

Stroud Local Plan Review

Draft Plan



January 2020

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1 INTRODUCTION

1.1 Introduction

1.1.1 These representations are submitted by Gladman in response to the current consultation on the Stroud Local Plan Review Draft. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to a decent home and employment opportunities.

1.1.3 Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation.

1.1.4 Through this submission, Gladman have sought to provide our thoughts on a number of the proposed policies and also provided site submissions for land being promoted for residential development.

1.1.5 Gladman submit that the Council will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (2019).

1.2 Context

1.2.1 Stroud Local Plan was adopted in November 2015 and covers the period from 2006 to 2031. The Council are now in the process of undertaking a Local Plan Review (LPR). This new Plan will cover the period up to 2040, providing the policy framework and site allocations for this period.

1.2.2 The revised Framework (2019) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for the LPR to be sound it is fundamental that the Stroud Local Plan Review:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework

2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

2.1.2 The revised Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. Paragraph 16 of the Framework (2019) states that Plans should:

- a) *Be prepared with the objective of contributing to the achievement of sustainable development;*
- b) *Be prepared positively, in a way that is aspirational but deliverable;*
- c) *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

2.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan Review provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay¹.

¹ NPPF – Paragraph 60

- 2.1.4 To be considered sound at Examination the emerging Local Plan Review will need to meet all four of the soundness tests set out in paragraph 35 of the Framework (2019).

2.2 Planning Practice Guidance

- 2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans.

3 LEGAL REQUIREMENTS

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.²
- 3.1.2 The Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process³. The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 3.1.3 The preparation of a SoCG will be of particular importance for Stroud District with regards their relationship with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) authorities and in particular the unmet needs of Gloucester, the scale of these and where they are to be accommodated.
- 3.1.4 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St Albans examinations, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).

² PPG Reference ID: 61-021-20180913

³ PPG Reference ID: 61-001-20180913

3.2.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision-making and scoring should be robust, justified and transparent.

4 THE DEVELOPMENT STRATEGY

4.1 Housing Requirement

- 4.1.1 The Stroud LPR outlines a housing requirement of 12,800 new dwellings over the 20-year plan period, which equates to at least 638 homes per year. This housing requirement is based on the recent Gloucestershire Local Housing Needs Assessment (LHNA) and represents a 40% increase on the annualised requirement as set out in the current Local Plan which is 456pa.
- 4.1.2 Gladman are supportive of the Council working with the other Gloucestershire authorities to determine the housing needs across the area for the next 20 years. This joined up approach aligns with national policy and guidance and seeks to ensure that housing needs across the entire county are met over the plan period.
- 4.1.3 Gladman are supportive of the Council using the standard method as the basis for the calculation of housing need as this aligns with the latest national planning policy and guidance. Through the process of producing the Stroud LPR the 638 figure should be considered as the minimum needed and in determining where new housing should go the Council should be open minded to the fact that this figure may increase further through Duty to Cooperate discussions and consideration of economic growth aspirations.
- 4.1.4 Being pro-active about this likelihood will help to avoid any delays through the process of plan preparation. Once the minimum housing need has been established further interrogation of this figure will be required to ensure this is appropriate, for example it may be necessary to increase this figure to support economic growth or to meet affordable housing needs as set out in the PPG.
- 4.1.5 As outlined above, Gladman urge the Council to remember that the standard method for calculating housing need is a minimum and that this should not be seen as a definitive target or cap on sustainable development being brought forwards.
- 4.1.6 In addition to the LHNA figure, Gladman note that the consultation document also identifies a need for 650 bed spaces in C2, but that the provision of extra care may reduce this. Gladman are supportive of the needs of older people being considered and urge the Council to ensure that the Local Plan include a positive policy approach to ensure the delivery of this specific housing need.
- 4.1.7 Gladman submit that it is critical that the LPR provides sufficient contingency and flexibility for occasions when housing allocations do not come forwards as planned. From our experience with regards to other Local Plans, Gladman recommend that the LPR should include a 10-20% flexibility factor. This would help ensure the plan is effective and the necessary scale of housing is delivered over the plan period.

