



Stroud Local Plan Review

Representations on behalf of Colethrop Farm Limited

On behalf of **Colethrop Farm Limited**

Project Ref: 45627/001 | Rev: 1 | Date: January 2020

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU
Office Address: 10 Queen Square, Bristol, BS1 4NT
T: +44 (0)117 332 7840 E: PBA.Bristol@stantec.com

Document Control Sheet



Project Name: Stroud District Local Plan Review

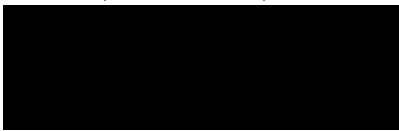
Project Ref: 45627

Report Title: Representations on behalf of Colethrop Farm Limited

Doc Ref: 01

Date: January 2020

	Name	Position	Signature	Date
Prepared by:		Principal Planner		January 2020
Reviewed by:		Director		January 2020
Approved by:		Director		January 2020
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved
-	January 2020	Stroud District Local Plan Review Draft Plan Consultation			
01	January 2020	Final for Submission			

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

Contents

1	Introduction	1
1.1	Background	1
1.2	Structure of These Representations.....	1
2	Representations	3
2.2	Do you support the Council’s preferred strategy for meeting Stroud District’s future growth and development needs?	3
2.3	Any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies? .	4
2.4	Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?	8
3	Conclusions	12

Appendices

Appendix A CFL Landownership in Haresfield

This page is intentionally blank

1 Introduction

1.1 Background

- 1.1.1 Stantec is instructed by Colethrop Farm Limited (CFL) to submit representations to Stroud District Council (SDC) in relation to the Stroud District Local Plan Review. The draft Local Plan is being consulted upon until 22 January 2020. Previous representations were submitted to the last Local Plan consultation, which should be read in conjunction with this representation.
- 1.1.2 The purpose of the Local Plan Review consultation is to establish whether SDC has identified the correct preferred strategy for growth and development needs, as well as whether any further changes to proposed policies and supporting text is required.
- 1.1.3 These representations are made in relation to land owned by CFL at Hunts Grove, Quedgeley East and Haresfield. The representations relate to these parcels of land and cover the relevant sections of the draft Local Plan, which are submitted in the interests of achieving a sound plan and meet the growth objectives for Stroud District.
- 1.1.4 In response to the consultation document, CFL's comments can be summarised at this stage as:
- Support for a flexible plan that provides enough land to meet a likely increase in housing need (derived from expected changes to the Standard Methodology).
 - Land at Hunts Grove Extension (750 homes) is already allocated for housing in the adopted Stroud Local Plan and identified for continued allocation in the draft Local Plan. The site is in the process of being delivered by Crest Developments, CFL and other parties. It should remain an allocation in the emerging Local Plan to provide surety and guide planning applications.
 - Land at Quedgeley East Business Park forms an extension to the granted St Modwen planning permission and is proposed to be allocated in the emerging Local Plan. CFL supports this proposal but suggests that it may be beneficial to consider a mixture of uses on the site as it is a transition site.
 - Land at Haresfield has been identified to SDC as a small housing site adjacent the village. Sites such as this can be beneficial in helping to ensure Haresfield remains a balanced and sustainable community and is of a scale that could deliver community benefits. CFL suggests that it is better to consider the allocation of a small parcel of land which will deliver benefits rather than rely upon windfall development in this settlement.
 - By way of conclusion, there has been much change in the Quedgeley / Haresfield area in recent years, including the construction of several major development projects. This has changed the landscape around J12 and J13 and supports the notion of support for further growth in this area.

1.2 Structure of These Representations

- 1.2.1 The purpose of this consultation is to consider the following matters:
- i. The level of support for the Council's preferred strategy for meeting Stroud District's future growth and development needs?

- ii. Any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?
- iii. Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?

