

**Please consider these comments provided in relation to the Emerging Strategy of Stroud District Council
Draft Local Plan:**

General Review.

Answers to the overall purpose of the consultation:

- I do not support the Council's preferred strategy.
- I believe there are significant issues and constraints with some of the proposed sites.
- The issues and constraints should be addressed by modification and/or removal of the challenged sites.
- A change in policy to reflect more accurately the preferences expressed by residents in the various consultations should be followed and supported in the document text.

Numbers. The need for housing and government efforts to address the supply and affordability challenge is accepted. However, the current draft plan goes well beyond ensuring there is an adequate margin over the minimum (and this minimum number is increasingly called into question by continual falls in ONS estimates). The proposed allocation numbers excluding Small Sites windfall is currently 8725. This is already nearly a 10% margin over minimum which appears excessive in light of falling estimates of housing required. It would seem reasonable therefore, to set a total figure of 13400 rather than the 13948 proposed and, as discussed in NPPF para 70, include a reasonable proportion of the Small Sites windfall figure in the total required as has been permitted and accommodated at inspection previously. Allowing 1000 from the windfall numbers of 1350 and reducing the residual requirement with buffer to 8400 (minimum residual requirement plus 5%) would result in a total new requirement from proposed sites, including local development, of 7177. The additional remaining windfall of 350 would provide a further buffer.

Dispersal. This was a favoured strategy in one form or another in previous public consultations. This should have formed the core of an updated Local Plan alongside a degree of concentration. Dispersal is recognised as a way of supporting local builders, maintaining community sustainability, preserving a rural sense of place, diversifying housing type and providing a mechanism to speed up housing delivery. Widespread dispersal on very small sites of less than 1 hectare is a requirement of the NPPF para 68 in order to achieve these aims and more. The Stroud Sustainability Report para 3.47 states 'To help diversify opportunities for builders, promote a better mix of site sizes and increase the number of schemes that can be built out quickly to meet housing need, the NPPF states that at least 10% of the sites allocated for housing through a local authorities plan should be half a hectare or smaller'. The NPPF and Sustainability Appraisal differ in the size of site that meets this requirement but current proposals in the draft plan appear to indicate a maximum of 85 houses, just over 1%, on allocated sites of 1 hectare or less (assuming max 30 houses per hectare). The requirement is very clear that these sites must be proactively allocated. Counting windfall against this target is not compliant with this policy requirement.

Larger scale dispersal has also been a missed opportunity within these draft proposals. A wide range of sites have been put forward for consideration. Many of these were either not assessed because they are beyond Tier 3 or rejected on landscape grounds that now, when compared with the landscape damage potentially associated with other strategic sites, pale to insignificance. This approach and these sites must be revisited. Some of these sites provide the potential opportunity for timely build out by smaller developers to bridge the gap where larger sites require longer lead times for planning and infrastructure preparation. These sites would tend to support local builders and developers with consequent benefits to local suppliers, contractors and employment. Dispersal proposals discussed previously are supported by a majority of residents, communities and councillors. Many have been dismissed on tenuous grounds because they did not align with strategic planners favoured strategy of growth points and concentration. These need to be revisited as a matter of urgency in order to meet the aspirations of Stroud District residents, to augment housing supply, reduce pressure on inappropriate proposed strategic sites and to help avoid rejection of our plan at inspection.

Distribution. Much infrastructure across the district is at or near capacity. With this in mind it seems logical to manage any future pressure by spreading load and planning to limit congestion. The Draft Local Plan fails badly in this regard. Almost 80% of the proposed development is located in the far south of the district. On its own, this approach would raise questions regarding the proposal efficacy. However, whilst some existing or approved development will influence the north of the district this is dwarfed by proposals in the south. Despite the West of England Combine Authorities plan being rejected there is still enormous existing and planned development that will come forward in the environs of Stroud Districts southern border. Thornbury has 800 approved in its existing plan and Yate has 3000. Further development at Thornbury, Charfield, Falfield and Wickwar is proposed, approved or already taking place with no commensurate improvement to M5 Junction 14, Almondsbury Interchange or other local networks. Rebalancing can be achieved through dispersal (see above), reassessment of Tier 4 and 5 sites (see above) and reassessment or removal of strategic sites in the south of the district to reduce numbers and impact.

