire in cooperation with Bristol City, North Somerset and Bath and North East Somerset Councils, Charfield is identified as a Strategic Development Location (SDL) and is earmarked for significant growth. This is due to comprise of 60-70ha of interdependent development areas around the village, providing 1,200 new dwellings, including affordable housing; replacement of the primary school with a 3FE school; new and improved retail and community facilities; 5ha of employment land; and a strategic transport package. In addition, the SDL will introduce a green infrastructure network to mitigate land-based impact and reinforce the local sewerage network and treatment works.

The Strategic transport package referred to is to include: M5 J14 improvements, Charfield rail station re-opening, local bus services, Wotton Road environmental enhancement scheme, new and improved foot and cycle connections to key local destinations, including Wotton-under-edge. From discussions with Stagecoach we understand that bus services are likely to improve, including the number 60 bus service which runs adjacent to the site, along Charfield Road.

This significant growth within such close proximity to the administrative boundary is of relevance and importance to the Local Plan Review as it alters the context of Kingswood/ the wider 'Wooton Cluster'. The transport improvements proposed as part of the Charfield SDL along with boost in employment land and other retail and community facilities will be beneficial to Kingswood and will further improve the sustainability of the local area.

Summary

In reviewing the local plan the housing figures should be based on the latest context of national policy guidance, notable appeal decisions and key changes in the locality.

The Council's calculation of 638 dwellings per annum is in accordance with a national methodology based on the 2014 household projections and 2017 affordability ratio. This figure is a minimum and starting point for the Local Plan Review. In finalising housing targets for the plan period the review must be robust in testing the deliverability of existing commitments and take in to account the context of national policy, including ambitions to support economic growth and meeting unmet housing need.

The housing figure is therefore likely to benefit from a further increase to improve the robustness of the plan and to accord with the Government's objective of significantly boosting the supply of homes.

Comments on Local Plans Review – Emerging Strategy Paper Consultation:

Overall, and subject to the comments set out above, we support the review of the Local Plan as it seeks to boost housing supply by 40% for at least 638 new homes per year. This is the starting position and may require further increase in accordance with strategic context discussed above.

We agree with the Council's vision and objections, particularly in improving accessibility to affordable and decent housing for local needs. Provision of housing will support the network of settlements in the district, which the vision recognises as being well connected to their rural hinterlands and complementary to the role of wider regional centres.

The key consideration for the plan review is how additional growth will be delivered and our comments are aimed to be helpful in improving the delivery of the plan. The purpose of these representations is to promote the subject site at Kingswood as a sustainable option for housing allocation that can further improve the robustness and flexibility of the plan. The comments below are in response to specific questions raised in the consultation.

Key issues

Question 1.0a have we identified the top 5 issues for you?

We are in support the principle of the key issues identified, in summary (as abbreviated):

1. New housing in the right place
2. Conserving and enhancing the countryside and biodiversity
3. Maximising the potential of brownfield and underused sites.
4. Reduce and mitigate the indirect impacts of development on the natural environment.
5. Tackling the acute lack of affordable housing.

In response to the key issues, we would suggest that the first issue and priority is to ensure that housing supply is sufficient in meeting the full need for new homes including with a contingency for flexibility and non-delivery. From this position the Council can distribute growth in the right places on sites that are sustainable and that can be delivered within the plan period.

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

Whilst we support the principle of the key issues identified and the suggested responses to the issues, we would advise caution on an approach which is over reliant on brownfield land. It is generally accepted that such sites may often be subject to viability and deliverability issues and, therefore, there is a need to ensure that opportunities for appropriate and deliverable greenfield sites are fully and objectively assessed. Furthermore, in terms of location, each site should be considered on its merits and not automatically discounted based on an established hierarchy of settlements.

Specifically, the subject site at Kingswood should be considered as a sustainable housing allocation option. It is well located within close proximity of key services including an employment area and a

secondary school, in addition to being well placed to benefit from the expansion of Charfield as an SDL and associated transport improvements. It is a greenfield site being promoted by a national house builder and as such can be delivered within the early stages of the plan period.