1.2.2 These representations provide a response to each of these questions.

2 Representations

2.1.1 CFL recognises the relevance of a plan-led system as a means of delivering housing, employment and infrastructure to meet local needs. At the same time, it is necessary to be responsive from an environmental and social perspective to build sustainable and successful communities. Our representations are written within this context and are focused on finding ways to achieve this outcome and provide comments to inform a sound Local Plan.

2.2 Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?

Preferred Strategy

- 2.2.1 CFL is generally supportive of the proposed strategy, subject to the comments and recommended changes outlined in these representations.
- 2.2.2 The strategy reinforces housing growth in locations which provide the greatest opportunity for sustainable development. CFL supports a strategy that directs development to existing major settlements including South of Gloucester, Stonehouse and Cam and along the A38/M5/rail corridor, as they provide existing transport infrastructure, community facilities and services and employment.
- 2.2.1 It is important to support village community facilities and services with appropriate amounts of development to retain these services and the vitality of smaller settlements. There needs to be a balance with some growth in smaller settlements which have a good level of community facilities. Otherwise settlement population can stagnate and even decline.
- 2.2.2 Detailed response to the Council's strategy for Hunts Grove, South of Gloucester, Whaddon, Sharpness and Haresfield is set out under the second SDC consultation question below.

CP3 – Settlement Hierarchy

- 2.2.3 The draft Local Plan identifies Hunts Grove as an 'anticipated' Local Service Centre. However, Hunts Grove is located on the edge of Gloucester/Quedgeley – an urban area/city offering a range of strategic employment sites, sustainable transport infrastructure and wide range of community facilities and services. In comparison to the other Local Services Centres, identified as market towns and large villages, Hunts Grove is on the edge of a city, and therefore a higher tier settlement than Tier 1 Main Settlements.
- 2.2.4 Hunts Grove is in a similar location to the Whaddon site, which is identified in the draft Local Plan as a potential strategic location for development on the edge of Gloucester and the draft Local Plan states Whaddon has potential to meet Gloucester's housing needs. CFL suggests that Hunts Grove and Whaddon are both located south of Gloucester.
- 2.2.5 CLF recommends that Policy CP3 Settlement Hierarchy should identify Hunts Grove within a Tier 'South of Gloucester', which should be placed above the current draft Tier 1 Main Settlements of Cam and Dursley, Stonehouse and Stroud, as Gloucester is a city and major urban area.
- 2.2.6 Comments relating to Tier 4b and Haresfield are provided under the second consultation question below.

Supporting Infrastructure

- 2.2.7 There has been much change in the Quedgeley / Haresfield area in recent years, including the construction of several major development projects. This has changed the landscape around J12 and J13 and supports the notion of support for further growth in this area, which would help facilitate major infrastructure improvements.

Housing Needs

- 2.2.8 CFL supports the level of contingency incorporated into the draft Local Plan when using the current Standard Methodology for housing need and considers that the draft Local Plan is robust in its approach for ensuring enough sites are allocated to deliver the housing needs for the 20-year plan period. As considered below, the allocated sites within the draft Local Plan also provide flexibility should the standard method calculation for housing need be updated and minimum housing need to subsequently rise.
- 2.2.9 While the Council is including supply, over and above the minimum need identified by the Standard Method, it is important that this approach is maintained. The quantum of emerging draft allocations should be retained to ensure that there is enough contingency in the land supply. The figures should be kept under review to ensure that this flexibility is maintained to deal with the changes that are likely over the next few months with the release of new 2018-based sub-national population and household projections and expected government-led changes to the Standard Method itself to achieve an uplift in housing delivery nationally from 266,000 dwellings (the current standard method) to 300,000 dwellings a year by the mid-2020s.

