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From: [REDACTED]
Sent: 21 January 2020 17:52
To: WEB Local Plan
Cc: [REDACTED]
Subject: Stroud District Local Plan Review - November 2019 publication

Follow Up Flag: Follow up
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Dear Sir/Madam

Having read through the Document we have been invited to make comments on the consultation document with reference to page numbers, paragraphs etc. We will therefore run through the Local Plan in the same format as that which has been published. In doing so we should say that we have chosen this format rather than using the pro forma questionnaire in the belief that it provides a more precise method of responding.

Page 14 - Priority Issues

It is noted that Stroud DC is moving towards the District being carbon neutral by 2030. What is not clear is the investment needed to existing housing and property stock also with the need to quantify the cost and viability which should not to be the detriment of delivering residential and business space to the District as a whole. This will be highlighted later in this response.

Page 16 – Note 11

The need to tackle the acute lack of affordable housing should be carried out in a manner which is in compliance with National Planning Framework but also where there are willing landowners bring forward affordable housing both under the Exception Policy but also possibly through new initiatives not previously adopted.

Page 18 – Land Use

Reference is made to the provision of Rush Skate Park currently at Brimscombe but with the desire to relocate to Stratford Park environs. We are mindful that there is a problem at Stratford Park with the amount of land available and the green space needed to comply with the Local Plan. Accordingly thought should be given to expanding the community land related to Stratford Park in order to facilitate the relocation of Rush Skate Park.

This is particularly important bearing in mind the goal of seeing Brimscombe Port redeveloped which by implication would necessitate the relocation of the skate park facility.

Page 23 – Strategic Objective SO1

Reference is made to affordable and quality housing for local needs. It is noted within the Consultation documentation that there is a reliance upon major allocations in areas such as Wisloe, Cam, Sharpness and Whaddon. Equally there are areas adjacent to settlements and indeed within some settlements where development should be considered. To do otherwise is to encourage a ‘draw-bridge’ mentality to certain villages and settlements which by implication would encourage house price inflation resulting in those areas becoming less affordable.

Accordingly development should be regarded on its merits related to location and should reflect the housing need which if researched correctly would indicate appreciable demand for mainstream housing as against the preponderance of ‘affordable’ being the phrase used within housing needs surveys thus tilting the end result survey to those properties which are regarded as affordable as against main stream housing which should be affordable but can become unaffordable through protection of spaces in and around existing settlements.

Page 25 – Development Strategy

Reference is made to the four options which were originally subject to consultation in 2017 together with reference to the evolution to what is now described as a ‘hybrid’ which could effectively be Option 5. However Option 5 was

not shown and therefore it is interesting to note how this has come forward without being highlighted as the fifth option.

In our opinion the hybrid option is more akin to No 1. In particular it is interesting to note that the reference in the Options starts off with villages rather than towns and bearing in mind that there are a reasonable number of towns it is questionable whether this description is wholly accurate.

Nonetheless the general feeling which we picked up at public consultation events was that there is a preference to see more dispersal and of course a few larger allocations but at present the current Local Plan does major upon large scale development in certain areas and with dispersal very much limited.

We are mindful that this is possibly encouraged through the amount of land within the District which falls within the Cotswold AONB and therefore encourages development down the M5 and A38 corridor.

Page 26 – Paragraph 2.13

Reference is made to concentrated housing growth on the main towns of Cam, Dursley, Stonehouse and Stroud. We do not find the allocation of housing for Stroud to be particularly concentrated. If that includes the brown field sites such as Brimscombe, Ham Mills, Thrupp and the River Frome corridor then it is noteworthy that these are brown field sites which are difficult to deliver. Easier sites whether green or part green and brown are limited in number within the current consultation papers.

In particular it is noteworthy that Cam and Dursley are subject to wide scale opposition from the public. Also reference to Whaddon does not appear within this section presumably because it is regarded as part of the Joint Core Strategy for Gloucester City and adjoining local authority areas.

Page 27 – Map 2

Bearing in mind the comments on the previous page it should be noted that Stroud is not highlighted as an area for growth.

Page 28 – Paragraph 2.26

This refers to development in certain settlements namely towns and villages with reference in particular to overcoming existing infrastructure deficiencies. It should be noted that to achieve that goal further development will be needed to provide financial viability which by way of example could be highway improvements. Therefore the amount of development should reflect the infrastructure and improvements required as part of the local need whether that be acknowledged through survey or NDP. By way of example the needs of Minchinhampton town have been the subject of scrutiny within the NDP and reference is made by around 80% for certain improvements to the traffic flow within the town and parking and conflict between pedestrians and motorists. It is therefore likely that to achieve those goals development in excess of the numbers put forward may need to be reviewed. In particular it should be remembered that Minchinhampton had an earlier initiative known as Planning for Real which indicated more development but to do so on the back of improvements to traffic/highways etc.

