

Part B – Please use a separate sheet for each representation

Name or Organisation: Vistry Group

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Wotton Cluster

The Pre-submission draft Local Plan only proposes a single housing allocation within the Wotton Cluster. This appears to be primarily as a result of Wotton-under-Edge, the largest settlement within the Cluster and a Tier 2 settlement, being highly constrained and therefore offering limited opportunity for further growth.

As noted in representations made in relation to Core Policy CP3, the plans failure to allocate any meaningful numbers of housing to the Wotton Cluster leads to an

imbalance of housing provision across the plan area and will not enable some of the key issues and top priorities for the Wotton Cluster to be addressed.

It would be appropriate for the plan to allocate further development to Kingswood to help meet the need of Kingswood, Wotton-under-Edge and the wider Wotton Cluster area.

The proximity to the South Gloucestershire boundary also needs to be taken into account. Whilst it is acknowledged that the West of England Authorities have agreed to address their housing need within their plan area, it must be acknowledged that the Wider Bristol Housing Market area extends in to the southern part of Stroud District (SoCG WoE and Stroud District Council) and there will therefore be a pressure on housing in this location.

Kingswood is physically well related to Wotton-under-Edge and shares a number of facilities with it. It is therefore well placed to take any housing that would normally be directed to Wotton-under-Edge as a Tier 2 settlement were it not physically constrained. However, despite this there is no mention or acknowledgement of the connection and relationship between the two settlements within the plan.

Within the Wotton Cluster is also one of the main proposed employment allocations at Renishaw New Mills (10ha of New Mills) as an extension to the Global headquarters of Renishaw. The plan acknowledges Renishaw Ltd role as a major employer and also notes that the site is just outside the village of Kingswood. The proposed employment allocation also includes improved walking and cycling routes between Renishaw, Wotton-under-Edge and Kingswood. It would therefore be a sound approach to balance the provision of one of the largest employment allocations in the district with an appropriate level of housing provision. With the constraints associated at Wotton-under-Edge, Kingswood is ideally suited to provide this and is further from the AONB.

Vistry's site at Land at Wotton Road, Kingswood would provide an appropriate housing allocation to help address the balance of housing provision within the Wotton Cluster. It is ideally located to meet the needs of both Kingswood and Wotton-under-Edge.

The site was assessed in the 2019 Sustainability Appraisal (ref KIN001) and the following conclusions are of note:

- KIN001 scores well against housing, services and facilities, employment and economic growth SA objectives;
- The site has negligible effects on social inclusion, crime, vibrant communities water quality, climate change and waste;
- There are uncertain effects against biodiversity/geodiversity;
- Mixed effect against health (ie -/+). However, the SA commentary describes the site as being more than 800m from a walking path which is incorrect - the site actually contains a public right of way, linking directly with the wider PROW network, and the site is also very likely to contain some public open space. In addition Sustrans have approached the landowner in relation to inclusion of part of the Wotton, Charfield and Kingswood Greenway Project within the site. therefore, the performance should actually be -/++;
- There are negative effects against air quality and efficient land use (although the allocated site PS38 has the same negative performance

against these objectives and this would apply to all sites within Kingswood); and

- There is negative performance against the landscape/townscape objective and the historic environment objective.

The pre-submission plan states (page 204) that “the preferred directions of housing growth in landscape terms are to the southwest and to the southeast” of Kingswood. This is supported by the Stroud Landscape Sensitivity Assessment which includes land at Wotton Road in a land parcel (ref K05) which extends to the settlement boundary (south of Vineyard Lane) and includes additional fields to the south east of Land at Wotton Road. This states that this land parcel has a “high/medium” sensitivity to housing development. However, much of this land parcel’s sensitivity appears to relate to the area within the floodzone (outside of Land at Wotton Road).

A landscape and Visual Study has been undertaken by LVIA ltd for the Land at Wotton Road and this noted that the site does not have a sensitive landscape context, being situated adjacent to the existing urban fringe of Kingswood and having existing development adjacent to it and that sensitively designed residential development could be accommodated on site without causing undue harm to landscape features, landscape character, the Cotswold AONB purpose and special qualities or the visual baseline.

With regards to heritage impacts, the Sustainability Assessment notes the SALA Heritage Impact Appraisal score of ‘2=some impact on heritage constraints (moderate sensitivity) (SALA scores sites between 1=no significant heritage constraints to 4= very significant heritage constraints (highly sensitive)). It is therefore clear that the study considers that there would not be significant heritage constraints to the development of the site.

The attached Vision Document provides a detailed description of the site and has taken into account landscape and visual studies and a heritage assessment of the site and shows how development of between 100-120 dwelling could be sustainably provided on site whilst providing additional benefits such as improving pedestrian links from Kingswood to Katherine Lady Berkeley Secondary School, and wider links as part of the Sustrans Wotton, Charfield and Kingswood Greenway Project (WCK Greenway)

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The provision of a minimal level of planned housing growth in the Wotton Cluster is unjustified and would render the plan ineffective as there will be an insufficient distribution of housing across the plan area and the plan will fail to meet the issues and top priorities for the Wotton cluster recognised within the plan.

To make the plan sound the following changes are necessary to the Wotton Cluster Section:

- Delete reference to floodplain being a physical constraint. Whilst it is a clear constraint to development within it, there is land beyond this which is built on (such as the Secondary School and care homes) and there is further scope for development
- Delete reference to landscape sensitivity – the inference that the north of settlement of Kingswood is landscape sensitive is not justified and the comment is unnecessary. There is no justification for a preferred direction of housing growth to the south west and to the southeast when these are potentially further away from the centre of Kingswood, and from the Secondary School than development to the north and further from facilities at Wotton-Under-Edge
- Include reference to the connections and shared facilities between Kingswood and Wotton-under-Edge
- Allocate additional housing to Kingswood which will help balance new employment/housing provision in the area. Land at Wotton Road, Kingswood would be an appropriate sustainable allocation.
- Change reference to Kingswood as Tier 3a to Tier 2 settlement on page 204

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

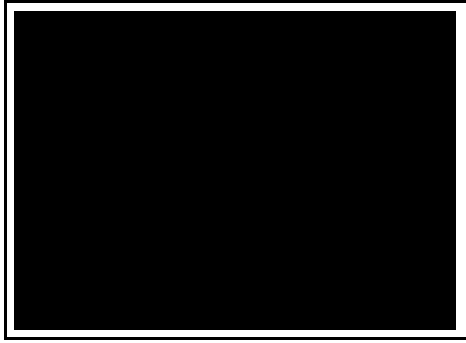
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It will be necessary to participate in the hearing sessions as there are a number of important points to raise which may need to be addressed individually. It may be necessary to respond to any points raised by the Local Authority and we may need to be available to answer any questions on these representations which the Inspector may wish to raise.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:21/07/2021