2.3 Any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?

- 2.3.1 CFL provides detailed comments on the policies in the plan as set out below, to help Stroud District Council meet its vision and objectives for Stroud District and produce a sound plan.
- 2.3.2 CFL supports strategic growth South of Gloucester and specifically supports allocations PS30, PS32 and PS43. The NPPF addresses (at paragraph 72) that the supply of new homes can often be best achieved through planning for large-scale developments which includes new settlements and goes on to say; *“Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.” (NPPF July 2018, para 72).*
- 2.3.3 Representations relating to the proposed allocations are set out below.

Policies CP2 & PS30 - Hunts Grove Extension

- 2.3.4 CFL supports the housing-led, mixed use allocation at Hunts Grove and policies CP2 and PS30 which sets out the strategic growth and site allocation policies for the strategic site.
- 2.3.5 The Hunts Grove Extension is an existing Local Plan allocation (SA4) and CFL support this allocation, (PS30) being carried forward into the review of the Local Plan. Hunts Grove is an important, deliverable strategic site which will help meet the housing needs of the District during the early years of the Local Plan period.
- 2.3.6 A significant amount of work has been undertaken already to develop an outline planning application for the extension in response to the current Local Plan, through the commencement of a masterplan and associated local engagement with the community. As a

consequence of being allocated in the current Local Plan lot of time has now been invested and from a deliverability perspective this site is now ready to be pursued through the planning application process (as planned). The allocation of strategic sites provides surety to developers so that work can continue on the site. Therefore, it is important that the Local Plan continues to support development through allocations in the Local Plan Review.

- 2.3.7 The most up-to-date travel to work Census (2011) data shows a large number of people travel from Stroud to Gloucester. Allocations at Hunts Grove Extension provides those commuters with the option to live at Gloucester. This can help reduce commuting by car and the impact on climate change, in line with draft Local Plan policy DCP1 Delivering Carbon Neutral by 2030.
- 2.3.8 Retaining the existing housing allocation at Hunts Grove will contribute to the short-term delivery of sustainable development, providing homes, jobs and services south of Gloucester. Hunts Grove is located adjacent a large urban area which comprises (existing and planned) major employment, good public transport connections and a wealth of community facilities and services. There is a commitment to deliver the existing allocations at Hunts Grove from both Stroud District Council, CFL and partners.
- 2.3.9 The wording for Policy PS30 should be consistent with Core Policy CP2. Policy PS30 Hunts Grove Extension allocates the site for 750 dwellings, while policy CP2 “*will accommodate at least...750 homes.*” The master-planning process could identify the site suitable for 750 homes or it could be higher. The allocation policy PS30 should include the text ‘at least 750 homes’ to allow flexibility and align with draft policy CP2. The master-planning exercise should focus on making the best use of land while creating high quality development.

CP2 & PS32 - Quedgeley East Extension (south of M5/J12)

- 2.3.10 CFL supports the proposed allocation at Quedgeley East Extension, and policies CP2 and PS32 which set out the strategic growth and site allocation policies for this site.
- 2.3.11 Part of the extension to Quedgeley East has planning permission (SA4a) and St Modwen is already nearing completion. CFL supports the principle of further employment in this location which has become a hub for new enterprise, alongside other development. However, CFL believe that the proposed PS32 allocation should include some flexibility of land uses to ensure that a balanced local community is maintained. For this reason, CFL suggest a sound approach would be to allocate the site for employment-led, mixed use development (inc the potential for housing, local retail and leisure/community uses. This would help to manage and support the relationship of the site with both Hunts Grove, Javelin Park and nearby Haresfield. CFL believe that it is sound from a place making perspective to avoid the creation of single use employment zones.
- 2.3.12 Such an approach would help support the reduction in commuting and assist in contributing to support the District in its efforts to address the climate emergency targets in the draft Local Plan. Such an approach would create a more balanced development on the south side of the M5, which would help to respect Haresfield while at the same time responding to the benefits of this strategically important location.