The other paragraphs within Page 28 relate to Cam, Dursley, Newtown, Sharpness and Wisloe. At this stage it is unlikely that all of those allocations can be delivered or indeed confirmed within the eventual Local Plan after the Public Enquiry. Thus an alternative location for major development and/or addition dispersal will need to be brought forward within the emerging process of the Local Plan.

Page 29 – Paragraph 2.34

This focus upon expansion south of the District and relates to a number of areas. In our opinion this form of development can only be considered in conjunction with a new junction on the M5 motorway which by implication would be J13A. This would deliver all of the goals anticipated but may require further development in and around Cam and Dursley to balance the finances required to create viability for such a junction. It is also feasible that this would encourage further housing in and around Berkeley plus possibly a more commercial zone in and around Sharpness.

Page 31 – Paragraph 2.39

The anticipated grading of these new areas as Tier 2 or Tier 3A seem to be out of kilter with the current definitions and examples within the current draft Plan and indeed do not reflect the initial early days prior to further consolidation.

Page 32 – **Location of 8000 new homes**

It is unclear as to the supporting documentation for the small site allowance of 75 units per annum for 18 years totalling 1350 units. It would be helpful to carry out an audit on the existing small sites some of which cannot be delivered for various reasons. Thus the historic track record of small sites and windfall sites is one which is likely to be inaccurate for the next 18 years compared with the last 20 or 30 years.

Page 33 – **Strategic Sites**

Within this page reference is made to housing distribution up to the year 2040. Bearing in mind earlier comments with regard to the likely delivery of some of the major sites it would seem that dispersal in some of the towns and villages highlighted in 2.48 and indeed others within the Local Plan will come forward and need to be tested at this stage.

Page 35 – **Self and Custom built homes**

The draft strategy provides detail on this and we support the delivery on custom built homes within the Stroud District. We believe that further publicity is required to alert the residents of Stroud as to the deliverability of these properties.

It is important to illustrate that self build and custom built are not the same as those which have been seen in the past where a person/group have come together to deliver houses built by themselves often employing trades within the team of people involved. This has occurred right back to the 1970s and is renowned for areas where houses have been built over many years and the location is often untidy and with house/bungalow designs of variable appearances which have not necessarily fitted in with their location.

Nonetheless the opportunity provided by self and custom built houses is profound and should be encouraged within the Local Plan.

Page 39 – **Employment needs**

The table provided indicates 61 hectares of new land. Of this 10 hectares is dedicated to Renishaw and therefore the publically available space is 51 hectares. Of that Wisloe, Sharpness, Sharpness Docks, Javelin Park and Quedgeley East extension are all strategic but not necessarily deliverable in the short term.

Moreover it is noteworthy that the only land available within the Stroud influence is Stonehouse north west and Stonehouse Eco Park. Although we believe that the Stonehouse Eco Park will come to fruition it should be noted that this is not available within the initial period of 2021. Indeed there is an acute shortage of employment land within Stroud and we are somewhat intrigued that further allocations in and around Aston Down which is a protected employment space has not been highlighted?

We therefore recommend that a further study is taken of employment needs and that additional land be brought forward if at all possible. It is particularly noteworthy that the demand will be difficult to satisfy due to the terrain of Stroud urban area as once defined. Nonetheless the need is ever present and should be reflected in the final form of the Local Plan.

Page 40 – **Study findings**

The third bullet point is reviewing town centre car parking charges. We believe that this should be done in respect of all towns and villages where car parks are provided. The same also applies to on street parking, access, loading etc plus the need to have residents car parking permits where appropriate.

It is accepted that car parking charges should only be levied in order to improve traffic management within the town or village while at the same time encouraging shoppers. This is particularly important to those towns which have shops within the centre and this should be sustained by encouraging shoppers while at the same time encouraging those who are in town/villages all day long to park sensible and possible share transport into the area of employment.

Page 42 – The draft strategy

It is likely that all of the five towns mentioned should be reviewed and development encouraged which helps sustain the vitality and viability of the centres.

In addition the smaller towns of Berkeley, Minchinhampton, Cam and Painswick should be studied to ensure that the existing retail and service offer is underpinned (as per Page 43).

Page 45 – Strategic Planning & Leisure

Reference is made to Brimscombe Port being a key piece in the Cotswold Canal restoration. The Local Plan does not provide any assurance that the canal will be navigable between Saul Junction and Brimscombe Port. Until such time as the canal is navigable between those two points it is unlikely that Brimscombe Port can be delivered without a sizeable subsidy from HCA.

