

LEONARD STANLEY

P A R I S H C O U N C I L

To the Local Plan Review Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

Local Plan Review – Pre-Submission – Draft Local Plan – Regulation 19 Consultation May 2021

In response to this consultation, LSPC is extremely disappointed that despite several written submissions and proactive face-to-face discussions with the SDC planning team, little has been done to address its previous concerns, both in relation to the specific plans for Leonard Stanley and also to the more general principles contained within the overall document.

In addition, the Review appears to have taken only limited account of the general consensus achieved and principles put forward by representatives of a wide-ranging cross-section of Parish and Town Councils at a Local Plan Review forum. This is particularly apparent in comments made on page 102 of the review (see further comments below). It also still contains some worrying contradictions and is therefore misleading.

1) Levels of Growth/Housing allocations

Page 23 states:-

*2.3.8 In order to meet wider development needs and to support and improve existing services and facilities at smaller towns and larger villages, **modest levels of growth will be delivered at the local service centres of Berkeley, Minchinhampton, Nailsworth and Painswick.***

*2.3.9 **Lesser levels of growth will be delivered at the villages of Brimscombe & Thrupp, Eastington, Frampton-on-Severn, Kings Stanley, Kingswood, Leonard Stanley, North Woodchester and Whitminster.** These are villages that have a range of local facilities and already benefit from good transport links, or they have the potential to develop better transport links to strategic facilities at the nearby towns of Stroud and Wotton-under-Edge, where growth potential is limited by environmental constraints.*

Page 34 states:-

*2.5.8 **Modest housing allocations will also be delivered at the local service centres of Berkeley, Minchinhampton, Nailsworth and Painswick and lesser levels of housing will be allocated at the Tier 3a villages of Brimscombe and Thrupp, Frampton-on-Severn, Kings Stanley, Kingswood, Leonard Stanley and Whitminster.***

Page 53 under Core Policy CP2; **site allocations** suggest that Leonard Stanley will 'grow' significantly more than many listed in 2.3.8. The statements made under 2.3.8, 2.3.9 and 2.5.8 are completely misleading, as for example, Brimscombe & Thrupp has an allocation of 190 whilst Painswick just 20!

2) Sustainable Communities

Page 54 – Statement: *2.9.15 One of the primary aims of establishing a settlement hierarchy is to promote sustainable communities by bringing housing, jobs and services closer together in an attempt to maintain and promote the viability of local facilities and reduce the need to travel to services and facilities elsewhere. A settlement hierarchy policy can help to achieve this by concentrating housing growth in those settlements that already have a range of services (as long as there is capacity for growth), and restricting it in those that do not. The development strategy aims to prioritise growth at sustainable locations, in accordance with the settlement hierarchy set out here in Core Policy CP3.*

LSPC is deeply concerned that no consideration has been given to the recent levels of 'growth' that Leonard Stanley has already undergone. The proposed allocations are NOT sustainable. As our previous response to the Emerging Strategy clearly pointed out, residents have struggled to access services like GPs, dentists and schools. The Plan MUST take into account previous growth as well as future growth; to ignore this is disrespectful to our community.

The proposed site allocations will further erode the valuable green spaces within our village and can only be detrimental to the environment and wildlife.

3) Page 229 Core Policy CP9 Affordable Housing

“Within the Cotswolds Area of Outstanding Natural Beauty or the designated rural areas of Alderley, Alkington, Amberley, Arlingham, Bisley with Lypiatt, Brookthorpe with Whaddon, Coaley, Cranham, Eastington, Frampton on Severn, Fretherne with Saul, Frocester, Ham and Stone, Hamfallow, Harescombe, Haresfield, Hillesley and Tresham, Hinton, Horsley, Kingswood, Longney and Epney, Miserden, Moreton Valance, North Nibley, Nymphsfield, Painswick, Pitchcombe, Slimbridge, Standish, Stinchcombe, Uley and Whitminster, sites capable of providing 4 or more dwellings (net) will be required to provide at least 30% affordable housing.

In all other areas, sites capable of providing 10 or more dwellings (net), or covering a site area of 0.5 hectares or more, will be required to provide at least 30% affordable housing. The Council will negotiate the tenure, size and type of affordable units on a site by site basis, having regard to housing needs, site specifics and other factors.”

However, in the current local plan **“All residential proposals of at least 4 dwellings (net) or capable of providing 4 dwellings (net) covering a new site area of at least 0.16 ha will provide at least 30% of the net units proposed as affordable dwellings, where viable.”**

The amendments to this policy do not make sense, as the consultation clearly demonstrated the need for more affordable housing; so why in areas outside the AONB is it acceptable to ask for less affordable housing than the current plan?

4) Page 102 Potential Sites PS16 & PS42

The map is out of date and therefore misleading, as it doesn't show the large development that has already taken place.

The statement with regards to Landscape Sensitivity – *“The preferred direction of housing growth in landscape terms is to the north and northwest of the settlement. There is no identified preferred direction of employment growth in landscape terms.”* As any development to the north / northwest would be outside the settlement boundary, this statement is not welcomed, as it implies that development there would be acceptable. It is not. Please remove this statement, as it contradicts Core Policy 3 (page 55) *“Further development will be focused inside settlement development limits”*.

Furthermore, in response to a previous planning application for development on land to the north and north west of Leonard Stanley, a Government Planning Inspector ruled that such a development would be detrimental to the rural and aesthetic aspect from the village in that particular direction and was therefore unacceptable.

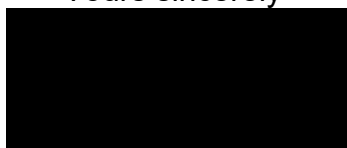
In relation to the site allocations PS16 and PS42, as previously stated LSPC is deeply concerned that no consideration has been given to the recent growth and sustainability. LSPC is devastated by the prospect of losing even more valuable green spaces within our village and has previously requested that these site allocations be removed. Furthermore, previous submissions have been made to the planning team at SDC regarding certain negative or inadvisable aspects of these two sites as follows:

PS16: this land is owned by Gloucestershire County Council. Despite requests to GCC, no information has been forthcoming with any proof that the covenant which existed to protect this land for the future expansion of the school has been lifted. If expansion becomes necessary and plot PS16 is developed, the school will be forced to extend its buildings onto their existing playing field. The Council finds the potential loss of some of the schools playing field as unacceptable and therefore requests that a sufficient area of Plot PS16 is retained for its original intended purpose.

PS42: the access to the proposed site from Dozule Close is highly undesirable. To direct more vehicles through the entire village makes no sense, from both an environmental and a safety perspective. If this site allocation is to remain, then the entrance needs to be from either Lyndon Morgan Way or Bath Road (potentially via site PS16). At the very least, accessing site PS42 from the cul-de-sac (north) end of Dozule Close would be totally unacceptable.

In conclusion, LSPC is very disappointed by the fact that most its concerns raised in the previous consultations have been 'overlooked' and it does not fill this Council or the community with confidence that their views are being listened to.

Yours sincerely



Clerk

Copy to: District Cllr Nigel Studdert-Kennedy
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