CP3 & DHC2 - Haresfield

- 2.3.13 The draft Local Plan identifies Haresfield as a Tier 4b settlement and the Plan does not identify site allocations within or adjacent to the village; this is not sustainable for Haresfield. The development strategy for Haresfield in the draft Local Plan is to allow for up to 9 dwellings adjacent to development limits. This is the total number of dwellings for the whole Local Plan period up to 2040 amounts to a planned decrease in the local population as household size reduces and thus a pressure for in-commuting to support local services such as the school. A decreasing and ageing population also does not support the viability and vitality of the local

community which has suffered the closure of services like its Post Office in recent plan periods. The only way to reverse this trend is to carefully manage the delivery of small-scale growth especially where this offers local, wider community benefits such as affordable housing or the improvement/ delivery of community facilities.

- 2.3.14 The Stroud District Settlement Role and Function Study (Update 2018) identifies Haresfield as a Tier 5 village. This is based on the village having facilities of primary school, pub, community hall, playing pitches and church.
- 2.3.15 Haresfield village has a role to play in providing development at a scale that is commensurate with the settlement. Development at Haresfield should be permitted to support and enhance existing rural services within the village. CFL is keen to work with the local community to provide a new community hall and improve playing fields, supported through residential development which bring both the finance and land to achieve this, but also maintains the critical mass of population needed to sustain such facilities.
- 2.3.16 New development would bring a younger population to the village, by attracting families with children and therefore supporting the primary school and community facilities; thus, reducing current in-commuting to fill school places. Modest development of around 20+ dwellings would help respond to a re-balancing of Haresfield in this regard.
- 2.3.17 Haresfield also needs to be considered in the context of wider growth around the village and how this impacts upon its function. The Council should consider rural small settlements, which are located very close to strategic employment areas (such as Haresfield), for further modest growth (housing or mixed use). In such places, development may be able to support new community uses which enhance its long-term sustainability.
- 2.3.18 CFL recommends that SDC should take a fresh approach to planning a sustainable development strategy for villages, as set out by Country Land and Business Association in the 'Sustainable Villages – Making Rural Communities Fit for the Future' report:
- Villages are not allocated housing and have very limited development options to improve their sustainability, leaving them in a cycle of decline;
 - Sustainability assessments measure villages against a range of services and amenities more akin to how previous generations lived and used services; and
 - Technology is shaping modern life and Councils should consider the availability of broadband in the sustainability assessments of villages.
- 2.3.19 CFL is not advocating major growth at villages, but rather a pragmatic and sustainable response to decline. CFL is therefore promoting land for mixed use development adjacent the development boundary of Haresfield, as identified in **Appendix A**. There should be consideration in the Plan to a small site on the edge of Haresfield. Associated benefits include:
- The site is immediately adjacent the development boundary of the village;
 - The mix of uses could include a new community building, improved playing fields and provision of affordable housing on the site;
 - New housing (approx. 20 dwellings) would support existing and proposed community facilities;
 - New housing would assist in bringing a younger population to the village to support the primary school and existing local services;

- It could provide additional financial support to the Parish Council through Housing Delivery Grant; and
- Haresfield is close to existing employment and community facilities/services - only 700m from existing/proposed employment at Quedgeley East Business Park and 1.5 kms from new Hunts Grove extension.

CP2 and G2 Land at Whaddon

2.3.20 CFL supports the collaborative and proactive approach to housing delivery demonstrated in the draft Local Plan. The approach:

- Is in accordance with the duty to cooperate established in paragraphs 24 to 27 of the NPPF, addressing the shortfall of housing delivery in Gloucester and reacting to the individual constraints of the neighbouring JCS plan area;
- Continues the existing shared responsibility and partnership for housing delivery in Gloucestershire as outlined in the existing Memorandum of Understanding and Statement of Cooperation signed by Stroud District; and
- Provides the opportunity to promote sustainable place-making in accordance to the plan making objectives outlined in paragraph 16 of the NPPF.