As far as track and field training is mentioned it should be remembered that this was offered as part of a Planning Application at Bond's Mill some years ago and was rejected by Stroud District Council. It is therefore essential that Stroud District Council is aware within major development that the planning gain for an athletic track and possibly indoor tennis facility should be on the agenda.

Stroud & District Athletic Club enjoys a very high reputation within the country and was home to an Olympian in previous years. It would therefore be sensible to adopt a more proactive initiative to see where such facilities could be brought forward and then delivered to the District.

Bearing in mind the amount of development which has been proposed in and adjacent to the A38 and M5 corridor it would seem sensible that this is brought forward during this process.

Page 46 – Restoration of the derelict canal...

In our opinion this is crucial to delivery of the current and emerging Stroud District Local Plan. A number of sites are either adjacent to or close by the canal whether that be the original Thames & Severn or the Stroudwater Canal all require the completion of the restoration project. Therefore the Bid to secure the funding for Phase 1B of the canal project should be integral to this Plan.

In the event of the bid or financial delivery proves negative then some of the sites highlighted within the current Local Plan are unlikely to be delivered. Therefore development in and adjacent to the canal should be encouraged where possibly Section 106 monies and /or CIL can be brought forward as part of the matched funding where appropriate to the canal restoration scheme.

Page 47 – Delivering carbon neutral by 2030

We are concerned that the delivery of this objective is unlikely to be satisfied within the allocation of housing in and around Wisloe and Sharpness. It is noteworthy from previous 'new towns' which occurred in the 70s and 80s that in the first instance the building of houses comes first and that the initial residents commute to their place of work during the early part of the settlement being created. Thus the employment which is needed to make the development sustainable from a carbon neutrality point of view is difficult. The alternative which is to provide employment first and the houses second is equally flawed whereby workers commute to the new employment location prior to being able to move to the same area.

Thus the aim of achieving a new 'garden village' which is sustainable in terms of both residential location and employment is incredibly hard to achieve. This is particularly so where there might be hesitation from house buyers to move to a location which historically has not been well regarded whether that be for shops, education or transport links.

It is for this reason that many developments are adjacent to well established settlements and the best example of work in hand is the new housing area west of Stonehouse which although similar in nature is at least sustainable in its proximity to Stonehouse.

It the circumstances the Core Policy DCP1 is very laudable but may be tested during the Public Enquiry proceedings as to whether it is viable.

Page 48/49 – **Strategic Growth**

We have already mentioned that the delivery of employment land in locations such as Wisloe, Sharpness, Sharpness Docks etc is questionable in the period 2021-26. It is noteworthy that the number of housing units allocated as per current date. In particular the numbers for Stroud, Stonehouse and Nailsworth seem remarkably modest. Moreover we are aware that some of Stroud is an allocation on brown field sites which at present may be undeliverable.

It is therefore likely that the delivery of houses within the next plan period cross referenced to the five year land supply will need to be thoroughly investigated as part of the process in coming up with the correct allocation and calculations for the sites.

In the circumstances the review of the settlement defined boundaries is worthy of further work.

Page 48/49 – **Core Policy CP3**

The analysis of projected cumulative total for the ten settlements seem to be somewhat arbitrary. We recommend that a more objective formula is used. By way of example there does not appear to be consistency in the quotas when comparing Stroud with Nailsworth.

Page 50 – **Core Policy CP3**

We are mindful that within this response to the Consultation that further development could take place in and around certain villages which could change the status of the Tier related to that settlement. In addition it is sensible to review those areas which could be brought forward as a settlement in the same way as Miserden has now been included. An obvious example would be the area of Bownham which is sandwiched between Amberley, Rodborough and the lower part of the valley with Brimscombe and Thrupp.

Page 52 - **Settlements Hierarchy**

The examples of the hierarchy shown on centres 2, 3 and 4 is worthy of further consideration with particular regard to where there is an advantage such as Chalford, Eastcombe and Bussage where development adjacent to the settlement boundary could/should be considered whereby improvements in employment (thus enhancing sustainability) and highways/pedestrian matters.

The question of employment provision is particularly important by virtue of the Policy which aims at carbon neutrality for 2030. It is acknowledged that there is a large amount of out commuting within the Stroud District and therefore employment provision whether that be limited or live/work or sympathetic to the setting should be considered within this sensible criteria as shown.

Page 54 – **Core Policy CP5**

The criteria set out on this page is sensible but needs to be cross referenced to viability and the reality of the actual delivery of the end result.

