

Stroud District Local Plan Review  
**Emerging Strategy 2018**



**January 2019**

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# **1 INTRODUCTION**

## **1.1 Background**

- 1.1.1 These representations are made by Gladman Developments Ltd. (hereafter referred to as “Gladman”). Gladman specialises in the promotion of strategic land for residential development with associated community infrastructure.
- 1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.
- 1.1.3 Gladman has been involved in contributing to the plan preparation process across England through the submission of written representations and participation at local plan public examinations. It is on the basis of that experience that these representations have been prepared.

## **1.2 Structure of Representations**

- 1.2.1 These representations are structured to follow the consultation document and will cover, but is not limited to the following key topic areas:
- National Policy & Guidance
  - Legal Compliance
  - Duty to Cooperate
  - Local Economy
  - Housing Need
  - Vision
  - Distribution of Growth
  - Site Submission

## 2 NATIONAL PLANNING POLICY AND GUIDANCE

### 2.1 National Planning Policy Framework

2.1.1 On 24<sup>th</sup> July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework. This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

2.1.2 The NPPF18 introduces a number of major changes to national policy and provides clarification on how specific elements of the Revised Framework are expected to be implemented. These include the identification of housing need using the standard methodology and housing requirement, the Duty-to-Cooperate and other specific policies.

2.1.3 The NPPF18 also reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the future of each area to address housing needs, economic, social and environmental priorities to help shape future local communities. In particular, paragraph 16 of the Framework states that Plans should:

- a) Be prepared with the objective of contributing to the achievement of sustainable development;
- b) Be prepared positively, in a way that is aspirational but deliverable;
- c) Be shaped early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) Contain policies that are clearly written and unambiguous, so it is evidence how a decision maker should react to development proposals;
- e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

2.1.4 The NPPF18 has also made clear that local plans that are in preparation will need to move towards the use of the new standardised methodology for calculating housing needs, unless the plan is submitted for examination before 24th January 2019, in which case it will be tested against the previous Framework.



- 2.1.5 Notwithstanding the above, it is important to note that whilst the standardised methodology to identify housing needs has been introduced, it is likely that this will be subject to further change. In this regard, it is currently anticipated that the standard method will be adjusted to ensure that the starting point in the plan-making process is consistent with the Government's proposals in Planning for the Right Homes in the Right Places consultation, to ensure that 300,000 homes are built per annum by the mid-2020s. This follows the release of the 2016-based Household Projections in September 2018, which forecast a lower level of household growth than previously envisaged. It is therefore important that future iterations of the Local Plan take account of any changes to the standard method for calculating housing needs during the course of its preparation.
- 2.1.6 Once a local planning authority has identified its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided, where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.
- 2.1.7 To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the Revised Framework. Paragraph 35 states:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

## Planning Practice Guidance

- 2.1.8 The Government published updates to the Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing local plans. In particular, the

updated Housing Needs Assessment chapter PPG confirms that the Revised Framework expects local planning authorities to follow the standard method for assessing local housing needs, and that this identifies a minimum housing need figure and not the final housing requirement.

- 2.1.9 The calculation of objectively assessed needs (OAN) for housing has been a subject of much debate as part of Local Plan examinations and s.78 appeals since its initial introduction through the Framework in 2012 with interested parties grappling with the issue of OAN with varying outcomes depending on local circumstances. To simplify the assessment, the Government, through the NPPF18, has introduced the standardised method which should be undertaken through the 3-stage process outlined at paragraph 005 of the PPG.
- 2.1.10 Whilst the PPG advises that the standard method is not mandatory, there is an expectation that other methods will be used only in exceptional circumstances based on robust evidence in order to deviate from the standard method. In the event that an alternative approach is used it should only be considered sound if it exceeds the minimum starting point. The PPG is clear that any alternative approach, which results in a lower housing need figure than the standard method, should be considered unsound as it does not meet the minimum housing need required.

## **3 LEGAL COMPLIANCE**

### **3.1 Duty to Cooperate**

- 3.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 3.1.2 Whilst Gladman recognises that the Duty to Cooperate is a process of ongoing engagement and collaboration<sup>1</sup> as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues. This is not simply an issue of consultation but a question of effective cooperation.
- 3.1.3 The need to positively plan to meet full housing needs across a HMA should not be underestimated. Whilst it is all too easy for the DtC to be seen as an administrative exercise, there is a fundamental social and economic need to ensure a supply of good quality housing to meet the housing and employment requirements across the wider area is a key issue that must be addressed properly through the plan making process.