4.2 Housing Distribution

- 4.2.1 The LPR proposes to concentrate housing growth at the main towns of Cam, Dursley, Stonehouse and Stroud due to the accessibility of services, facilities and infrastructure in these locations. Housing and employment growth will also be centred around two new settlements located at Sharpness and Wisloe where there is the intention to create new sustainable settlements based on garden village principles. In addition to this, modest levels of growth will be delivered at the local service centres (Berkley, Minchinhampton, Nailsworth and Painswick) and lesser levels of growth at the villages.
- 4.2.2 Gladman are supportive of a strategy which adopts a hybrid approach to growth, in so much as it directs growth to a range of tiers of settlements and also to the creation of new settlements. Whilst Gladman recognise that the main towns offer the most sustainable locations and consequently it follows that they should be delivering a significant proportion of growth, this does not mean that the plan should place an over reliance on these locations at the expense of other settlements within the district.
- 4.2.3 Gladman are supportive of the LPR including a number of new settlements as part of their overall growth strategy. These types of locations can have an important role to play in the delivery of much needed housing across the plan period. Notwithstanding this, it is of fundamental importance that the plan adopts a realistic approach in terms of the lead in times and delivery rates for these types of developments. With this in mind, Gladman make reference to the recent Inspectors letter in relation to the Uttlesford Local Plan, in summary this recommends withdrawal of the Local Plan on the basis that there is a lack of evidence to robustly justify the deliverability of the three Garden Communities which make up a significant proportion of the growth strategy. It is important that the Council consider in detail the infrastructure requirements, overall viability and delivery timeframes for these new settlements to ensure they are capable of demonstrating their deliverability and soundness for inclusion within the LPR.
- 4.2.4 The LPR outlines the site at Whaddon as an extension to Gloucester but which will be delivering housing numbers with Stroud LPA. The text identifies that further work is being undertaken regarding potential sites to meet Gloucester's longer-term needs but that this site could either be to meet the needs of Gloucester or alternatively may still be included within this plan but to meet Stroud's own development needs. These elements of the plan will need determining as the plan progresses through preparation and will need to be clearly explained in the submission version of the LPR. As mentioned within the DtC section of this submission, it will be critical for the Council to prepare a SoCG with the JCS authorities in relation to Gloucester's unmet need and the site at Whaddon if it progresses within the plan.
- 4.2.5 In relation to the distribution of growth, in allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer

the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary, a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

- 4.2.6 Furthermore, in allocating sites the Stroud LPR needs to ensure that it provides sufficient contingency and flexibility for occasions when allocations do not come forward as planned. From our experience, with regards to other Local Plans, Gladman recommend that the plan should include a 10-20% flexibility factor. This will help ensure the plan is effective and the necessary scale of housing is delivered over the plan period.

4.3 Local Green Space and Community Facilities

- 4.3.1 Section 2.8 of the LPR consultation draft relates to Local Green Space (LGS) and community facilities and refers to the Open Space, Green Infrastructure, Sport and Recreation Study which has been prepared to inform this element of the LPR.

- 4.3.2 Whilst Gladman have no specific comments regarding this section of the plan and do not have any areas of land we wish to identify for consideration as LGS designation, we take this opportunity to remind the Council of the tests which need to met when seeking to designate LGS.

- 4.3.3 Paragraph 100 of the NPPF states *"The Local Green Space designation should only be used where the green space is:*

- a) In reasonably close proximity to the community it serves;*
- b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness of its wildlife; and*
- c) Local in character and is not an extensive tract of land."*

- 4.3.4 The PPG provides further guidance on LGS designations including at paragraph ID.37-015-20140306: *"There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space Designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name."*

4.4 Core Policy CP2 – Strategic Growth and Development Locations

- 4.4.1 Policy CP2 outlines the Strategic Development Locations allocated to deliver 12,800 new homes, 650 additional care home bedspaces, and at least 50 hectares of additional employment land to meet needs between 2020 and 2040. In addition, the policy outlines settlements which will be allocated Local Development Sites and the housing numbers to be delivered within these allocations. In addition to allocations, Policy CP2 outlines that development will take place in accordance with the Settlement Hierarchy (CP3) and for housing development that this will be within development limits.
- 4.4.2 Policy CP2 outlines delivery of land at Whaddon for 2,500 to help meet the unmet needs of Gloucester City, subject to it being required and the JCS Review identifying this location for delivery. Gladman are supportive of the Council working with neighbouring LPAs regarding cross boundary strategic issues such as unmet housing need. This is a proactive approach seeking to ensure the delivery of housing need across the Gloucestershire.
- 4.4.3 Whilst this approach is supported, it is fundamental that delivery at Whaddon is attributed to meeting the needs of Gloucester City and not those of Stroud District if this is the finalised position. This needs to be set out in an unambiguous manner through the LPR to avoid confusion.