Page 59 – **Vision Diagrams**

Assuming that the development potential for some of the towns and villages within the different clusters might be reviewed it is likely that the schedule per cluster will need to be reviewed during this process. Equally there are certain irregularities such as Chalford which really includes France Lynch but the boundary may not be in accordance with that fact.

It would therefore be sensible for the boundaries defined for each settlement to be more precise than that which is currently available to the public. This could also encourage the other settlements to have an SDL similar in nature to Miserden.

Page 61- **Developing a vision for the future**

Bullet Point No 5 which is Maintaining and Improving the Vitality of Stroud Town Centre including managing the night time economy is greatly acknowledged. It is noteworthy that URBED carried out a survey in conjunction with

Stroud District Council some years ago and made recommendations to encourage the night time economy. Those recommendations have not been followed. Moreover the more recent report prepared by Mr Lowin also ignored this point which needs to be resurrected.

Historically there is no undue opposition to providing better access to the town centre by car, bicycle and foot for the evening and weekend economies. Moreover with the majority of properties within the town centre now including residential accommodation there is a vast population within the town who would appreciate easier access at night and weekend hours. We therefore recommend that the URBED report is updated and for the new Traffic Regulation Order should reflect the ease of access to the town centre. Not only would this underpin the vitality and viability of the town centre it would also provide a high degree of security where the public would be more voluminous than we see at present.

Page 63 – Amberley

WE have already mentioned that settlement boundaries should be drawn for other areas such as Bownham. This page shows the peculiarity that Theescombe and St Chloe plus Lower Littleworth are not shown as a settlement. This is particularly unusual insofar as one part of Amberley centred to the south upon Spriggs Well is included but Theescombe and Amberley is not. Therefore a degree of consistency is recommended.

Page 66 – Chalford

Reference has already been made to the peculiarity of France Lynch and Chalford being shown separately.

Page 68 – Manor Village (Bussage)

Again the boundaries as shown are somewhat odd and in particular Brownhill has been excluded from Bussage which is bizarre given the similarity in density to both.

We have already mentioned that there should be a review of the boundaries which effectively take on board Eastcombe, Bussage, Manor Village, Chalford and France Lynch.

Page 69 – Minchinhampton

We support the allocation of land at Glebe Farm and Tobacconist Farm (PS05) which is currently for delivery of 80 residential properties (as per Page 70).

We believe that Minchinhampton has historically requested certain infrastructure items and therefore thought should be given to increasing the density in order to improve the viability of the scheme and therefore the ability to deliver more benefits to the town being in accord with the NDP. We confirm that historically four out of five people have complained about the town centre with regard to parking and the conflict between pedestrians and motorists within the central area.

In addition we are aware that a previous allocation was considered on the field known as Ditchyat on the Cirencester Road. If as would seem likely the development of the new medical centre will be confirmed in Cirencester Road it would seem sensible that the allocation for further housing on the same road is encouraged to the benefit of the town noting earlier comments on infrastructure.

Secondly the Ditchyat allocation is coming forward through self build and custom build housing which is in accord with the Local Plan and seemingly is essential to provide the requisite number of plots being an integral part of the Local Plan and the drive by Central Government in the availability of self-build plots.

Page 71 – Nailsworth

We draw to your attention that the Consent for houses in Pike Lane is not included and this will change the SDL to the eastern part of the Newmarket Valley.

Page 74 – Stroud

Reference on this Page is to PS10 which is the provision of 75 dwellings on land at Cheapside although there is ambiguity to the word railway land. It is essential that the car park capacity is not denuded and that any development should take place on that which is effectively unusable for parking or underpinning of the economic vitality and viability of the town centre. In particular we would suggest that the development in and around Hill Paul

known as the Cheapside development should be encouraged to run along the canal side effectively with a wharf type development of residential properties which could deliver up to 75 units without the reduction in any car parking spaces. At the same time this would enhance the stability of the bank and the possible renewal of the foul water sewer which was damaged some years ago.

PS11

It is noted that the railway viaduct is adjacent to the site and we believe this to be a more commercial plot than a residential site given the vibration from the railway line.

PS12

The potential for redeveloping the Police station and Magistrates Court is particularly attractive in that a Landmark building can be created within the site and possibly for a new Police station to be provided either on part of the site or elsewhere in the town. Clearly the two aspects need to go together.

PS13

The Central River / Canal Corridor is a scheme known to us and likely to delivery more than 120 dwellings if dealt with comprehensively and to the benefit of the area in the delivery of green spaces, new waterside settings and employment which can underpin the new housing.

