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Please find my comments Comments on SDC draft Local Plan

Unsound classification of Tier level

The reclassification of Painswick from Tier 3 (accessible settlement with limited facilities) to Tier 2 (Service Centre) is unsound being based on source information that is neither current nor correct.

The last time the existing Stroud Local Plan was inspected by Stephen J Pratt in November 2015 he confirmed that Painswick's Tier 3 had been allocated by SDC using a consistent, logical and evidence-based process. The Inspector saw no reason to challenge the analysis in fact he thought it to be an appropriate, effective and soundly based settlement hierarchy.

Comments made in recent desk-based studies produced to inform the draft Local Plan such as the Settlement Role and Function Study update 2018 are based in part on an old survey undertaken in 2009. Incorrect conclusions have therefore been drawn erroneously defining Painswick as a Service Centre and therefore concluding Painswick was similar to Minchinhampton, Berkley and Cam in this regard.

A simple walk around the respective retail offerings of the settlements would clearly demonstrate that an inappropriate conclusion has been drawn by this reliance on outdated and therefore incorrect source data.

Painswick should retain its current status of tier 3 in the Settlement hierarchy.

Habitat Regulations

A Habitat Regulations Assessment of the Stroud Local Plan at Emerging Strategy Stage was prepared by Footprint Ecology in November 2018. This considered the implications of the Plan and site allocations for European wildlife sites in terms of any possible harm to habitats and species. A variety of buffers were devised to screen for potentially significant effects, 5 km for the Cotswolds Beechwoods. Potential site allocations within these areas require appropriate detailed assessments including visitor surveys and potential mitigation strategies to be proposed. Development sites within 5 km of the Cotswolds Beechwood SAC require mitigation measures and although a visitor survey of Cotswolds Beechwood has been undertaken. Mitigation measures have neither been proposed nor agreed. It is for the competent authority to gather the information and evidence necessary for the appropriate assessment to give them certainty that adverse effects will not occur. Fundamentally that therefore means that in the absence of certainty, the plan or project should not normally proceed.

Washwell Field (PS41)

Inclusion of PS 41 runs counter to the stated objectives of the draft Local Plan and does not take account issues raised by supporting documentation.

The vision for the Cotswold Cluster (Page 140) sets out that the Cotswold 'brand' is of key importance economically to the region making it important to cater to high quality tourism needs that are in line with the relative affluence of the region. However, the vision also explains that inclusiveness in this area is important so that all residents feel the benefits of increased tourism. The approval of 20 houses on this site would have for many reasons a negative effect in meeting this aspect of the Cotswold Cluster vision.