### **3.2 Sustainability Appraisal**

- 3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in local plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 3.2.2 The Stroud Local Plan Review should ensure that the results of the SA process clearly justify its policy choices, including the proposed site allocations and the approach taken to new growth when judged against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options

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<sup>1</sup> PPG Reference ID. 9-011-2014036

have been progressed and others have been rejected. The Council's decision making, and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.

## **4 LOCAL PLAN REVIEW – EMERGING STRATEGY CONSULTATION**

### **4.1 Context**

4.1.1 This section of the representations are made in response to the policy options currently being promoted by the Stroud District Council in the Emerging Strategy Consultation.

4.1.2 We invite the Council to consider the land at Charfield Road, Kingswood and Summer Street, Stroud for potential residential allocation.

#### **Question 2.1a – Do you agree with the ways in which the emerging Strategy intends to support the local economy and creation of jobs?**

4.1.3 It is vital that the Local Plan Review (LPR) contains policies that positively and proactively encourage the scale of development that is required to support sustainable economic growth and in doing so help contribute towards building a strong, competitive economy, both locally and nationally.

4.1.4 A clear economic vision and strategy should be put in place. This should reflect local business needs and be responsive to any wider opportunities that will allow the area to build on its strengths, counter any weaknesses and address future challenges. The policies of the local plan should match the economic strategy for the area and include policies that encourage the local and inward investment that is required to meet anticipated needs over the plan period. Furthermore, it is vital that local policies are responsive to changing circumstances and that they are suitably flexible to ensure that sufficient land of the right type is made available and that the planning system does not act as an impediment to sustainable growth.

4.1.5 National policy indicates that significant weight should be placed on the need to support economic growth and productivity through the planning system. This should therefore be reflected within the drafting of local policies to ensure that development plans are fully responsive to economic development needs, including those that have not been anticipated within the Plan. It is therefore essential that any policies that relate to the protection of the countryside provide sufficient flexibility to support proposals for economic development where they make a demonstrable contribution towards the sustainable development of the area.

4.1.6 We do however suggest that it is also appropriate that the LPR recognises that there may be instances where it can be demonstrated, that as a result of market conditions, a site or site(s) are unlikely to come forward for employment use, and it may be appropriate for other uses including residential development to be accommodated on such sites. We suggest that the

Council consider appropriate triggers for such mechanisms within any employment-based policies.

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

- 4.1.7 Gladman notes that the Council, in line with the government's standard methodology, are aiming to deliver at least 638 new homes per year for a 20-year period.
- 4.1.8 NPPF18 at paragraph 60 states that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using that standard method in national planning guidance"*. The use of the phrase 'exceptional circumstances' is deliberate by government and designed to set a high bar for local authorities seeking to diverge from using the Standard Methodology.
- 4.1.9 This methodology, however, should be seen as only a minimum starting point, and the Council should seriously consider providing for a greater scale of growth across the plan area, which could include utilising housing policies that can flex according to market conditions.
- 4.1.10 The standard method is only intended to identify the baseline requirement and it is important to ensure that actual housing need is not under-estimated as consideration should also be given to economic growth, affordable housing delivery and any unmet needs arising from neighbouring authorities to be determined through a SoCG.
- 4.1.11 Furthermore, it is important to note that the standard method may require further adjustments to ensure that the starting point in the plan making process is consistent with the Government's commitment to building 300,0000 new homes per annum by the mid-2020s.
- 4.1.12 In allocating sites, the Council should be mindful that to give itself a suitable baseline on which to maintain housing land supply, the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets across a wide range of local markets. The maximum delivery is achieved not just because there are more sales outlets, but because the widest possible range of products and locations are available to meet the widest possible range of demand.
- 4.1.13 Further, in respect of meeting the needs of the local population, Gladman refers to Paragraph 61 of the NPPF18 which states that;

*"Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies"*.

- 4.1.14 It is essential that any such housing policies are underpinned by relevant and up to date evidence, which supports and justifies the policies concerned as required by Paragraph 31 of the NPPF18. The evidence produced by the Council should recognise that market signals are important in determining the mix of housing needed and Gladman supports the inclusion of sufficient flexibility within any policies, avoiding instances where a prescriptive housing mix potentially compromises a sites viability.
- 4.1.15 All households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwelling types to meet people’s housing needs, the focus should ensure that appropriate sites are allocated to meet the needs of specifically identified groups of households such as families, older people and self / custom build.
- 4.1.16 The LPR 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.

**Question 3.1a - Do you agree with the vision for 2040 as drafted?**

- 4.1.17 In general, Gladman supports the proposed vision for Stroud District in 2040. It is key that this positive vision remains within the Local Plan Review and that it seeks to provide for economic growth and housing to meet the full needs of the District. Alongside this, it is fundamental that the associated infrastructure is planned for and delivered at the appropriate time.