The development strategy refers to development adjacent to the SDL and we believe that this should be investigated more fully mindful of previous sites promoted during earlier consultation papers in respect of Stroud town. Noting therefore previous sites considered we believe that the locations known as :- STR035; STR023; STR038; STR039; STR040; STR037 (eastern portion); STR031; STR021; STR 041; STR022; STR043 (north east); STR046

It should be noted that this is a relatively long list of areas which have been considered in the past. We do not believe that these are all worthy of major allocations but in some cases there are benefits which can be derived whereby development on a few locations delivering maybe up to and around 1000 dwellings (arranged over a number of sites) can be delivered.

Moreover the delivery of those which are within an easy walk of Stroud town centre should be seen as desirable in the vitality and viability of the town centre being underpinned. This is particularly relevant given the Bid in 2019 by Stroud District Council and Stroud Town Council in conjunction with Dransfield for a grant by the High Street Fund (Central Government) to support the town centre.

It was noted during this process that the amount of development on the edge of the immediate town centre location was minimal (e.g. Stroud NDP). This was regarded as a weak spot in the approach in making the bid to Central Government. We therefore recommend that a further review is taken of all of the sites to see what is any can be brought forward to the benefit of delivering improvements to the infrastructure and green spaces for the town centre.

Page 77 – Stroud

PS13 has been referred to in earlier paragraphs but in particular we bring to your notice that the delivery of redevelopment to Lodgemore Mill is questionable and indeed dangerous from an employment provision point of view. This is an important employment provision within the town centre and should not be jeopardised by a theoretical allocation for redevelopment. WSP who are the successors to the earlier textile companies have an international status which should not be undermined by the inclusion of this land.

It is accepted that the canal corridor from Hopsons Yard through past the Severn Trent pumping station and the inclusion of the land behind the Telephone Exchange plus that between Lodgemore Lane and Chestnut Lane possibly to include but not necessarily the Wicliffe Ind Est or the previous Marling School playing field extension. It is likely that this development will be phased and therefore the provision of 120 dwellings is feasible within a reduction to the area shown. If the area shown was to be redeveloped it is likely that around 500 dwellings could be provided. Unfortunately that would be the demise of companies where employment is critical and dare we say in line with carbon neutrality in sustainable employment being within walking distance of residents living within Stroud town.

Page 82 – Eastington

It is surprising that the employment space to the north west of Eastington village is not shown as part of the village boundary. Equally there is inconsistency in the non inclusion of the housing to the south west which is no different for example between the two parts of Amberley as shown in the current defined village boundaries.

Page 84 – Leonard Stanley

The allocation of housing on PS42 is sensible in that it removes a certain inconsistency in the development boundary which by inclusion provides sustainable development within the village. The same is also true of PS16.

Page 88 – Stonehouse

PS19A is the allocation of housing north west of Stonehouse. Unfortunately the proposal is not overly clear as to its relationship between Great Oldbury, the railway line and any improvement to railway services in the future not to mention existing access to the settlement of Stonehouse in the immediate future.

Page 89 – Stonehouse

PS20 is the development of J13 which invariably is called the Eco Park and/or the football stadium. It is noteworthy that the red line is different to that which was used for the planning application for the stadium. This is particularly relevant given the reinstatement of the canal west of Pike Lock up to the M5 motorway and beyond.

Thus the development of this area as a whole should be encouraged with the end result of delivering the canal restoration project. It is worth repeating that the restoration of the canal from Saul Junction to Brimscombe Port should be seen as an integral part of the economic vitality of the Stroud District as a whole and integral to the Local Plan.

Page 90 – Selsley & Middleyard

Limited development in and around Selsley should be encouraged on the basis that this is possibly worthy of promotion within the Settlement Hierarchy.

Page 95 – Cam

PS24 is the development west of Draycott which does make complete sense with regard to its relationship with the ever increasing Cam settlement. However one needs to put forward an important caveat which is that PS37 (Wisloe) should not be seen to connect with Cam. Indeed it is debateable whether the allocation for Wisloe through its coalescence with Cam and Cambridge is sensible.

Page 105 – Hardwicke & Hunts Grove

In general terms there is no objection to these allocations except that the delivery of housing numbers need to be checked on the basis that the demand for houses on the south side of Gloucester and indeed elsewhere to the north and east is questionable. Thus there should not be reliance upon the housing numbers and phasing until they are scrutinised and supported by evidence with regard to the completions of houses built over the last 20 years.

