

# Representation for SALA Site Reference WUE001 – Holywell Farm, Wotton Under Edge against the Stroud District Council’s Local Plan Consultation ending 22 January 2020

## 1 INTRODUCTION

Having studied the Stroud District Council’s Draft Local Plan, the preferred strategy it is not wholly supported. Future growth in these modern planning times determines the least course of resistance by directing growth away from AONB areas sited in the east of the district and hence centres the bulk of the proposed strategic growth in the west of the district. This satisfies planning dictation perhaps but may not satisfy where people would prefer to live and reduces choice. This imbalance may be viewed as regrettable but could be argued as being imposed democracy. Some strategic growth alongside current settlements in the west of the district where established infrastructure and matured community already exists would refresh and benefit such settlements. Thus, this document is a representation for the Holywell Farm site at Wotton Under Edge.

## 2. BACKGROUND

Holywell Farm site land has been subject to numerous representations and promotions over many years. This is a legacy interest stemming from the completion of Court Orchard by Trym Construction. Original plans had shown an access intent to extend beyond Court Orchard. Many developers have shown an interest in this site believing that it is the only settlement edge site in Wotton Under Edge that is suitable and sustainable. Hence, they have invested resources in promoting planning requirements in order to satisfy issues raised by Stroud District Council. The site is identified in the SALA 2017 as Site ref: WUE001 and it is still available.

## 3 CASE FOR ALLOCATION

- 3.1 It is recognised that the draft Local Plan explains that the district is virtually split in half with the east being AONB and the West being the Vale lower land extending to the Severn Estuary. Hence, the eastern AONB areas are categorised as being constrained due to its landscape and environment. Thus, the strategic planning narrative preference (2.1.6) for providing homes for the nation within the Stroud District focuses mainly on larger new sites. This in itself is challenging because there is no established infrastructure and thus delivery is more extensive than adding to existing settlements.
- 3.2 The draft Local plan recognises that albeit new homes may be directed away from the east of the district that this has created a skew in the market by forcing higher house prices (2.5.2) in AONB areas. This has limited the opportunities for where people would prefer to live by directing them to where they have to live. This remains until

circumstances change and/or the restricted availability in the east of the district comes to market within the existing housing stock.

- 3.3 It is completely understandable that development in AONB causes harm, particularly if it were in obvious open countryside not close to any other settlement. This level of harm if conveyed in a scalable manner would be categorised as intolerable. However, the expression of harm in many respects is a qualitative dimension in planning terms. Quantifying what is tolerable harm on the edge of AONB settlements that have not been adopted in the Local Plan but supported by Planning Control Officers is not always made clear. However, there have been examples such as the recent development at Horsley that have been supported by the Planning Development Control Officers. This was an edge of minor tier settlement with minor infrastructure, set in AONB and not allocated in the Local Plan and thus not Plan-Led but regarded as having a local need to give supportive weight for approval. This illustrates that development has been supported by the Local Authority recognising that protection of AONB is advisory and that the assessed harm is tolerable. Harm can also occur in non AONB areas.
- 3.4 Local need again appears to be a qualitative decision taker's power that is not always comprehended when comparing sites throughout the district. Local need appears to be in two camps – Strategic identification and occasionally Planning Control support. The bulk of the district's Local need thus seems to fall by the wayside for the east of the district when it comes to the proposed draft Local Plan. Local need for Wotton Under Edge exploded following the 2nd world war and abruptly ceased in the early 1980s. Hence harm in today's planning expression was tolerated during this development period. The town is an historic market town and other than a couple of developments the vernacular historically allowed in modern times is unsympathetic and non-enhancing. This implies that there is already extant visible harm from viewpoints around the town. The architecture in many cases can be described as basic and utilitarian. It is contended that there is still local need for Wotton under Edge but there is little narrative or appetite on this subject from the Parish Council who avert holistic community discussion regarding taking a share of the nation's housing crisis. However, the Parish do recognise the need for affordable housing rather than open market housing and there have been years of publicity regarding siblings of long-established residents being unable to return to their community town of origin. If siblings could be housed close to their parents and their relatives this would have a beneficial impact on the environment in many ways. One example is childcare support from grandparents where less travelling and hence less emissions occur. Another factor illustrating Local Need for Wotton Under Edge is house prices compared to areas outside of AONB. This skew has been recognised in the draft Local Plan as previously mentioned. The Local Plan identifies that some smaller sites like Holywell Farm perhaps may benefit the community with self-build projects (2.18). Finally, an ageing population brings many problems to housing stock and refreshment injected into the town illustrates another Local Need dimension.
- 3.5 The Holywell Farm site is **available** for development by access through the removal of 89, Court Orchard. It is **achievable** by integration with the existing infrastructure. It is deliverable within a modest timescale and it is **suitable** as a minor edge of settlement development which will be sensitively designed, sympathetically laid out