Sharpness. The largest single allocation proposed in the Draft Plan is at Sharpness. Previous Chief Executive Officer of Stroud District Council, [REDACTED], took the unwise decision to publicly state his desire for this major plan to go ahead and facilitated a range of meetings over a protracted time period to bring potential partners and stakeholders together. Perhaps in light of this there appears to be a degree of assumption that this plan is accepted and welcomed by local people with only detail to resolve. This is far from the case. Residents generally accept the need to play a proportionate part in meeting the housing needs of the wider district. However, the communities in and around Sharpness are dispersed settlements, rural in nature and feel and, by and large, that is how residents wish them to remain. Local Parish and Town Councils are almost unanimous in their opposition to the plans as currently conceived, highlight the potential negative impact on the viability of Berkeley as a local centre, question the viability of locating such development in a comparatively remote location, are concerned that the impact on any potential new affordable housing residents has not been assessed, addressed or understood and express doubt and scepticism regarding the promise of investment and infrastructure improvements. Many local people and a growing dedicated local group, Berkeley and Sharpness Residents Action Group (BaSRAG), are broadly opposed to the plans as described in the consultation document and question the reality of some detail. Potential delivery in advance of any construction of the 'missing road link' between the A38 and the B4066 is a particular concern that has not been effectively addressed. An initial suggestion that this vital piece of infrastructure would be front loaded and funded by access to government supported low interest loans has receded as developers increasingly prioritise reducing their budget by placing complete public reliance on utilising a former rail link as a 'green' transport service to any new development. This is disingenuous. If a development were to go ahead it has been made very clear that rail services would rely on a core population to make the service viable and would not commence until this residential pool existed. In the meantime, construction traffic would need to access the site via road.

It is generally acknowledged that there is a need to recognise a role Sharpness can play in provision of housing as part of the Draft Local Plan. An appropriate revision to the current proposal could maintain the close-knit community that currently exists, avoid creating an isolated urban estate and bring with it infrastructure improvements, including improvement to A38 access, that would be welcomed.

There is a real fear that this Draft Local Plan is at risk of rejection at inspection. Site selection is a critical component in forming a viable plan that meets policy requirements. Many other authorities have failed to clearly demonstrate that a process of site selection was followed based upon genuine preference and attributes of location rather than availability. Sharpness, in particular, despite numerous previous rejections appears to have progressed as the result of a willing landowner, complicit and supportive council Chief Executive and an energetic, determined, patient and persistent agent. This does not bode well for demonstrating even handed site selection on the basis of sustainable, substantive, evidence-based criteria.

Wisloe. Please see separate submission.

Summary. Consultation, we are told, is an essential component in constructing a Local Plan. Feedback on sites, evidence, issues, fears, aspirations, local characteristics, challenges, preferences and experience, we are assured, are carefully considered and reflected as the plan phases progress and consultations are completed. However, an increasingly long list of widespread, perfectly credible ideas and commonly held alternative strategies remain absent from the Draft Local Plan or highly contentious and questionable sites determinately remain. I have raised this anomaly at Council on numerous occasions at Environment Committee and in my role in the Planning Review Panel. The answer given is that planners must be guided by their professional opinion. This bland statement would throw the whole concept of consultation into doubt if that professional training dismisses any and all alternatives put forward. The truth surely lies somewhere between the professional opinion of a very small number of individuals and their need to accommodate the reasonable ambitions and alternatives of the people they serve. It is also worth noting that there are other similar professionals who challenge the draft proposals. Some, but not all of these have vested interests elsewhere but it is reasonable to assume that there is more than one set of ideas to satisfy the competing demands of an inspector and the legitimately held desires of communities we represent, many of whom currently feel somewhat marginalised and ignored.

This draft phase of consultation is the last chance to accommodate the reasonable and legitimate ambitions of local people. Communities have honestly and genuinely engaged with the phases of consultation over many years to reach this critical juncture. A high level of professional judgement will be required to balance the needs for a credible plan that can pass inspection with the widely held, understandable desire of local people to protect their communities. I hope that this balance weighs heavily on the side of the people we currently serve.

On a personal note, whilst I frequently disagree with some of their ideas, proposals and preferences, I would like to thank officers for the advice and help they have provided. The plan will inevitably be challenged by some but on a personal level they have always attempted to deal with my sometimes misguided questions. In particular though, I would like to express sincere thanks to all the Berkeley Vale Ward individuals and groups I have had the pleasure of meeting and speaking with at numerous Local Plan public meetings and on a face to face basis. Your three District Councillors, [REDACTED] and I, have tried to spread the load of this most important piece of work and specialise to some extent on individual components of the plan in order to serve our residents and promote the best, positive and viable future for our area whilst protecting the communities and landscape that make it such a wonderful place to live and work. Development is sometimes only seen in a negative sense. This is wrong and we recognise that carefully planned, proportionate growth can deliver real benefit for existing and new residents whilst preserving the fundamental lifestyle valued by so many. [REDACTED] and I do all still feel that there is a burden of housing numbers in this plan that unfairly, unreasonably and unnecessarily has been placed on the shoulders of Berkeley Vale people. We hope that the myriad of well intentioned, informed and reasoned responses that have been submitted help to shape a plan that meets the competing needs of the Stroud District and our local community.

Haydn Jones

District Councillor - Berkeley Vale Ward