4.5 Core Policy CP3 – Settlement Hierarchy

- 4.5.1 All settlements identified in CP3 have defined Settlement Development Limits (SDL) and the policy outlines that within and (exceptionally) adjacent to which suitable development may be permitted. Very small settlements not mentioned within Policy CP3 will be classed as open countryside where development will be restricted except for in accordance with CP15.
- 4.5.2 Gladman would be opposed to the definition of an urban edge if this would preclude appropriately sited and sustainable development coming forward to meet the district's housing needs, in accordance with the Presumption in Favour of Sustainable Development. Proposals that are sustainable should go ahead without delay. An overly restrictive approach could result in a plan that is not positively prepared or effective.
- 4.5.3 Gladman support the inclusion within this policy of the reference to sites lying adjacent to but outside of SDLs. Settlement boundaries such as the SDLs should not be used as rigid cut off points beyond which development is resisted. Gladman would support a more flexible approach to the use of SDLs which recognises that there may be sites outside of these but well related to the built form which could bring forward sustainable development.

4.6 Core Policy CP6 – Infrastructure and Developer Contributions

- 4.6.1 Gladman note that the Council are not proposing any changes to Policy CP6 from the Local Plan. Notwithstanding this, Gladman take the opportunity to remind the Council that any requests for

developer contributions must meet the obligations tests as set out in paragraph 56 of the NPPF (2019). These are:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

4.6.2 In order to avoid any confusion, it is suggested that the Council make clear which stakeholder is responsible for the request and, where possible, the delivery of each contribution tied to a development.

4.6.3 Any request made for contributions should be done as soon as practicable during the planning application process in order to aid efficiency of the determination process and allow for time for negotiation with the statutory timescales if required. It would also be useful if guidance is provided at the pre-application process in order to aid efficiency of the determination process and allow for time for negotiation within the statutory timescale if required.

4.6.4 Any requests for contributions made to a planning application should be supported by clear evidence which illustrates that the request has been made in full accordance with paragraph 56 of the NPPF as set out above.

4.6.5 It is important that flexibility is provided to ensure that sustainable development opportunities are delivered. This may include the phasing of payments / infrastructure in alignment with the delivery of housing on site, in order to minimise upfront costs and associated risk. The adoption of this approach will be beneficial to the delivery rate of a development and will ensure that necessary infrastructure is delivered as it is required.

5 SHAPING THE FUTURE OF STROUD

5.1 Introduction

5.1.1 The Stroud LPR, similarly, to the existing Local Plan splits the district into a number of clusters/area and outlines an approach specific to each of these locations, a number of these are discussed in turn below.

5.2 The Stroud Valleys

5.2.1 Gladman are promoting land at Summer Street, Stroud for residential development. Further details regarding this site are provided later in this submission. Gladman support the identification of Stroud as the District's principal town and the subsequent allocation of growth to this location.

5.3 Cam and Dursley

5.3.1 Gladman support the identification of Cam as a Tier 1 settlement given the scale of the settlement and the facilities and services available. Consequently, Gladman support the LPR proposing to allocate significant growth to this settlement.

5.3.2 Proposed allocation PS25 'east of River Cam' is allocated for 180 dwellings and associated community infrastructure and open space, to complete the existing Local Plan strategic allocation which lies to the north of this site.

5.3.3 Gladman are supportive of proposed allocation PS25 and believe that this provides a logical and sustainable location for housing growth. Gladman are working with the landowner in relation to the promotion of their land for residential development for land which forms part of this proposed allocation and are keen to work with the Council to bring forward a high quality residential scheme in this location. Further details regarding the site which Gladman are promoting are included within later sections of this submission.

5.3.4 The site Gladman are promoting extends beyond the boundaries of PS25. As detailed later within this submission, Gladman recommended that the allocation is extended to include this additional land.

5.4 The Gloucester Fringe

5.4.1 Gladman note that the LPR is proposing an extension to Hunts Grove (PS30) and that this allocation is expected to deliver 750 dwellings, a primary school and associated community and open space uses. Gladman support the LPR allocating this additional land at Hunts Grove as a logical extension to the existing allocation. Notwithstanding this, Gladman urge the Council to ensure that they use realistic lead in times and delivery rates in relation to this large strategic site. It is also fundamental that infrastructure provision and viability is considered in detail. Ensuring that the site allocations are deliverable is fundamental for the effectiveness of the plan as a whole.