Page 111 – Land at Whaddon

It would appear that this was brought forward as part of Stroud District Council's provision of housing land in respect of the Joint Core Strategy which historically has been addressed by Gloucester City Council, Tewkesbury Borough Council and Cheltenham Borough Council. The delivery of schemes in and around Gloucester, Cheltenham and Tewkesbury need to be monitored with particular regard to delivery. This is particularly important where there may be double accounting in the delivery of housing numbers in areas such as Hardwick, Quedgeley, Whaddon and Brockworth. It should be noted that this allocation is not supportive of the 'Stroud Economy'.

Page 116 – Berkeley

PS33 includes land which is prone to flooding and even on upper land could exacerbate flooding lower down.

Page 117 - Newtown and Sharpness

It is noteworthy that the development of Sharpness is now of such magnitude that it is coalescing with Berkeley. In the circumstances it would seem sensible for there to be an environmental impact assessment covering the usual criteria plus reference to nitrate neutrality. Noting in particular the close proximity to the River Severn and the water courses leading into it.

Moreover we repeat an earlier comment which is that the delivery of development in and around Berkeley as a Garden Type Village is questionable and could act as a magnet to commuters from North Bristol who have found Thornbury and environs either difficult to find a house or difficult in price terms thus moving further north up the M5 Motorway.

Page 120 – Sharpness Garden Village

The earlier reference to this development being subject to an environmental impact assessment is particularly important today given the question mark on nitrate neutrality as highlighted in the south east of England.

Page 122 – Wisloe Garden Village

In our opinion this allocation is wrong. We say that by virtue of its proximity to Cam and its inevitably coalescence physically between Wisloe between a garden village and Cam to the south. Moreover it acts as the glue between Cam, Cambridge and Slimbridge which in itself would be peculiar given the current connection between Cam and Dursley. Thus the coalescence would go further south and east making a major settlement effectively with suburbs of Slimbridge, Wisloe and Cambridge.

Reference has already been made to any development of this magnitude should be in conjunction with an improved junction on the motorway namely 13A which could possibly be used as a springboard for other strategic infrastructure items. In particular we note that the 50 year plan has referred to the reinstatement of a bridge from Sharpness to Lydney and this in itself if ever to be viable should be in conjunction with a new junction of 13A on the M5 motorway.

In the circumstances therefore it may be sensible to bring forward a strategic review of the roads, highway and housing assuming there might be a link between Lydney, Sharpness and by implication Cam/Dursley.

Such a review should reflect the obvious qualitative check on the settlements of Cambridge, Slimbridge and environs including Gossington. At the same time one needs to be mindful of the international importance of the Slimbridge Wetland Centre and the River Severn.

Thus an Environment Impact Assessment should be carried out on the whole of this area to ensure that the integrity of the location is not disadvantaged. We therefore repeat that a more comprehensive survey should be carried out on this area with a possible allocation of housing to be brought forward not for this review but for the next few view five years or even 10 years hence. This is particularly important given the quest for carbon neutrality, the likelihood that modes of transportation will change over the next 10, 20 and 30 years. Thus the interconnection with the railway line at Cam is significant in this instance together with that which could occur north of Stonehouse where maybe a parkway station could be created. At the same time but on a different page within the Consultation copy is the question mark on the reinstatement of a railway station on the existing Bristol to Gloucester line at Stonehouse adjacent to Stonehouse Court hotel.

Page 130 - Whitminster

In view of our comments on other allocations such as Sharpness and Wisloe we believe that further consideration should be made to development in and around Whitminster. It is noteworthy that employment provision to the south with Highfield Garden Centre and Attwools to the east of the A38 is totally ignored within the Settlement Boundary. This is an important area to the economic wellbeing of Stroud and valleys. Moreover it is well connected to Stonehouse and Stroud and could be seen as a potential location for an allocation of housing well away from the River Severn and unlikely to exasperate the environment of the Severn Estuary.

Page 136 – Kingswood

A simple paragraph in this instance to state that PS47 is employment land for Renishaw and therefore should not be regarded as publically available to any third party enterprise.

Page 142 – Bisley

We are mindful that the highway running through south to north is substandard and it is feasible that a limited amount of development to the east of the village could be brought forward which could be designed to ease the traffic problems within the village centre. This is not an item which is site specific but is an item which is worthy of further consideration if the residents of the village so thought prudent.

Page 143 – Miserden

It is interesting to note that this village has now been included as a Settlement within the Stroud District Local Plan. It is modest in nature and we therefore commend Stroud District Council in providing a defined boundary to the settlement. However we believe that there are other areas such as Bournes Green, Bownham, Theescombe, St Chloe and others which should be equally defined.

This is particularly important as without the boundary some of these ‘settlements’ are considered to be in open countryside whereas in reality invariably they are not.