2.3.21 CFL agrees that Gloucester City will be reliant on neighbouring authorities to meet its future housing growth. Housing delivery in Gloucester clearly constitutes a strategic matter requiring cooperation across authorities in accordance with paragraph 24 of the NPPF which states:

“Local Planning Authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies on strategic matters, on strategic matters that cross administrative boundaries.” (NPPF, February 2019).

2.3.22 In terms of the location of new homes, the priority should be in those which have the greatest ability to contribute to the achievement of sustainable development in accordance with paragraph 16 of the NPPF. As recognised by paragraph 268 of the JCS Inspectors Final Report (2017), the immediate review of Gloucester’s housing supply following the adoption of the JCS has allowed for the consideration of options from both within and outside the JCS area.

“The JCS authorities’ Statement of Co-operation with Stroud District provides a tool for exploring the possibility of housing land supply in Stroud contributing to the JCS authorities’ needs, where it is reasonable to do so and consistent with achieving sustainable development.” (Paragraph 269 of the Final JCS Inspectors Report, 2017).

2.3.23 It is therefore positive and rational to consider sustainable and deliverable options for housing growth to the south of Gloucester and outside of the JCS administrative area.

2.3.24 It is important to note that the JCS plan-making programme is running behind the Stroud Local Plan review. The adopted Stroud Local Plan will need to be consistent with the approved strategy in the JCS Review, to be able to conclude whether Whaddon is needed? At this stage, there are sites in Stroud District already in the planning system that are capable of delivering housing for Stroud.

2.3.25 Whilst the Council may experience pressure to release Whaddon now, it is right that the JCS determines the point at which the site is necessary to meet Gloucester’s need and that Stroud continue to treat it as a reserve site for the time-being.

CP2 & PS36 - Sharpness – pages 48, 120 and 193

- 2.3.26 Due to the characteristics of Stroud District and the constraints of the Stroud Valleys, CFL recognises the need to focus growth at new settlements. That said, such proposals need to be supported by meaningful and necessary infrastructure which often takes time to deliver and depending on the location of a new settlement can incur significant cost. If the pressure to deliver at Sharpness questions the ability to deliver it, there may be room within or around other allocation or at existing settlements.
- 2.3.27 Whilst CFL has no comment to make about the appropriateness of the strategy to include a major growth location at Sharpness, it does raise the question about short-term deliverability and the challenges to achieve a sustainable set of proposals in a viable manner in what is a more remote location (for existing services and facilities). It maybe, that to create a sustainable form of development in the short-term will require external funding such as HIF? If it proves, through the plan making process that funding is necessary to delivery sustainable infrastructure, then it is even more important that other major development locations are prioritised. It also means that the flexibility within the housing requirement is essential to the sustainability of the plan in terms of its balanced delivery approach to social, economic and climate factors. Sites like Hunts Grove and others that either have or are much closer to existing services, facilities should continue to be prioritised as they represent the greatest opportunity to respond to the climate and wider sustainability agenda.

2.4 Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?

Priority Issues

- 2.4.1 CFL supports SDC's priority issue of becoming carbon neutral by 2030 which go beyond national building standards, subject to viability testing to ensure sites are deliverable in the context of wider sustainability matters, including the local environment, social wellbeing and balanced economic growth. Carbon neutral development is one of the facets of sustainability in terms of providing a holistic approach to a settlement strategy. SDC should also recognise the changing/modern way many people are working, in terms of work/live units and working from home.
- 2.4.2 Many people commute from Stroud to other main settlements, including Gloucester. Major employers at Gloucester which should be maintained in the Local Plan. Hunts Grove and Quedgeley East provides opportunity for people to live close to where they work.
- 2.4.3 CFL supports new development being located in the right place. SDC will need to fully engage with strategic partners throughout the plan making process, to ensure that the right type and level of infrastructure is delivered in the right locations. This will help deliver sustainable communities at strategic allocated urban extensions.