to provide a softened enhancement to the settlement edge. This will counteract the existing level of harm observed and benefit a historic market town by redressing the hasty vernacular following the 2<sup>nd</sup> world war. The development would be sustainable and would **not be classed as a major development**. The report commissioned by Stroud District Council undertaken by White Consultants in 2016 for the parcel of land identified as Wo05 did identify this area as “High/medium sensitivity” other than the land adjacent to the playing field (i.e. Holywell Farm) at the edge of the settlement having a lower sensitivity and thus potential for development. This highly professional statement and viewpoint was qualified that the development would have to be a high quality to improve the settlement edge. This infers by the Local Authority that the current settlement edge is poor vernacular. Developers and promoters of this site would not have shown so much past interest if they believed that significant and intolerable harm would be introduced at the settlement edge. Rather the narrative was the opposite and that harm could be easily and sympathetically mitigated to introduce merit at the settlement edge. In relevant arguments this satisfies **CP14 and CP15**.

3.6 The land at Holywell Farm is low grade agricultural quality and is not networked with any other land to form a commercial use. It is bounded by a settlement edge and the level of harm by a modest development is contended to be manageable and tolerable. The impact would be insignificant, balanced by an opportunity for considerable visual improvement and satisfying a modest Local Need. The contribution to the Local Authority housing need is small but distribution of needed homes at this minor level to a tier 2 town is still considered beneficial.

3.7 All technical constraints have been previously overcome other than the debate regarding the landscape issue. As previously discussed, a revisit to this issue by the Local Authority having already recognised minimal harm through its consultants (White) is deserved. It must be stated that reappraisals by qualified and experienced peers in many walks of life re-conclude previous decisions. This is an opportunity to reappraise and gauge that there is not in fact any significant harm but that there will be a modest visual repair and enhancement to part of the settlement boundary. It is also contended that this is not really development creep into wide open countryside. Buffer zones can be applied to limit the development. It is therefore advocated that there is a strong case for worthy consideration to include minor strategic expansion for Wotton Under Edge. It is proposed that sustainability requirements under for Delivery Policies in particular **ES7** can be met.

#### 4 CONCLUSION

The site at Holywell Farm has been identified in the SALA as potential site for future development and recognises that it is in AONB. The draft Local Plan has not recognised the merits of this site and it is urged that this should be reconsidered and re-evaluated. The site is available by access through 89 Court Orchard. It is suitable as a minor settlement edge development and can be achieved through integration within the tier 2 infrastructure through a sensitive and sympathetic design to mitigate harm and improve the settlement edge vernacular. The development would be sustainable and delivery can be swift. A modest expansion of Wotton Under Edge would provide a wider choice for home

seekers within the district but recognises that the bulk of the district's expansion would be distributed in the west. This representation is in support of the site at Holywell Farm and seeks worthy re-evaluation to support modest and beneficial strategic growth at Wotton Under Edge.