

LEONARD STANLEY

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

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To the Local Plan Review Team
Stroud District Council
Ebley Mill
Stroud
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Local Plan Review - Draft Plan for Consultation November 2019

LSPC is extremely disappointed that little has been done to address their concerns raised in their response (dated 15th January 2019) to the previous consultation for the 'Emerging Strategy' and has several objections to the approach now being put forward.

1) According to page 33 (2.48) states:

"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."

However, this is contradicted on Page 51 under Core Policy CP2 where the key service centres are allocated housing of between 20 and 120; whereas Tier 3a villages of Brimscombe and Thrupp, Kingswood, Leonard Stanley and Whitminster have been allocated between 40 and 190!

As the statement on page 33 is mis-leading, this needs to be removed and replaced by a statement that reflects the true situation.

2) Page 50 under the description for Tier 3a – Accessible Settlement with Local Facilities

"Further development will be focused inside the settlement development limits or **(exceptionally) on the edge of settlements**, subject to meeting criteria set out in the Plan's Core and Delivery policies, and will principally meet specific local housing, employment and community infrastructure needs, with a view to safeguarding or enhancing each settlement's current role, function and accessibility."

The statement of 'exceptionally' permitting development outside the SDL is a green light for developers to manipulate and is open to misinterpretation and therefore is a great risk to villages like Leonard Stanley. Please remove this statement or provide greater clarification or risk losing planning appeals! It is highly likely, that the housing supply in the District will fail to build the numbers required each year; developers will use this woolly statement to justify building of the edge of settlements, encroaching on the Greenfields and losing valuable countryside.

3) Page 153 New Delivery Policy DHC1

“At all settlements with defined settlements development limits, **permission will be granted** for residential development or redevelopment within those defined settlements development limits, subject to the satisfaction of detailed criteria defined for meeting housing need at settlements.”

The statement above goes beyond the NPPF statement of “presumption in favour of sustainable development” and may even fall foul of the three objectives “Economic, Social and Environmental”. It would be helpful to know what the detailed criteria is, please rethink the wording of this new delivery policy.

LSPC is very concerned that this policy will lead to higher density of development within its SDL’s that would otherwise be considered appropriate.

4) Page 151/152 Core Policy CP9 Affordable Housing

“In all other areas, **sites capable of providing 10 or more dwellings (net)**, or covering a site of 0.5 hectares or more, will be required to provide at least 30% affordable housing”

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.”

This is surely in contradiction to the consultation; where communities are in support of more affordable housing – not less. This should be looked at again – what is to prevent developers from requesting several different applications for 9 dwellings and therefore avoid contributing to the need for Affordable Housing?

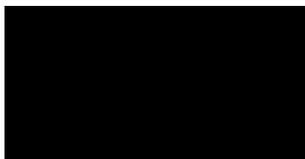
5) Page 154 Delivery Policy HC4 – Local Housing need (exception sites)

“The Council will consider the inclusion of some market housing on these sites where this is required to make the scheme viable. A high level of proof will be required to ensure that the level of market housing is *de minimus*, including consideration of whether Government grant availability could reduce or negate the necessity for market housing.”

LSPC is again deeply concerned that developers will manipulate this policy to build on the outskirts of our village, and once again erode the valuable green space adjoining the SDL. Has the criteria changed for this policy in anyway, as this is not made clear in the consultation?

In conclusion, LSPC is very concerned that the amendments and inclusions of new policies, do little to safeguard the environment and is likely, to erode our countryside and cause intrinsic harm to the character of our village.

LSPC hopes that you will take note of the concerns raised and make the necessary changes.



Copy to: District Cllr Nigel Studdert-Kennedy
District Cllr Steve Lydon