- 5.4.2 Gladman note, that in addition to PS30, the Council are proposing a strategic mixed-use development South of Hardwicke (G1). This site is identified to deliver approximately 1,200 dwellings, local centre, community uses, primary school, green infrastructure and open space. Whilst Gladman have no specific comments on the site itself, we would highlight that the site lies adjacent to site PS30 identified to deliver 750 dwellings and therefore the Council should take into consideration the implications of these two neighbouring large sites in terms of any implications on delivery rate assumptions and any potential for market saturation in this location.
- 5.4.3 In addition to Hunts Grove and Hardwick the LPR identifies land at Whaddon (G2) as a proposed strategic mixed-use allocation, which could deliver approximately 2,500 new homes. The supporting text, explains that the Gloucester, Cheltenham and Tewkesbury JCS has identified that in the longer term additional sites will be required to meet Gloucester's housing needs beyond 2028 and that Stroud District Council is committed to working with the JCS authorities to find the most appropriate location to deliver this need. An assessment of alternative sites to meet Gloucester's longer-term needs is currently being undertaken but current indications are that Whaddon may be amongst the better performing options. The text goes on to explain that if the work concludes that the site is not needed to meet Gloucester's needs then there is the potential to review how the land might contribute to Stroud's own needs.
- 5.4.4 Gladman support the Council in the approach to working collaboratively with the JCS authorities. Once the site assessment work is complete it is critical that the plan is clear whether this site is to address the needs of Gloucester or whether the site forms part of the Stroud LPR to meet Stroud's own needs. As outlined previously a SoCG should be prepared in relation to this aspect of the plan.
- 5.4.5 As per the comments above regarding Hardwick and Huntsgrove, it is fundamental that the plan applies realistic lead in times and delivery rate assumptions regarding this potential large strategic allocation.

5.5 The Berkley Cluster

- 5.5.1 Within the Berkley cluster the Council are proposing growth to be focussed at two new settlements at Sharpness and Wisloe. Gladman are supportive of the growth strategy including new settlements in combination with additional growth of varying scales in locations across the district.
- 5.5.2 New settlements, such as these, can play an important role in the delivery of new housing to meet the needs of a district whilst avoiding some of the major constraints that may limit development elsewhere. However, the lead in times and delivery rates of such schemes must be realistic and it is highly unlikely that these will start to deliver units within the first five years of the Plan. Therefore, any new settlements must be complemented by a range of additional smaller scale sites both in urban and rural locations that will deliver units in the early part of the plan period and provide flexibility if the larger sites do not deliver as quickly as anticipated.

5.6 The Wotton Cluster

- 5.6.1 Gladman are promoting a site within Kingswood, which falls within the Wotton Cluster. Further details regarding this site are provided later within this representation.
- 5.6.2 Gladman note that the Settlement Development Limit (SDL) for Kingswood needs to be updated to reflect the true extent of the existing built form and committed development sites.

6 HOMES AND COMMUNITIES

6.1 Core Policy – DCP2 Supporting Older People

- 6.1.1 Gladman support the inclusion of a policy within the LPR relating to supporting older people. With regards to the provision of housing to meet this specific need, Policy DCP2 outlines that *“developments will be supported which: 2) increase the range of available housing options with care and support services in accessible locations...”*
- 6.1.2 Gladman recommend that the Council take a positive, proactive policy approach to ensure the housing needs of older people are met across the District and do not believe that Policy DCP2 is an effective policy which would result in the delivery of this specific element of housing need.
- 6.1.3 The provision of specialist housing to meet the needs of older people is of increasing importance and the Council need to ensure that this is reflected through a positive policy approach within the Local Plan. The Councils need a robust understanding of the scale of this type of need across the District and an effective approach for the delivery of this.
- 6.1.4 Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including residents’ lounge, library, dining room, guest suit, quiet lounge, IT suit, assisted bathroom, internal buggy store and changing facilities, reception and care managers office and staff facilities.
- 6.1.5 Given the existing evidence in relation to ageing populations, and the national strategy in relation to housing for older people, Gladman recommend that the LPR should include a specific policy in relation to the provision of specialist accommodation for older people. The following text provides an example of the type of policy which could be included in the new LPR:

“The provision of purpose built and/or specialist accommodation with care for older people in sustainable locations in the main settlements and local service centres will be supported. Schemes should also be considered in other sustainable settlements where there is a proven need. Apartments should be restricted for occupation by only those with care needs, include minimum compulsory care packages, should also include age restrictions and an extensive range of communal facilities.

Schemes are expected to be promoted in partnership with an onsite 24/7 care provider to safeguard the delivery of care and support to residents.

