

Date: 12th December 2020

Our ref:

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Dear Sir or Madam,

Representation for the Stroud District Local Plan Review Draft Plan: Additional Housing Options: Land adjoining the southern boundary of Fieldway, Upton St Leonards

This representation to SDC's Additional Housing Options Paper has been prepared by Bruton Knowles and should be read in conjunction with the previous representations made on this land.

As set out in the Additional Housing Options Paper, the Government's revised standard method means that SDC may need to increase their housing requirement from 638 homes per annum, to 786 homes per annum. Current monitoring sets out that they may have to find land for an additional 1,050 to 2,400 homes between now and 2040.

In light of this new requirement, this representation has been put forward to illustrate why the above site should be brought forward as a housing allocation in the upcoming publication plan (Reg. 19 consultation).

Under section 1, SDC have set out additional housing/spatial options similar to the initial Issues and Options Paper back in Autumn 2017. In terms of the spatial options, option A suggests intensifying urban extension sites already identified. Option B sets out that further housing sites could be allocated to smaller Tier 2 towns and Tier 3 larger villages in the District. Option C sets out whether new growth points could be provided along the main movement corridors within the District (A38, A419, and A4135), and option D asks whether a wider dispersal of new housing to include small sites at Tier 4 villages could be provided.

Firstly, it seems odd that option D has been put forward for this consultation, given that Tier 3b settlements do not currently propose to allocate housing growth over the next plan period, in contrast to tier 3a settlements which propose to allocate a total of 3,995 dwellings. Both Tier 3a and 3b settlements have a greater number of services and facilities than tier 4 settlements.

Nevertheless, a response to the relevant spatial option questions included in this consultation is provided below:

Question 1: Which strategy option(s) would you support, if additional housing land is required?

Bruton Knowles supports the implementation of spatial option B (Q1b) and considers that SDC needs to include proposed housing allocations at Tier 3b settlements in their upcoming publication plan (Reg. 19 consultation).

Bruton Knowles suggest that SDC should revisit their Settlement Role and Function Study Update 2018 and consider new Tier 3b settlements for proposed housing allocations in their upcoming publication plan (Reg. 19 consultation). Settlements such as Upton St Leonards have an equal or better provision of community services/facilities than 10 settlements that were all considered tier 3a settlements, suitable for proposed housing allocations.

In addition, it is important to note that Upton St Leonards was originally considered as a broad location for future housing, in the Issues and Options Paper. Sites UPT003 and UPT004, were included as housing options and removed at the Preferred strategy (Reg. 18 consultation) stage. Bruton Knowles suggest that these two sites should be reinstated and that my client's site UPT012 should also be included as a housing option.

In regards to other spatial options, it should be considered that there seems to be already too much reliance on large strategic housing allocations, which take a lot longer to build out than smaller housing sites (up to 50 dwellings). The additional options include further proposed development at Hardwicke and development at Whitminster, which seems extremely premature given that existing commitments (SA2 land west of Stonehouse and SA4 Huntsgrove extension) are still a long way off completion.

Option D does not seem to be viable, as housing allocations at Tier 3b are still yet to be considered.

Question 2: [REDACTED] support the approach of identifying a reserve site or sites, if housing development [REDACTED] sites that will be allocated in the Local Plan should fail to come forward as envisaged?

Bruton Knowles supports the approach that SDC should identify reserve sites, in the upcoming publication plan (Reg. 19 consultation).

Question 4: Which strategy option(s) would you support, if a reserve site (or sites) is required?

Bruton Knowles supports the approach that SDC should identify reserve sites, if these sites are distributed among Tier 2 towns and Tier 3 villages, in accordance with option B. Reserve sites by their nature need to have the ability to come forward at a quick rate, if SDC's housing delivery rate drops below the required threshold. The inclusion of smaller reserve sites (up to 50 dwellings) will ensure that the deliverability of a site will happen at a much quicker rate than larger housing sites.

If my client's site is again ruled out as a future option for a housing allocation, in the upcoming publication plan (Reg. 19 consultation), then we would encourage SDC to promote it as a reserve site.