Page 146 – Painswick

The provision of housing on Washwell Fields is to be recommended. It is interesting to note that development which has taken place over the last 20 years or so include Gyde House, the nurses accommodation and Broadham Fields, all of which are highly visible to the A46. By comparison Washwell Fields is not visible to a public highway (road) although it has some visibility from Bulls Cross. In terms of sustainability it is more centrally located than either Gyde House or Broadham fields. During a much earlier period of consultation Painswick Parish Council brought forward a number of sites for consideration including Washwell Fields. At the time Painswick Parish Council supported this allocation and Gyde House but neither the nurses accommodation or Broadham Fields. Perversely those sites were selected for various reasons and Washwell Fields has been left in abeyance.

In terms of deliverability and sustainability the site is available within the plan period.

Page 151 – Core Policy CP9

The overall unadjusted need for affordable housing at 425 dwellings per annum is a sad indictment of the amount of development which has taken place in recent years.

In the circumstances it would seem that there is a need to be more pro active on sites using the Exception Policy and for sites which are more viable to provide social housing by way of the normal ratio criteria. It is not unusual for developers to come forward with a viability report which indicates a lower ratio to allow for viability. In the case of brown field sites this may result in nil provision of affordable homes.

Thus landowners of sites on the edge of settlement boundaries and in villages of smaller numbers to be encouraged to come forward with sites for provision of affordable housing. We are mindful that there are a number of charities in the area that would be suitable for such a promotion and we recommend that further consultation takes place with these bodies. We also believe that there will be “new” Government initiatives such as “Discount to Market” will come in to play. The end result being variations on the theme of Affordable (to purchase) Housing and Social (to rent) Housing.

Page 153 – Delivery Policy DHC2

We applaud this policy and believe that there should be publicity given to the ability to deliver dwellings of this scale to the benefit of all.

Page 154 – Policy HC3 and HC4

Policy HC3 should be underpinned by allocations within the Local Plan for sites either including self build and custom built houses or indeed exclusively of that category. It is likely that schemes could come forward with a mix of 50/50 and could be centred upon provision of affordable homes. Indeed thought should be given to the Exception Policy being broadened to provide self build and custom built within that description. We are mindful that main stream Developers are not comfortable with the concept of Custom Built Housing as part of the Strategic allocation.

Local housing need to come forward as part of Exception sites should be encouraged.

Page 155 – Policy DHC3 Live/work development

This use category has been spoken about for years and has failed to deliver on a regular basis.

Historically live/work was created or encouraged with properties invariably having a second building such as a coach house, garage or workshop. Thus the ability to have a home plus a place of business was to be found in the 70s-90s.

Unfortunately that type of property has virtually disappeared due to the additional building being converted either to a separate dwelling or some other form of development. In recent times the phrase live/work which has been used and by way of example was included in the first application on Rooksmoor Mills. Other names include Atelier. Although there is theoretical and potential demand for this type of property the ability to purchase is almost impossible.

By virtue of Government restrictions the buyer of a mixed property can be required to have two mortgages and two titles. A commercial space can be purchased by way of a self administered pension fund (SIPP), the residential can be subject to a residential mortgage. There are virtually no mortgagees in this country capable of delivering a mortgage on a property which includes both uses.

We therefore believe pressure should be put upon politicians to allow those with a private pension pot to be able to purchase a property which is both commercial and residential. At the same time building societies and banks should be encouraged to provide a mortgage to a new owner occupying the property both commercially and residentially.

Stroud is a perfect location for live/work units and the ability to deliver this as part of the creative community of the Stroud District is obvious. We therefore believe that the delivery of live/work units should be encouraged within developments where appropriate. Some of these will be those adjacent to the canal where mixed use is part of the planning policy and therefore live/work such as Ham Mills is already in place.

Should the financial institutions move forward and provide this product it is likely that there would be a surge of interest in live/work interest not only in the Stroud District but elsewhere in the UK. Indeed Stroud could be a flagship of national importance.

Page 156 – Policy DHC4

Schemes such as a community land trust of similar is to be encouraged and should/could be seen as part and parcel of the Exception Policy.

Page 160 – DHC7 New Policy

The criteria set out for allocations and delivery of new development is a worthwhile item but one needs to be mindful as to viability of the development which is triggering these planning gains.

Page 168 – Summary of proposed changes to Delivery Policy E12

Paragraph 5.9 provides information on the areas which were previously protected but are now subject to redevelopment and are described in the table provided.

It is particularly important to note that ER4 is likely to remain in Employment Use in its entirety in the foreseeable future and certainly within the next Plan period.