Such schemes fall wholly within the auspices of C2 use, meet an otherwise unmet need for specialist accommodation for older people, deliver care and communal facilities and will not therefore be required to contribute towards affordable housing.”

6.2 Core Policy – CP8 New Housing Development

- 6.2.1 Policy CP8 outlines an expectation that for major housing sites the mix, tenure and sizes should reflect the housing needs identified for that Parish Cluster area, and makes reference to the LHNA outlining housing needs. Whilst Gladman agree that the needs may vary across the district, so considering this on sub areas within the district is appropriate, it is also important to remember that needs are likely to change over the course of the plan period and therefore these considerations should not solely be made on the basis of the LHNA which outlines needs at a fixed point in time. It will be important to consider the most up to date evidence to ensure that proposals are responding to the housing needs at that point in time.
- 6.2.2 Gladman recommend that the policy is updated to provide this further flexibility. It is critical that the policy does not unnecessarily restrict housing delivery and that schemes can respond appropriately to local needs at that point in time, as well as responding to site and location specifics.

6.3 Core Policy – CP9 Affordable Housing

- 6.3.1 Policy CP9 outlines that in the listed areas sites capable of providing 4 or more dwellings will be required to provide 30% affordable housing .In all other areas, sites capable of providing 10 or more dwellings, or covering a site area of 0.5 hectares or more will be required to provide 30% affordable housing
- 6.3.2 Gladman note that this update to Policy CP9 reflects the changes to affordable housing thresholds as set out in paragraph 63 of the NPPF (2019).
- 6.3.3 The policy goes on to state that the Council will negotiate tenure, size and type of affordable housing on a site by site basis having regard to housing needs, site specifics and other factors. Gladman support the flexibility provided within this policy in terms of the tenure, size and type. This is important to ensure that the affordable housing delivered both aligns with local needs and is appropriate for the site.

6.4 Delivery Policy – DHCP1 Meeting Housing Need Within Defined Settlements

- 6.4.1 Policy DHCP1 sets out the Councils approach to settlement boundaries and outlines that *“at all settlements with defined settlement development limits, permission will be granted for residential development or redevelopment within those defined settlement development limits, subject to the satisfaction of detailed criteria defined for meeting housing need at settlements.”*

6.4.2 Gladman object to this approach as there may be sites adjacent to but outside of the defined settlement limits which are sustainable, would not result in material harm and would assist the Council in meeting their housing need.

6.4.3 The policy should be amended to be flexible enough to accommodate new development outside of existing settlement development limits, to allow the Council to quickly address any issues in shortfall in housing supply against the plan requirement. Gladman recommend that the Council could incorporate a criteria based policy to achieve this, such an approach would allow the plan to protect itself against unsustainable development at the same times as being open and flexible to additional development opportunities to come forwards to meet identified needs. Gladman refer to policy GD2 of the Harborough Local Plan as an example, which states:

“in addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of Market Harborough, Key Centres, the Leicestershire Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where...”

A series of criteria then follows.

6.4.4 Gladman recommend that the Council consider updating Policy DHCP1 to reflect these comments.

6.5 Delivery Policy – DHC2 Sustainable Rural Communities

6.5.1 Policy DHC2 is a new policy proposed through the LPR which it states is seeking to provide greater flexibility for the rural communities in order to counter demographic trends in the rural settlements.

6.5.2 The proposed policy outlines that housing schemes of up to 9 dwellings will be supported outside SDLs at designated Tier 4 settlements providing certain criteria are met. The policy goes on to set out that for schemes of 4 or more dwellings, where 30% affordable housing is required, the affordable housing will be made available for those in need with a strong local connection.

6.5.3 Gladman are supportive of the flexibility provided through this policy to enable some development to come forward outside SDLs of Tier 4 settlements, however believe that this should not be restricted to schemes of up to 9 dwellings, rather it should allow for schemes of an appropriate size (in relation to the settlement) to come forward.

6.6 Delivery Policy – HC3 Self build and Custom build Housing Provision

6.6.1 Policy HC3 relates to the provision of self-build and custom-build housing. This outlines that the Council will be supportive of the provision of self-build and custom-build dwellings within SDL and also single plot affordable self-build adjacent to SDL. On strategic sites allocated in the Local Plan the Council will require a minimum of 2% of dwellings to be provided as plots for self-build and custom-build in order to meet the Government aspirations in relation to this type of development.

6.6.2 Whilst Gladman are supportive of the Local Plan including a policy regarding the provision of self-build, when setting a specific requirement for strategic sites to meet, there does still need to be evidence of local demand for this type of housing, therefore it is important that the policy retains its reference to the need for appropriate demand being identified.