**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?**

- 4.1.18 In line with requirements set out at Paragraph 17 of the NPPF18, the LPR should include strategic policies which address the Council’s identified strategic priorities for the development and use of land across the plan area. The Council should further refer to Paragraph 20 of the Framework which states that these strategic policies should identify an overall strategy for the pattern, scale and quantity of development.
- 4.1.19 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.
- 4.1.20 Paragraphs 77 and 78 of the Framework 2018 seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential therefore, that

the needs of the rural settlements across the district are assessed and a meaningful level of growth apportioned to them to ensure their ongoing sustainability, vitality and viability. This will help to preserve and enhance rural services and facilities and allow local rural communities to meet their own needs for housing whilst providing much needed affordable housing in the parts of the district that suffer with the greatest affordable housing need. In line with this CLA<sup>2</sup> in their Policy Briefing titled 'Sustainable Villages -Making Rural Communities Fit for the Future', conclude that '*unsustainable villages are not allocating housing and have very limited development options to improve their sustainability, leaving them in a cycle of decline*'. It is therefore essential that the Council recognise the pitfalls associated with limiting or preventing sustainable development opportunities in rural locations and take note of the growing wealth of evidence available exploring the wider issues of rural sustainability.

- 4.1.21 It is important to consider existing services and facilities in a settlement when assessing their suitability for accommodating new development. However, there must also be recognition that new development can often improve services and facilities, particularly access to public transport. Whenever considering a settlement hierarchy, policies makers should not limit themselves to a simple audit of existing services and should consider more widely how new development could improve existing services and facilities through increased local support or create new opportunities that would be of benefit to existing and new residents.
- 4.1.22 We note in the supporting text at 4.2, that it states "*some limited development at small and medium sized sites (up to 20 dwellings) immediately adjoining settlement development limits at Tier 1-3 settlements will be allowed, to meet specific identified local development needs*".
- 4.1.23 As far as Gladman can see there is no evidence to suggest why it is considered appropriate to limit sustainable development opportunities, adjacent to the settlement development limits, to no more than 20 houses. In restricting development to this maximum level, the Plan is not conforming to the positive approach of the Framework 2018 which states at paragraph 11a that "*plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change*". We suggest that the Council should seek to ensure that any policies within the LPR include sufficient flexibility, so as to ensure, that sustainable development opportunities are not prevented from coming forward.
- 4.1.24 Further, Gladman wishes to raise some concerns regarding the two potential new settlements at Sharpness and Wisloe.
- 4.1.25 The delivery of development on the scale and with the infrastructure complexities of the proposed new settlements, will clearly require the Council to approach development with a different mindset. Given that the level of infrastructure required is likely to be costed in the

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<sup>2</sup> [https://www.cla.org.uk/sites/default/files/FINAL\\_CLA%20StrongFoundations%20Sustainable%20Villages%20lo%20res.pdf](https://www.cla.org.uk/sites/default/files/FINAL_CLA%20StrongFoundations%20Sustainable%20Villages%20lo%20res.pdf)



millions of pounds and will require cooperation from third parties, the Council will very clearly need to demonstrate where the levels of funding are coming from and how the delivery of the allocations will be viable.

- 4.1.26 In line with our above comments, Gladman considers that there is considerable further work and explanation needed by the Council to demonstrate that the proposed new garden settlements are deliverable. The current approach runs the risk of overpromising on what the new settlements can actually deliver (or indeed if they can be delivered at all within the expected timeframes) and therefore a more considered approach to viability, funding, highways and landownership is urgently required.

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

- 4.1.27 Whilst we support the intention for the bulk of development to focus on the large settlements in the District, Gladman suggests that through the Local Plan, there is an opportunity to improve the sustainability of a wide range of settlements by allocating a meaningful amount of land for development of housing and associated services. This links to the point made earlier in these representations that promotes policy makers to consider how development could make a settlement more sustainable by supporting appropriate levels of growth.
- 4.1.28 Gladman considers Kingswood to be a sustainable location for growth, capable of accommodating meaningful development. There are a number of local services and facilities available within a reasonable walking distance. The Council's Settlement Role and Function Study confirms that Kingswood has a very strong employment role, with approximately 1,200 jobs based locally, and therefore we suggest that the level of planned growth in Kingswood should be reviewed accordingly and its status in the plan elevated to one of a growth settlement.