ER5 which is Dudbridge Ind Est has a Consent for a supermarket but it seems difficult to deliver. ER7 Daniels Ind Est, again has a planning Consent but may not be viable.

In the case of sites of ER5 and ER7 it is likely that fresh applicants will be forthcoming in the foreseeable future. At this stage we would like to comment upon the phrase 'mixed use'. There is a tendency to see these sites as areas which have some employment but also housing. The loss of so much protected employment space such as Brimscombe Port, Bath Road Ind Est and the like has resulted in a major reduction in employment space within the Stroud (urban) area.

We have already commented that there is a shortage of employment provision and employment land within the current Local Plan and as such we urge caution on the development which comes forward within the areas previously protected. Moreover there are some protected sites such as Libbys Drive which is of questionable validity in the long term. That said there are no plans of which we are aware for development in that area on the basis that the space is fully occupied and enjoys a very sustainable number of enterprises at present.

ER8 Stafford Mill Ind Est is shown although seemingly it is enjoying the same level of employment as it has for many years.

ER9 Lodgemore and Fromehall Mills is included although there are no plans whatsoever for Lodgemore Mill to be redeveloped. Fromehall Mills is likely part of a comprehensive development in/adjacent to the Stroudwater canal but at this stage the change of use from commercial to residential in respect of the Listed buildings is probably towards the end of the next Plan period.

Finally we are uncertain as to why Brimscombe Port is not shown as a regenerated existing employment site?

Page 169 – **Policy E15**

Criteria for by way of example a recent application at Hyde Garage to accommodate Stroud Farm Services in their relocation from Chalford to Hyde has been refused. The current Policy is not dissimilar to the proposed one but it should be stressed that encouragement should be given to local businesses which are expanding within what is deemed to be open countryside, especially where the phrase open countryside is not correct. By way of example Hyde Garage is on a road which includes Hyde Garage itself, Gardiners and other tenants at the old Hampton Stone site and almost opposite RDS (Topcon). Gypsy Lane with ATC and of course Aston Down Business Park plus the adjacent former architectural reclamation yard.

Accordingly the description of open countryside should be tested as there is a clear difference between true open countryside as against that which is already a location for businesses.

In the circumstances it would seem sensible for Policy E15 to be revisited to see how it would address a problem such as Stroud Farm Services which requires a relocation to the benefit of those in and around Chalford Ind Est and particularly those driving along the A419 at Chalford bottom.

Pages 179 & 180 – **Core Policy CP15**

This runs on quite nicely from the previous comment on Aston Down and Stroud Farm Services. The criteria contained within Policy CP15 is incredibly restrictive and should be revisited to reflect the actuality of applications.

Page 181 – **Delivery Policy ES1**

We have already referred to the problems in complying with the goal of carbon neutrality by 2030. The criteria and requirements should be encouraged but need to be mindful as to viability of development projects. If there is a risk that the criteria is to the detriment of viability it is likely that the number of dwellings being delivered will reduce. In doing so the 5 year land supply will be questionable and this will be used by Developers to promote sites which may or may not be in accord with the Local Plan but succeed by virtue of the land supply being inadequate to comply with the numbers flagged up both by Central Government and within the current Local Plan at that time.

Page 190 – **Delivery Policy ES16**

It is particularly noteworthy that this is a sensible policy where appropriate. Given the creative hub which is Stroud town and valleys the inclusion of public art within developments should be encouraged. Moreover an obvious example which should be encouraged at this stage is the regeneration of the Merrywalks shopping centre now known as the Five Valleys shopping centre. There could be no better example of where public art should be on display.

There are other pockets within the Stroud District which should also be considered for the location of public art.

Page 193 – **Delivery of houses**

Naturally this will need to be reviewed as the sites mentioned are either included or excluded in the next edition of the Local Plan. In particular reference should be consistent with the current allocations such as west of Stonehouse and as such it would be helpful to list the commitments of 2019, site by site so that there is transparency in these numbers. Moreover the additional numbers for Great Oldbury should be clarified.

Page 194 – **Monitoring framework**

We have already mentioned our criticism of employment land provision thus monitoring of that should take place at the earliest opportunity. A thorough Survey of businesses and requirements should be instigated at the earliest opportunity.

Page 209 – Appendix C

Development in town centres should make provision for waste management to be included in planning applications to minimize the use of the highway and footpaths for locating wheelie bins, recycling measures etc.

It is hoped that by adopting the format of this email that we have clearly set out our response to the current Consultation documentation of the Emerging Stroud District Local Plan. If however further clarification or amplification is needed please do not hesitate to contact the writer.

Yours faithfully

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