6.6.3 In addition Gladman recommend that the policy includes a mechanism whereby if the self-build and custom-build plots are not brought forward within a given timeframe that the plots revert back to market housing as part of the wider scheme so that it does not unnecessarily restrict the delivery of much needed housing.

6.7 Delivery Policy – HC1 Detailed Criteria for New Housing Development

6.7.1 Policy HC1 provides a long list of criteria which new housing development, within SDLs and other housing development specifically allowed for by other policies in the plan at locations outside of SDLs must meet in order to be permitted. Gladman note that the amendment to this policy from the existing Local Plan is to ensure that housing on the edge of settlements also meet the detailed criteria.

6.7.2 Part 1 of the policy relates to scale, density and layout and outlines the need for schemes to be compatible with the character, appearance and amenity of that part of the settlement. Gladman support the need for these considerations to be made in relation to the specific locality and note that site specifics may also have an influence on this.

6.7.3 Part 2 of the policy highlights that where appropriate schemes should include a variety of dwelling types and sizes which meet identified need. Gladman support the use of the term “where appropriate” within this policy as it allows an element of flexibility and for proposals to be considered on a site by site basis.

6.7.4 Part 3 of this policy relates specifically to edge of settlement sites and seeks to ensure a sense of transition between the open countryside and the existing settlement core. Gladman are supportive of this element of the policy, but remind the Council of the need to consider sites on their own merit and thoroughly weigh up the benefits and harms that a proposal would result in.

6.7.5 Gladman note that part 8 of the policy refers to the need for sites not to be subject to any other over-riding environmental or other material planning constraint. Gladman do not consider this clause to be necessary within this policy as it is covered by national planning policy.

6.8 Delivery Policy – DHC4 Community Led Housing

6.8.1 Gladman note that Policy DHC4 is a new policy that does not feature in the existing Local Plan. Gladman object to the introduction of this policy and recommend it should be removed from the LPR in its entirety.

- 6.8.2 The proposed policy states *“The Council supports the development of housing schemes that are initiated by local communities... While there are a number of types of community group or organisation that may be appropriate to promote development proposals, the Council will expect that the proposal has been initiated by a legitimate local community group ...”*
- 6.8.3 Gladman are unclear why a proposal for a scheme on the same piece of land but being promoted by a developer rather than a community should be afforded this support by the Council. If it is a sustainable site, appropriate for development then, then it is so irrelevant of who is bringing the site forwards. Gladman strongly recommend the removal of this policy.

7 OUR ENVIRONMENT AND SURROUNDINGS

7.1 Core Policy – CP14 High Quality Sustainable Development

7.1.1 Gladman note that Policy CP14 is proposed to be updated through the LPR to reflect changes in national policy with regards to biodiversity net gain. Specifically, part 9 of the policy refers to biodiversity net gain. Whilst Gladman accept this reference it is important that the long term impacts are considered when reviewing proposals for biodiversity net gain taking into account that many of the measures provided as part of the development will need to mature beyond the build period.

7.1.2 Gladman also take the opportunity to note that if off-site mitigation provides the best opportunity for biodiversity gain, then the policy should be flexible enough to allow for this and it should not be ruled out from the planning application process.

7.2 Core Policy – CP15 A Quality Living and Working Countryside

7.2.1 Policy CP15 provides a series of exceptions for where development will be considered outside of SDLs in the open countryside. These include amongst others, rural exceptions sites, replacement dwellings and schemes of up to 9 dwellings at tier 4a or 4b settlements with support from the local community.

7.2.2 Gladman consider the approach to development in the open countryside to be too restrictive. In this regard Gladman refer to comments made in response to Policy DHCP1 and suggest that again a criteria based policy providing additional flexibility would be appropriate here.

7.3 Delivery Policy – ES1 Sustainable Construction and Design

7.3.1 Policy ES1 outlines a series of requirements in relation to sustainable design and construction, specifically setting out a range of minimum reductions in emissions over Part L 2013 Building Regulations. Whilst Gladman recognise the importance of reducing carbon emissions in development, Gladman would urge the Council away from rigid requirements in relation to this and would instead suggest that this could be included as something the Council would encourage see favourable as part of proposals.

7.3.2 Going above and beyond Building Regulations is likely to have an impact on schemes viability, therefore, to enforce this through a policy requirement could have a negative impact on the delivery of housing.