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

- 4.1.29 In general, we support the Council's overall approach to dealing with unmet need arising from Gloucester. Gladman refers the Council to Paragraph 35 of NPPF18 which states that local plans should be positively prepared and provide a strategy, which as a minimum, seeks to meet in full local housing needs and further, is informed by agreements with other authorities, so as to ensure that any unmet need arising from neighbouring areas is accommodated where appropriate. In order to meet in full, the legal requirements of the Duty to Co-operate, the Council's should engage on a constructive, active and on-going basis with neighbouring authorities to maximise the effectiveness of plan making.

- 4.1.30 In line with the requirements of the Framework, it is essential that the LPR is prepared through joint working on cross boundary issues, such as where unmet need arises. This includes close working with Gloucester Council and other neighbouring authorities. A Statement of Common Ground (SoCG) signed by all respective authorities, in accordance with the Paragraphs 24, 25 and 27 of the NPPF18, should address the meeting of unmet needs.

**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?**

- 4.1.31 We consider it necessary that a comprehensive review of the settlement hierarchy is undertaken, including those currently proposed to be in tier 4 and 5.
- 4.1.32 Gladman does not consider the use of development limits to be an effective response to future development proposals if they would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework. Beyond, this, Gladman considers it necessary that the plan recognises that within the plan period, it may be necessary for greenfield development, outside the development limits in all tiers, to come forward to assist with meeting local housing needs. As such, we recommend that sufficient flexibility is established in the policy so as to ensure that the plan can adjust to any local changes.

**Question 4.4a – Do you support the emerging Strategy’s approach towards maintain settlement development limits?**

- 4.1.33 As per our above comments, Gladman does not support the use of development limits if they would act to prevent otherwise sustainable development opportunities from coming forward.
- 4.1.34 Beyond the above point, however, we consider it necessary that the existing development limits are comprehensively reviewed as part of the local plan review process.

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

- 4.1.35 Again, as per our above comments, Gladman supports the proposal to allow development beyond settlement development limits. We are however concerned that there is no evidence available to suggest that it is appropriate to limit this development to a maximum of 20 dwellings.

## 5 SITE SUBMISSIONS

### 5.1 Land at Charfield Road, Kingswood

- 5.1.1 As the Council are aware Gladman is promoting land at Charfield Road, Kingswood for residential development and associated community infrastructure. The site is subject to a live planning application (S.18/2617/OUT) for up to 50 dwellings with associated public open space, structural planting and landscaping, surface water attenuation ponds and ancillary works,
- 5.1.2 A location plan is included at appendix 1 of this submission. Gladman believes that the site offers a real opportunity to the residents of the local community and the wider area to assist in meeting the identified housing needs and deliver significant improvements to the public realm, including the provision of public open space.
- 5.1.3 The site is free from significant constraints. As set out in the comprehensive set of documents that support the planning application, the site is not subject to, nor especially sensitive in terms of any built or natural protection designations. The proposed housing development will not therefore result in significant harm in terms of acknowledged amenity, community, heritage, landscape, traffic, environmental, technical or other acknowledged public interests.
- 5.1.4 The site extends approximately 3.32 hectares and can be directly accessed off Charfield Road which forms the site's northern boundary. The site is contained to the east by existing residential development. The western and southern field boundaries are bordered by interspersed hedgerows.
- 5.1.5 Taking into account the recent pattern of growth in the settlement, the development of this site represents a logical expansion of Kingswood. The development of this site provides the following community benefits:
- The development of this site will help to maintain a thriving and vibrant community and will ensure the longevity of local services such as shops, community facilities and schools.
  - Deliver a mix of housing types and sizes to meet strategic needs of the local housing market, including market and affordable housing. This will demonstrably support and secure the current and future vitality of the local area. New homes will enable people to access the housing market locally rather than being forced to move away due to a lack of available housing.
  - The application proposes a policy compliant level of affordable housing, provided at 30% overall equating to 15 dwellings.

- The development also has the potential to support in the order of 56 direct full-time construction jobs and 61 indirect supply chain jobs during the construction phase of the development. In addition, the development would accommodate approximately 115 new residents who will directly support the local Kingswood economy.
- In addition, the development is also predicted to have a significant financial impact once operational including; £800,000 Council Tax income over 10-year period and £300,000 New Homes Bonus payment over a four-year period, along with CIL contributions.
- The illustrative masterplan submitted as part of the application is landscape led and therefore Green Infrastructure and public open space are an integral part of the scheme. The proposed Green Infrastructure includes a community orchard, as well as new tree planting to enhance the proposals and to assimilate them into the wider area.
- The two Public Rights of Way (PRoW) which cross the site, Kingswood Footpath 6 and Footpath 12, will be retained within the proposed public open space and enhanced as part of the proposals. These PRoWs will form green corridors throughout the development and links to the site's wider surroundings.
- A new footpath has also been proposed to adjoin the existing gated pedestrian access to the north eastern corner of the site at Footpath 6, which will enhance the site's connectivity to the existing settlement of Kingswood. The proposed pedestrian infrastructure improvements would also facilitate and encourage the use of sustainable modes of transport, whilst connecting directly into the existing provision.
- The site is located in Flood Zone 1 in its entirety. The developable area is therefore in Flood Zone 1 – Very Low Risk – with an annual probability of flooding less than 0.1% (1 in 1000).