Stroud District Vision

- 2.4.4 The draft Local Plan sets out a vision for Stroud District and individual visions for each of the 6 geographical strategic places within the District, including Gloucester's rural fringe.
- 2.4.5 Stroud District vision reads as an accurate description of the District. However, it does not provide a vision for the future of Stroud District. CFL supports a vision that establishes what Stroud District should achieve at the end of the plan period, rather than one which assesses the current circumstances. Policies can then be clearly informed by the vision.

2.4.7 CFL would recommend developing a vision which includes:

- A future vision for the District, in terms of the natural and built environment, jobs, homes and people;
- A future vision for how Stroud District relates to its strategic location between Gloucester/Cheltenham, Bristol and Swindon, in terms of how a vision for:
 - People/homes/jobs fit within the wider area of larger settlements;
 - Stroud District's environment within wider environmental considerations, such as Cotswolds AONB and climate change; and
 - How people will live, work and travel in the future.
- A future vision for specific strategic places in the District, providing a link to the 6 place visions set out later in the draft Local Plan.

Objectives

2.4.8 The strategic objectives positively align with the ambitions for new development at Hunts Grove. In particular, the Hunts Grove location has good access to services and is able to deliver affordable housing to meet local needs.

2.4.9 The objectives are, however, very generic and could better relate to specific settlements within the local authority area, which should follow through from the vision and into the six area visions. This should include objectives relating to the geographical areas of South Gloucester, Stroud Town in the centre, A38/M5 corridor to the west and other settlements.

The Draft Strategy's Headlines – page 26 & 27

2.4.10 The draft strategy headlines should recognise the development south of Gloucester at Hunts Grove and M5 employment development as a separate part of the development strategy within the introductory sections. The Gloucester/Quedgeley urban fringe is one of the six development areas identified in the draft Local Plan. Hunts Grove is a strategic urban extension which jointly delivering over 3,500 new homes (planning and emerging), south of Gloucester, and should be recognised in the introductory text of the draft Local Plan. Hunts Grove should also be shown Map 2 'The Development Strategy' (page 27), which has currently been omitted within the draft Local Plan map.

DCP1 - Delivering Carbon Neutral by 2030

2.4.11 As set out in objectives above, CFL supports SDC aim to deliver carbon neutral by 2030, subject to viability considerations and a balanced approach to social wellbeing, the local environment and economic stability.

CP4 – Place making

2.4.12 CFL supports policies which help to inform well design places and neighbourhoods. The policy or supporting text should refer the National Design Guide and link to the Ten Characteristics, set out in the Guide, which it describes are necessary for creating a well-designed place. Otherwise, the Council should adopt a local design guide and refer to that document.

2.4.13 It's important to have a comprehensive masterplan and clarity in policy to what that masterplan should include. It's important for the Council to align to the Building Better

Beautiful Commission and support better design and style, as well as continued engagement for Gloucestershire Manual for Streets.

CP5 - Environmental Development Principles for Strategic Sites

- 2.4.14 CFL supports the improvement of building quality and minimising environmental impact from developments, subject to balancing the need for sites to be deliverable.

CP6 - Infrastructure and Developer Contributions

- 2.4.15 CFL supports the delivery infrastructure at the right time to support the development strategy. As previously set out, it will be important for the Council to ensure that development at Sharpness is supported by timely infrastructure delivery, which should be reflected in regular reviews of the Infrastructure Delivery Plan.

Draft Vision for Gloucester Rural Fringe

- 2.4.16 Once all allocations south of Gloucester are fully developed there will be over 3,500 new homes and employment (planned and emerging) immediately adjacent the urban edge of Gloucester/Quedgeley, which is a large urban area/city.
- 2.4.17 The vision describes the Gloucester fringe as rural in character. However, once all allocations are developed, CFL views Hunts Grove as being part of the Gloucester/Quedgeley urban area – rather than on the ‘rural fringe’ – and this should be reflected in the future vision for South of Gloucester. There are of course other parts within this geographical area that remain of rural character beyond Hunts Grove and these should also be reflected in the vision for South of Gloucester.
- 2.4.18 Part of the reason for seeking this change is to recognise that this part of Stroud District has and will continue to develop socially and economically, and the development plan should positively encourage and support it. Referring to it as a rural fringe is no longer an appropriate response to help these communities to thrive.