Question 6: If a site in the Local Plan does not come forward for development as expected, then a reserve site(s) may be required. However, the "trigger" for allowing a reserve site or sites to receive planning permission needs to be clearly set out in the Plan, to avoid doubt or uncertainty. There could be a variety of triggers / reasons for bringing a reserve site into play.

What should trigger a reserve site (or sites) coming forward?

Bruton Knowles consider that there should be two triggers for a reserve site coming forward. These should include, delays in an allocated Local Plan site receiving planning permission and where there is evidence of persistent failure to deliver housing at the required build rates, set out in the Local Plan.

Both of these scenarios affect the deliverability of housing and that is the reason both should be included as appropriate triggers.

We trust that the above commentary is useful and for ease of reference, we have again included a location plan of my client's site and an assessment of its suitability, which can be found in appendix A.

Should you have any queries please let me know.

Yours sincerely

A black rectangular redaction box covering the signature of David Smart.

David Smart
David Smart BSc (Hons) MSc MRTPI
Planner

Appendix A

Site UPT012 Assessment and Location Plan



Suitability of land adjoining the southern boundary of Fieldway, Upton St Leonards

The above land set out in the supporting location plan, is in a sustainable location because it is located on the outskirts of Upton St Leonards which forms part of an urban extension to Gloucester. The site is located circa 3.5 miles from junction 11a of the M5 motorway and has access to numerous facilities in the village and Gloucester's wider area.

It should be considered that Upton St Leonard's future growth is somewhat restricted, because as noted in the 2017 SALA, its principal physical constraints are; the floodplain to the south west and north east, the proximity to the M5 to the west, and the Cotswold AONB which adjoins the settlement to the south and east.

The latest Landscape Sensitivity Assessment sets out that Upton St Leonard's preferred direction for housing growth in landscape terms is to the south east to improve the settlement edge so that it becomes better screened and less indented. The future development of SALA sites UPT002, UPT003 and UPT004 along with the subject site (UPT012) will round off the built form of the village.

A desktop appraisal of significant issues on and around the site has been undertaken to inform this representation:

Heritage

The nearest heritage asset is Teckels Cottage (1154997) which is Grade II listed and is located circa 125 metres from the site's boundary to the south. It is separated by a field and allotment and there is a satisfactory buffer in place to ensure that the site's development will not adversely impact the heritage asset.

Landscape

The site is not set within any sensitive landscape designations apart from being located in the Cotswold AONB. Its development along with SALA sites UPT002, UPT003 AND UPT004 could help round off existing development.

Ecology

The majority of the site is in agricultural/equestrian use with limited if any ecological benefit. The ecological benefit of the site is likely to relate to the boundary features of the site which will be retained and improved upon by planting additional trees in any future development.

Access

Access to the site is gained via a gated entrance from The Stanley which has good visibility in both directions. A public footpath referred to as Upton St Leonards footpath 36 runs to east of the site. This footpath is outside the site's boundary and will not need diverting.

Drainage

Environment Agency Flood Risk mapping for land-use planning indicates that the majority of the site is located in flood zone 1. This indicates that the overall site has a low probability of flooding (less than 1 in 1,000 annual probability of river flooding) and can be developed.

A small section to the east of the site is located in flood zone 2, and this area which measures circa 0.25 hectares is not proposed to be developed and will be used as open space for future residents.

Affordable Housing

The adopted Stroud Local Plan sets out that there is a shortfall of affordable dwellings and that an additional 446 per annum are required.

Summary

In considering the above, there would appear to be no overriding physical constraints or potential impacts preventing sensitively located development for a small to medium scale residential scheme.

Bruton Knowles would like to express that the site is under single ownership and that it is immediately available and deliverable over the next 5 years. For these reasons the site would make an appropriate residential allocation for either open market or self-build units.



HM Land Registry
Official copy of
title plan

Title number **GR346444**
Ordnance Survey map reference **SO8614NE**
Scale **1:2500**
Administrative area **Gloucestershire : Stroud**



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