



20th January 2020

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Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud GL5 4UB
Sent by email only to [REDACTED]

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Dear Sir/ Madam

Representations on the Stroud District Local Plan Final Draft

On behalf of my client, [REDACTED], please see below our representations in relation to the Stroud District Local Plan Review Draft Plan. As was set out in previous representations (January 2019), my client currently owns DE Spencer and Sons which is located within the settlement of Nupend, within the parish of Eastington. DE Spencer and Sons is a Civil Engineering Firm who have occupied the site since the 1980's. The owners are looking to retire in the next few years and they are now looking at alternative options on the site, including residential development. The site was previously submitted as part of the Councils 'Call for Sites' in January 2019 (reference: EAS016: SALA November 2019).

Having reviewed the Draft Local Plan, we would like to make comments on the following policies:

Policy DCP1: Delivering Carbon Neutral by 2030

The Councils commitment to becoming carbon neutral is to be commended. However, there are concerns within this policy. As set out at 1.30, Stroud District is predominantly rural District and whilst giving priority to sustainable travel modes is to be praised, without significant investment in the public transport system this is not going to be possible.

The NPPF at paragraph 103 recognises that *"sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision taking"*. As a result, this policy is not considered to accord with the NPPF, and it is recommended that a phased approach is set out across the plans period to becoming zero carbon, whilst acknowledging the rural nature of the District in terms of access to alternative modes of transport.

Policy CP3: Settlement Hierarchy

The need to direct development to larger settlements is typical of the majority of Development Plans, and it is acknowledged that *"the use of previously developed land within settlements will be given substantial weight"*, which is echoed in paragraph 118 of the NPPF. Given the rural nature of the district this should apply to the whole district. Within the NPPF, paragraph 78 encourages planning policies to *"identify opportunities to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby"*. As a result, all brownfield sites should be considered on their



own merits and development in a small settlement should not be discounted just because the settlement does not have a settlement boundary.

The settlement hierarchy should also take into account the changing character of the District as is set out later within this representation.

The Stonehouse Cluster

My client's site is located within the Stonehouse cluster (reference: EAS016). This cluster is described as having a *strong strategic retail role, very good level of community services and facilities, access to key services and facilities, very important employment hub*. There is an existing allocation at Great Oldbury (SA2 in the current Local Plan), and two further allocations to the west of Stonehouse (PS19a and PS20). Once completed, these allocations will significantly change the character of the area and will result in a new primary school, community uses and significant employment opportunities in close proximity to my client's site. As a result, the settlement of Nupend will be seen as much more sustainable.

Policy DHC2: Sustainable Rural Communities

This policy provides opportunities for development adjoining the settlement boundary in tier 4 settlements. It is considered that this policy should be extended to allow for development within brownfield sites adjacent/ that relate well to all settlements including those without a settlement boundary. As has been set out above, my client's site (reference EAS016) is located in the settlement of Nupend. The west of Stonehouse development and proposed allocations will undoubtedly change the character of Nupend and will provide residents with additional facilities and services in close proximity to the settlement.

By including brownfield sites within this, it will further help to support the Government's objective of *"significantly boosting the supply of homes"* (paragraph 59 of the NPPF) and paragraph 118 which states planning policies should *"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs."* Furthermore, the PPG, is clear that *"A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness."* (reference: 67-009-20190722).

Policy CP11: New Employment Development

The need to protect and safeguard employment sites is understood. However, the wording within this policy is far too restrictive, as it does not allow for alternative uses (including residential on the site). The NPPF is clear at paragraph 81(d) that planning policies should be *"flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances"*. This is further echoed at paragraph 121 which sets out that *"LPA's should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs"*. Policy CP11 is not considered to be in line with the NPPF.

There are many different reasons as to why land is no longer suitable for employment uses (both within and outside settlement boundaries) and it is recommended that this part of the policy is reworded to suggest that Employment sites will be retained for these purposes..... *"Unless there is no reasonable prospect of the site being used for*

employment purposes". This would create the flexibility allowed for within the NPPF, and would put the onus on the applicant to justify why employment uses would no longer be suitable for the site.

Policy CP15: A Quality Living and Working Countryside

In relation to point 9, within the policy. As has been set out in detail under the comments in policy DHC2, this should be extended to include brownfield sites which are well related to settlements (even if they do not have a settlement boundary). This would help to provide additional homes within the settlements, and would help to maintain the vitality of rural communities (paragraph 78). There is a real opportunity for the conversion of buildings on brownfield sites to significantly enhance the area.

As has been set out in more detail within policy DES1, and specifically v), this should be extended to include all redundant buildings. The test in line with paragraph 79 of the NPPF should be whether the proposed development would enhance its immediate setting, and not specifically whether the buildings contributes to an established local character. The proposal should consider the development as a whole.

Policy DES1: Conversion of Redundant Agricultural or Forestry Buildings

By limiting this policy to the conversion of redundancy agricultural or forestry buildings only, this policy is far too restrictive. In line with paragraph 79(c) of the NPPF, this should be widened to include all *"redundant or disused buildings"*. Furthermore, the policy is far too restrictive in terms of the hierarchy. The NPPF does not require applicants to demonstrate the most appropriate viable use. The cost of converting buildings is often significantly more than constructing new buildings and as such it is unlikely that the uses set out within the policy would ever be viable.

As a result, this policy should be amended to cover all redundant buildings and section 7 of this policy should be deleted.

I trust that the above will be considered but please do not hesitate to contact me if you require any further information.

Yours faithfully


Senior Planner
For Ridge and Partners LLP