DHC2 - Sustainable Rural Communities

- 2.4.19 Policy DHC2 sets out that small housing schemes of up to 9 dwellings will be supported outside settlement development limits at designated Tier 4 settlements.
- 2.4.20 There is no apparent national or local justification for specifying that growth at smaller settlement should be limited to 9 dwellings in all cases. This does not respond to the individual needs of local communities in anything other than a restrictive and numeric manner. There is no material link with sustainability, which is what the policy suggests is its objective.
- 2.4.21 Small scale development adjacent villages should be allowed to support existing community facilities and enhance the vitality of smaller settlements. Please see paras 2.3.12 – 2.3.18 for comments relating to Haresfield and Tier 4 settlements.
- 2.4.22 Two issues arise that for sustainability reasons need to be reviewed:
- 2.4.23 Settlement Boundaries: these are blunt tools whose purpose is often to prevent organic and responsive growth over a plan period. They rarely keep pace with changing local circumstances. A sound approach would be to replace settlement boundaries with a criterion-based policy for villages that allows for proportionate growth where it benefits a local need, whether economic, social or environmental.
- 2.4.24 Numerical Limitation: CLF would suggest that rather than place a specific limit of housing growth at each village, a sustainable response would be to target ‘proportionate growth’ or

'growth that needs a specific local need'. It is not the intention of these changes to materially alter the spatial strategy.

- 2.4.25 It is suggested therefore, that the policy is amended to provide an evidenced based approach to proportionate growth at villages or where there is a demonstrable need. Such an approach has recently been endorsed in Daventry by the Local Plan Inspector.

DHC6 – Protection of Existing Open Spaces and Built and Indoor Sports Facilities

- 2.4.26 CFL supports the protection of existing open spaces and sport facilities and recognises that any replacement facility should be reprovided with a net benefit to the community.