A local need for housing

Question 2.3a Do you agree with the ways in which the emerging Strategy intends to meet local housing need?

At least 638 dwellings per annum over 20 years

Paragraph 60 of the NPPF states that the determination of the minimum number of homes needed should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach.

It is noted that the numbers could be affected by the Government's standard methodology which is yet to be finalised and therefore the implications of the standard methodology remain fluid. How, any future changes to the standard approach will translate into need for the Stroud area is yet to be determined.

The current figures indicated (638 dwellings per annum) is mathematically correct based on existing guidance and data available, however, this is only the starting point. The review of the plan should positively embrace opportunities to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere which are additional to the local housing need figure. The 638 dwellings per annum figure must therefore be considered as a minima.

A variety of brownfield and greenfield sites

The inclusion of greenfield sites is fundamental to delivery and as such suitable greenfield sites will need to be included for the plan to be flexible and robust. Brownfield sites can often be affected by deliverability and viability constraints.

In accordance with paragraph 23 of the NPPF the strategic policies of the plan should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities. Nevertheless, the Local Plan Review should identify a sufficient supply and mix of housing sites after taking into account availability, suitability and economic viability and therefore the inclusion of greenfield sites is key.

Greenfield sites, including the subject site at Kingswood, which are suitable, available and deliverable within the earlier stages of the plan should be included for robustness. For the Council to maximize housing delivery the widest possible range of sites by size and market location is required so that small local, medium regional and large national house building companies have access to suitable land in order to offer the widest possible range of products.

A proportion of affordable housing on sites of 10 or more dwellings and 5 or more dwellings in Designated Rural Areas

The principle of delivering affordable housing is supported, however, in setting specific thresholds viability will need to be taken in to account. In accordance with paragraph 34 of the NPPF the level and type of affordable housing provision required should be set out together with any other

necessary infrastructure, however such policy requirements should not undermine the deliverability of the plan.

In accordance with paragraph 57 of the NPPF every effort should be made to take in to account viability at plan making stage, i.e. cumulative burden of policy requirements should be set so that most sites are deliverable without further viability assessment negotiations. That said, viability is highly sensitive to changes in inputs and an opportunity should exist for further viability assessment at application stage if required.

Minimum dwelling sizes

Many new build properties are already built to or are in exceedance of national space standards. Should Stroud wish to introduce the standards formally through local planning policy, this will need to be justified in accordance with national policy and guidance.

The Government's Written Ministerial Statement dated 25th March 2015 stated that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance". Furthermore, the NPPG (ID: 56-020-20150327) sets out that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing.

A mix of dwelling types

We support the principle for a varied mix of dwelling types to be provided over the plan period. To be flexible, the Local Plan Review should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations rather than setting a specific housing mix on individual sites.

Paragraphs 61 and 62 NPPF sets out that housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing. The dwelling types sought through policy should be underpinned by up to date evidence in accordance with paragraph 31 of the NPPF.

Flexible accommodation to "lifetime home" standards

Should the Council wish to adopt the higher optional technical standards for accessible and adaptable homes as policy requirement, then this should only be done in accordance with national policy and guidance.

Self and custom build housing

Self and custom build housing should be supported for its potential additional contribution to housing supply. The allocation of sites for self and custom build housing is supported. The Council should also consider a rural exceptions policy approach for self and custom build housing. We would advise caution that self-build may have practical and delivery implications when mixed within larger 'standard' housing schemes. Self-build schemes would therefore be better managed on self-build only plots. Any policy for self-build plots should be fully justified and supported by evidence of need and genuine demand from people wishing to build their own homes.

Question 2.3b Do you support an alternative approach? Or have we missed anything?