7.3.3 It is important that the Council carefully consider the financial implications of all policy requirements and that these are tested through a robust up to date full plan Viability Assessment. It is important that the cumulative impacts of policy requirements do not render schemes undeliverable.

7.4 Delivery Policy - ES6 Providing for Biodiversity and Geodiversity

- 7.4.1 Gladman note that the LPR seeks to strengthen the existing policy and ensure that it reflects the revised NPPF. With regards to providing net gains in biodiversity Gladman reiterate comments made in response to Policy CP14.

7.5 Delivery Policy- ES10 Valuing our Historic Environment and Assets

- 7.5.1 Policy ES10 relates to the historic environment and outlines how the historic environment will be preserved, protected of enhanced.
- 7.5.2 Gladman make refence to the NPPF (2019), specifically paragraphs 195-197, which outlines the policy tests which should be applied where development effects designated and non-designated heritage assets. The Council need to ensure that Policy ES10 reflects the national policy and aligns with these varying tests.
- 7.5.3 Specifically the NPPF states that developments leading to substantial harm of a designated heritage asset should be refused unless it is necessary to achieve substantial public benefits that outweigh the harm, where proposals would lead to less than substantial harm then this harm should be weighed against the public benefits. With regards to proposals impacting on non-designated heritage assets a balanced judgment will be required.

8 SITE SUBMISSION

8.1 Introduction

8.1.1 Gladman are promoting a number of sites within Stroud District. Further details on each of these sites is included in turn below.

8.2 Land north of Upthorpe, Cam

8.2.1 Gladman are promoting land north of Upthorpe, Cam for residential development and associated community infrastructure. A location plan for this site is included below as Figure 1. This site forms part of the proposed allocation PS25 'East of River Cam'. Consequently, Gladman are supportive of proposed allocation PS25, however would recommend that this allocation is extended to include all of the land shown in Figure 1. Extending the proposed allocation would make the most efficient use of land, provide a suitable access to the site and help to deliver much needed housing in Stroud. This extension to the proposed allocation is logical and would add the ability to deliver a greater number of homes in this highly sustainable and suitable location.