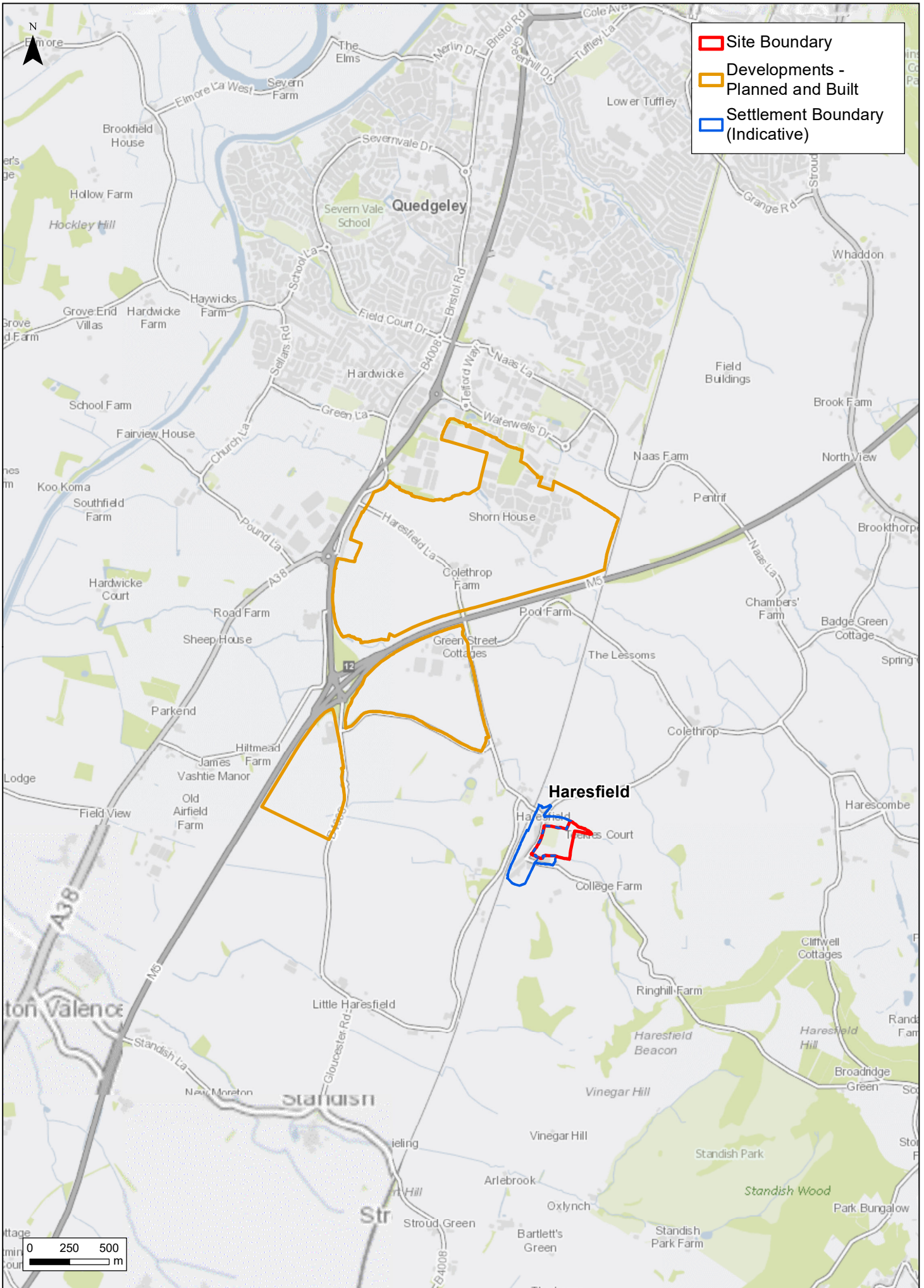
CP11 & EI1 - Employment – page 164 & 167

- 2.4.27 These policies are relevant to the allocation at Quedgeley Trading Estate East (Site EK15), which is supported by CFL, subject to the remainder of this Representation.
- 2.4.28 CFL supports employment growth in this location and especially a further extension to Quedgeley East Business Park (beyond that which has planning permission). At this stage it is suggested that further growth may take the form of a mixed-use proposal as this would create a more balanced development on the south side of the M5, which would respect Haresfield and the surrounding area.
- 2.4.29 Not everyone will live and work in the same settlement/location, so access to a range of travel modes is important to support the economy. Hunts Grove, Quedgeley East and Haresfield are all well placed within the A38/M5 corridor.
- 2.4.30 Homebuilding makes a major contribution to the economy and in this case, over the lifetime of a plan, development south of Gloucester would be a significant employer contributing significantly to the local GVA.

3 Conclusions

- 3.1.1 Overall, Colethrop Farm Limited supports Stroud District Council in its continued production of the Local Plan. It is positive that the draft Local Plan has addressed the role of new settlements and is flexible, rather than over-prescriptive, to encourage development delivery.
- 3.1.2 Site plans have previously been submitted to Stroud District Council in respect of the Call for Sites process identifying land controlled by CFL. Should the Council seek further clarification, this can be provided.

Appendix A CFL Landownership in Haresfield



Site Boundary
Developments - Planned and Built
Settlement Boundary (Indicative)



Client:
 Colethrop Farm Ltd.

CFL Land Ownership

Contains OS data © Crown Copyright and database right 2019

1:30,000 @ A4
 Date: 21/01/2020
 Drawn: ████
 Checked: ████
 Figure 01 | Rev A