In forming the emerging strategy for housing the starting point is a detailed review of the number of homes required. This should take in to account the government's standard methodology as it emerges and should also consider the deliverability of current commitment. The figure should also include for contingency to allow for flexibility.

The consultation document suggests that the review needs to identify land for at least 12,800 new homes and claims 7,100 of which are current commitments leaving the need to identify land for a further 5,700. Therefore as a starting point, a thorough review of the 7,100 dwelling commitment is required to understand when those dwellings will be delivered, if at all. The review will also need to gather an understanding of all land available and deliverable within the district to be able to assess the most suitable and sustainable options that can be delivered, including those that can be delivered in the first 5 years of the plan.

The subject site at Kingswood is a sustainable option to consider, which is without significant constraint and, with control by a national housebuilder can be delivered relatively early within the plan period.

The emerging growth strategy

Question 4.2a Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

The emerging strategy concentrates housing growth for 12,800 dwellings in the main towns of Cam, Dursley, Stonehouse & Stroud and 2 new settlements at Sharpness & Wisloe. There is also modest growth at Berleley, Minchinhampton, Nailsworth & Painswick and lesser growth at Brimscombe, King Stanley, Kingswood, Leonard Stanley, North Woodchester & Thrupp. It is important that the emerging growth strategy and proposed distribution of housing meets the housing needs of both urban and rural communities.

Whilst the emerging strategy seems logical in terms of distribution across a hierarchy of settlements, it is a rigid approach that exists in the current plan. To allow for flexibility there must be a full review of available and deliverable sites across all settlements.

Kingswood is unique in its context, amongst its services is a secondary school and a major employer, Renishaw, located on the north west periphery. It would appear that other settlements within the same tier of the hierarchy (3) do not benefit from such services. Also of key relevance is the growth of Charfield in neighbouring South Gloucestershire. Charfield is set for significant expansion and its proposed transport improvements will be to the benefit of Kingswood. The site north of Charfield Road could also benefit from an opportunity for an improved number 60 bus service along Charfield Road.

At present, Kingswood is a tier 3 settlement and accordingly identified for lesser levels of growth. The consultation documents suggests limited development at small and medium sized sites adjoining settlement development limits at Tier 1 – 3 settlements, and defines this as being up to 20 dwellings. We question the need for a cap at 20, which appears to be totally arbitrary, and suggest that each site should instead be assessed on merits. For instance a single sustainable development may deliver 50-100 dwellings akin the subject site, and be more suitable than two or three sites delivering up to 20 dwellings each. Likewise, more substantial sites may be able

to deliver in a more comprehensive manner acknowledged benefits to the existing community.

Question 4.2b Do you support an alternative strategy approach?

We would not suggest the radical review of the emerging strategy, rather we would suggest that the strategy should be more flexible with due consideration of all available and deliverable sites. Following a thorough review of available land, the most sustainable sites should be selected on their merits to determine where growth is best placed.

Question 4.2c Have we identified the right towns and villages for growth? Or do other settlements have growth potential?

As mentioned above, flexibility should be applied to the hierarchy approach. A thorough review is required of all available and deliverable land. A settlement's position in the hierarchy should not undermine the delivery of sustainable development when in compliance with the wider objectives of the plan and when considering proposals based on their own merits.

Question 4.2d Do you support our approach to addressing Gloucester's housing needs?

We agree that the Local Plan Review should be addressing Gloucester's housing needs in accordance with paragraph 35a of the NPPF where plans should be positively prepared and provide a strategy which as a minimum seeks to meet local housing needs and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated. To fully meet the legal requirements of the Duty to Co-operate Stroud District Council should engage on a constructive, active and on-going basis with neighbouring authorities to maximise the effectiveness of plan making. This should include meeting the unmet needs of Gloucester.

Question 4.2e Do you support an alternative approach to addressing Gloucester's housing needs?