5.1.6 Gladman submits that the site is available and suitable for residential development and request that the Council considers the benefits listed above and note the ability of the site to assist Stroud in meeting its local housing needs. We consider that the site should be allocated for residential development and would welcome the opportunity to discuss our proposals with the Council in more detail.

## **5.2 Land at Summer Street, Stroud**

5.2.1 Again, as the Council is aware Gladman is promoting land at Summer Street, Stroud for residential and associated community infrastructure. We consider that the site is capable of delivering up to 20 dwellings, including at least 30% affordable housing, with informal open space and associated ancillary works.

- 5.2.2 A location plan is included at appendix 2 of this submission. Gladman continues to submit that the site represents a sustainable location for residential development that can assist the Council in meeting its identified housing needs.
- 5.2.3 The site in itself is not subject to, any built or natural protection designations and offers the potential to accommodate a residential development of exceptional quality that responds positively to its context. A landscape led approach to the design of the scheme will ensure no unacceptable impact to the setting of the Cotswolds AONB by concentrating development along the southern edge of the site, abutting existing residential development along Summer Street.
- 5.2.4 The application site covers approximately 2.34ha and is currently used for pastoral agriculture. There is a Public Right of Way running along its western edge, which links Summer Street with Slad Road, crossing Slad Brook. The site slopes downwards towards the northern boundary. It is bounded by existing built form along its southern edge and further open pastoral fields to the east, west and north.
- 5.2.5 The site is sustainably located within walking and cycling distance of a range of facilities in Stroud, including; Primary School, Convenience Store, Supermarket, Employment Sites, Library, Community Centre, Dentist and GP Surgery.
- 5.2.6 The development of this site provides the following community benefits:
- Boosting the supply of land for housing, providing for high quality market family housing within a sustainable location. The development proposals will make a valuable contribution to the 5-year supply of Stroud.
  - The proposed development of up to 20 net additional dwellings will provide a balanced mix of dwellings providing a choice of type and size in response to the identified housing demand and market assessment for Stroud.
  - The development of the site provides the opportunity to create new footpath links across the site as well as access to land in the wider ownership of the developer that is currently inaccessible to the general public.
  - The development proposals seek to discharge surface water from the site into SUDs swales which will ultimately discharge at less than Greenfield run-off rate. This will provide significant benefits to the local community immediately surrounding the site.
  - In addition to the delivery of housing the proposals will also deliver a number of economic benefits which include New Homes Bonus totalling £289,000, 22 FTE jobs in construction, a further 24 indirect jobs in associated industries and total gross expenditure of £416,000 annually.

5.2.7 Gladman submits that the site is also available and suitable for residential development and requests that the Council consider the benefits listed above and note the ability of the site to assist in meeting Stroud's identified housing needs. We consider that the site should be allocated for residential development and would welcome the opportunity to discuss our proposals with the Council in more detail.

## 6 CONCLUSIONS

### 6.1 Assessment against the tests of soundness

- 6.1.1 Having considered the LPR Emerging Strategy, Gladman is concerned by a range of matters including the proposed housing provision and distribution of growth.
- 6.1.2 The Plan must be positively prepared, effective, justified and consistent with national policy, and the overarching strategic policies relevant to the plan area to be found sound at examination.
- 6.1.3 Through this representation, Gladman has expressed concerns regarding the Council's stated intent to use settlement development limits to restrict development on the edge of Tier 1-3 settlements to a maximum of 20 dwellings. We do not consider that this is an appropriate response and have suggested that the Council seek to ensure that sufficient flexibility is established in any development plan policies so as to ensure that sustainable development opportunities are not prevented from coming forward.
- 6.1.4 Gladman has land interest at Charfield Road, Kingswood and Summer Street, Stroud. We consider that both sites are sustainable and suitable for development of 50 dwellings and 20 dwellings respectively.
- 6.1.5 Gladman welcomes the opportunity to comment on the LPR Further Options consultation and hope that the Council finds these submissions constructive. Gladman requests to be added to the consultation database and looks forward to reviewing future versions of the LPR in due course.