In addition to Gloucester, and as a Duty to Co-operate, Stroud should be working with other neighbouring authorities to address unmet needs. In particular, neighbouring South Gloucestershire are preparing for significant growth as part of a JSP, which includes meeting the needs of Bristol. Accordingly, Charfield is identified as a SDL and sits within close proximity of Stroud's administrative boundary. The Local Plan Review should therefore be accommodating to the context of Charfield to ensure growth is coordinated and that the benefits of improvements in transport services and other amenities at Charfield can be utilised by residents in Stroud District as well.

Settlement hierarchy

Question 4.3a are any of the settlements in the wrong tier and, if so, for what reason?

We would suggest a detailed review of the settlement hierarchy. In addition, flexibility should be applied so that position in the hierarchy does not automatically dictate the control of development and prevent the delivery of sustainable development when in compliance with the wider objectives of the plan.

With specific reference to Kingswood, the consultation document has the settlement positioned at 3a in the hierarchy. The evidence base that has informed the hierarchy is the 'Role and Function Study' – the 2014 version is available, however the 2018 version referred to was not available at the time of consultation and we reserve the right to comment on this document when it becomes available.

Kingswood is a unique settlement in the fact that in addition to the services and amenities it holds in the village centre there is a secondary school north east of the village centre and a major employer located north west of the settlement. The 2014 version of the 'Role and Function Study' has not appeared to have taken these factors in to account. Furthermore, Kingswood is within close proximity of Charfield, which as part of planned expansion, will benefit from improved transport measures including a train station with services to Bristol/Gloucester. There is also opportunity for improved bus services along Charfield Road. The sustainability of Kingswood will be boosted therefore as a result of Charfield SDL and improved transport services.

Accordingly, the position of Kingswood and future growth of the settlement needs to be considered within this context.

Question 4.3b Do you support the proposed approach to managing development at small Tier 4 and 5 settlements by including them within the hierarchy and defining Settlement Development Limits? Or do you support an alternative approach to simply treating them as 'open countryside'? What are the pros and cons of either approach?

As previously mentioned, we would suggest that sites are assessed on a case by case basis across the entire hierarchy, this would help to understand what sites are available and deliverable before deciding where sustainable growth can be achieved.

Question 4.3c Do you support the idea that the Local Plan should seek to manage cumulative impacts of growth on individual settlements? How should we develop a policy framework to achieve this?

We support the principle of managing cumulative impacts, be it through improving infrastructure and other mechanisms. We reserve the right to comment on any policy approach to this as it advances.

Settlement boundaries

Question 4.4a do you support the emerging Strategy's approach towards maintaining settlement development limits?

Settlement development limits should be reviewed to provide enough opportunities to meet identified housing needs in full. We support the most popular option (option 2) which seeks to assess proposals on a case by case basis.

In reviewing Kingswood settlement boundary, special regard should be given to the unique position of the settlement and its sustainability. The settlement boundary should not restrain sustainable growth that supports existing services and facilities in Kingswood.

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

The proposal to allow development beyond settlement development limits is supported which provides a degree of flexibility to the housing land supply. It is important to consider sustainable development opportunities that can be delivered and contribute to the wider objectives of the plan. Our clients land is a site that is currently available and deliverable and is one such example of how this policy approach would be beneficial to the delivery of sustainable development.

Making Places

Question 5.0a do you support the proposed mini-visions for you area(s)?

With specific reference to the 'Wotton Cluster' which includes Kingswood, we do not agree with the mini-version as currently worded. For clarity the mini-vision states:

“...Improving access to jobs, services and facilities in the south of the District, to boost local sustainability and community vitality”

There is no mention of housing within the vision and the wording should be amended accordingly.

Question 5.0b would you like to propose any alternative wording for any of the mini-visions?

The wording of the 'Wotton Cluster' mini-vision should be amended to include reference to boosting housing supply and delivering new homes, including affordable homes in response to local need.

Question 5.0c Do you support the identified key issues and priorities for action for your area(s)?

One of the key issues and priorities for the Wotton cluster is 'ensuring adequate provision of affordable housing and opportunities for downsizing for local people'. This does not go far enough in encouraging delivery of new homes across a range and mix of housing types. Delivery of a wide mix of housing in the area, including market and affordable, will contribute towards sustainable development, supporting existing communities.

Question 5.0d are there other important issues and priorities you would like to highlight?

Page 88 of the consultation document includes potential sites for development in Kingswood, in red, and alternative sites in blue. Our client's land is one of the sites in blue, reference number KIN008. The site subject to promotion through the Local Plan Review is lesser in extent and is considered to be well contained and connected to Kingswood, as well as being within close proximity of the secondary school and Renishaw. Please refer to the amended boundary in Appendix 1.

Our client's site is available and the landowner is in advanced discussions with a national housebuilder, accordingly it is understood that the housebuilder will take the site forward and can deliver within the early stages of the plan. The site offers a sustainable development opportunity that can further contribute to the flexibility and robustness of the plan.

Background Studies

Question 6.1. Are there any other specific local studies that you believe are needed to inform the LPR?

The NPPF is clear in that housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned. The housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including the need for affordable housing.

We reserve the right to comment on the studies that make up the evidence base and inform the LPR. We especially seek to review the 2018 version of the Settlement Role and Function Study, which is referred to in the consultation document and has influenced the settlement hierarchy,

however, the document was not available at the time of consultation.

Conclusion

We are grateful for the opportunity to comment on the Local Plan Review and hope that our comments are helpful and informative to the preparation of the plan. Overall we support the vision and objectives for the plan in supporting additional growth in the district over a 20 year period.

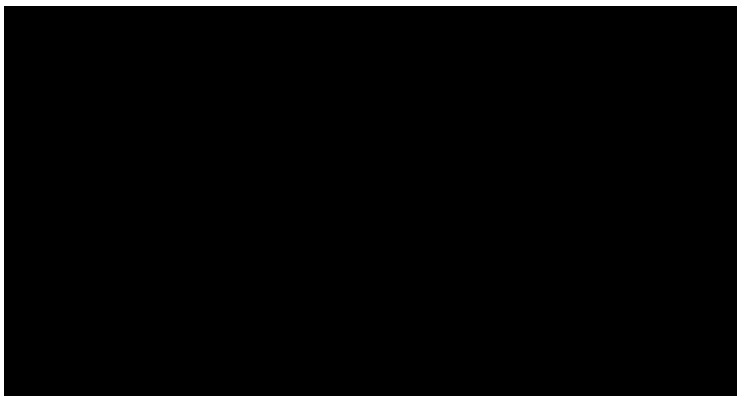
The Council needs to incorporate significant housing growth to accommodate a 40% increase in housing delivery from at least 456 dwellings per year to at least 638 dwellings per year (a figure that may alter based on government methodology between now and adoption). These figures represent a minimum and are, if anything, likely to increase. Therefore, to ensure flexibility, it is important for Stroud to be thorough at this stage in considering all options available that can realistically be achieved in the plan period, including consideration of our client's site.

The targets for the plan period are a minimum and accordingly the Council will need to consider sustainable sites including those which are greenfield and at all settlements across the hierarchy.

Our representations, on behalf of the landowners, promote land north of Charfield Road, Kingswood, as a suitable site for allocation in the emerging Local Plan. A project team has been assembled and initial technical appraisals have been undertaken, the conclusions of which support the site as being suitable for allocation for residential development. The site is sustainably located, being well connected to Kingswood as well as Renishaw employment use and Charfield, which is due for significant growth and improved services including transport links. The site is available, suitable for development and can be delivered within the early stages of the plan period.

Thank you for the opportunity to comment. We hope that the promotion of the north of Charfield Road, Kingswood is helpful in providing additional options for Stroud to consider. We look forward to the opportunity to cooperate with officers as the plan advances.

Yours sincerely,



Appendix 1