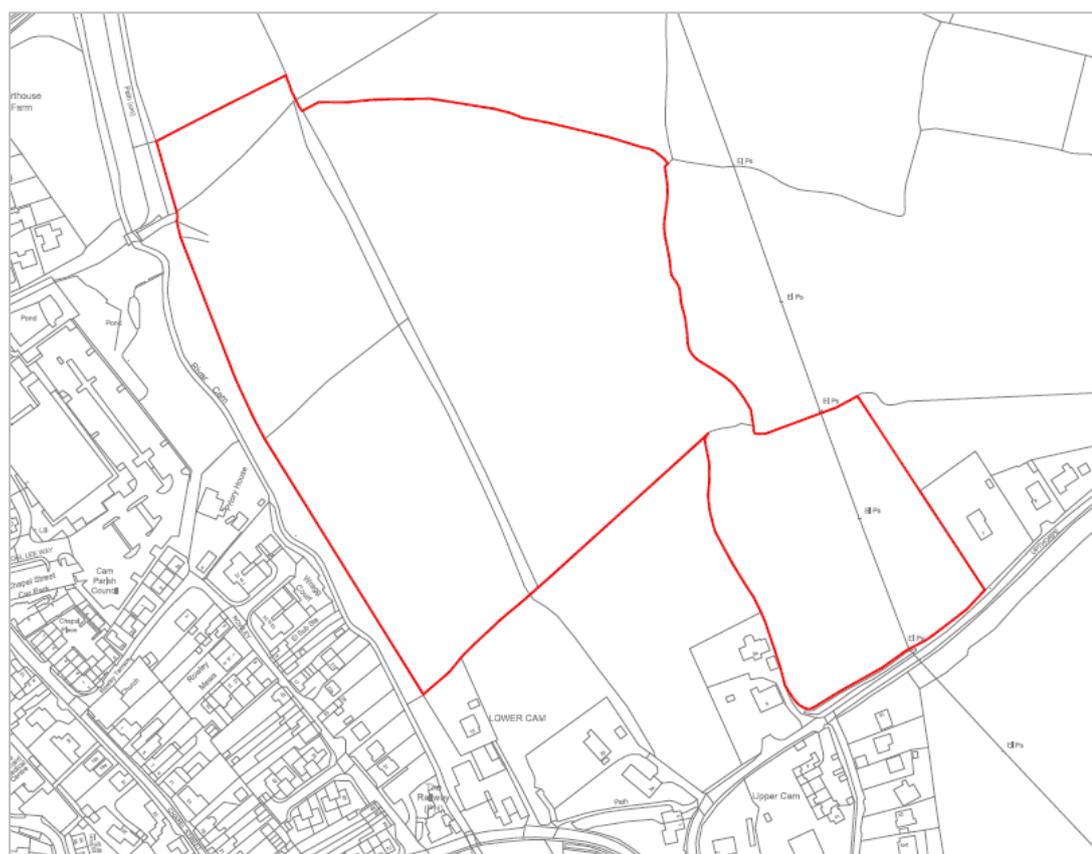


Figure 1. Location Plan, land north of Upthorpe, Cam

8.2.2 Taking account of already committed development in Cam, this extended version of PS25 provides a logical extension to the settlement, offers the opportunity to deliver a greater number of dwellings along with a wider range of benefits for both existing and new residents.

- 8.2.3 Gladman would welcome the opportunity to discuss our proposals for this site with the Council in more detail and recommend that the proposed allocation should be amended to include the additional land within the red line.

8.3 Charfield Road, Kingswood

- 8.3.1 As the Council are aware Gladman are promoting land at Charfield Road, Kingswood for residential development and associated community infrastructure. The location plan for this site is shown in Figure 2 below.

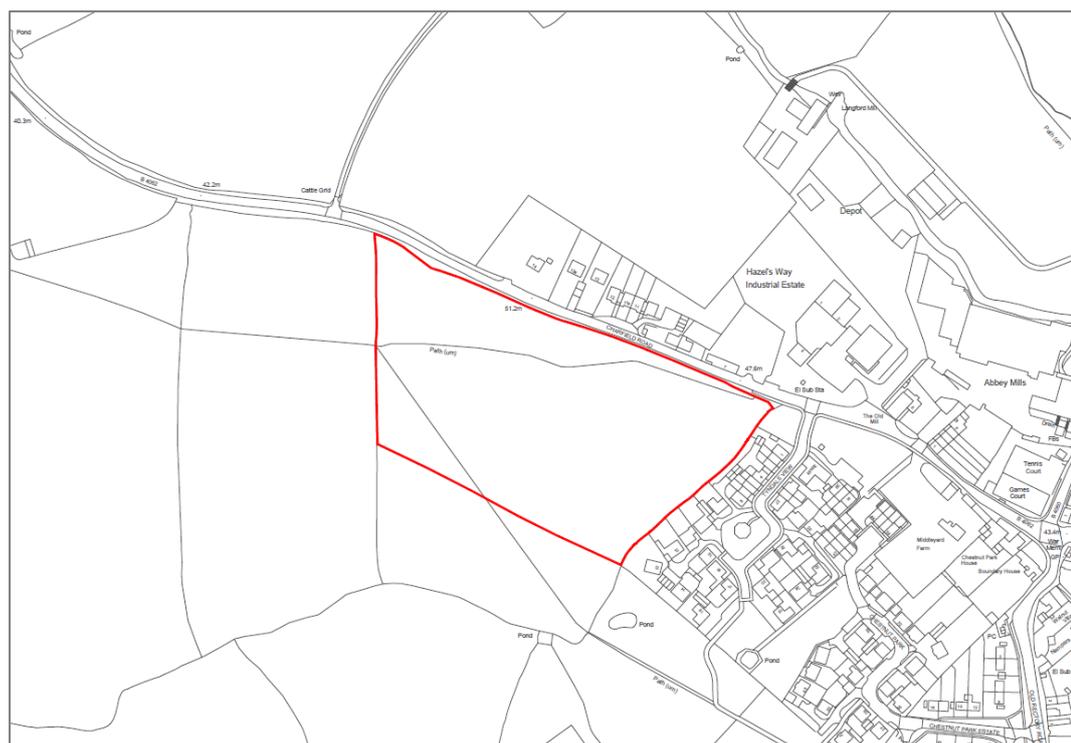


Figure 2. Location Plan, Charfield Road, Kingswood

- 8.3.2 Gladman believes that this site offers a real opportunity to the residents of the local community and the wider area to assist in meeting identified housing needs and deliver significant improvements to the public realm, including the provision of public open space.
- 8.3.3 The site is free from significant constraints, and is not subject to, nor especially sensitive in terms of built or natural protection designations. The proposed housing development will not result in significant harm in terms of acknowledged amenity, community, heritage, landscape, traffic, environmental, technical or other acknowledged public interest.
- 8.3.4 The site extends approximately 3.32 hectares and can be accessed directly off Charfield Road, which forms the site's northern boundary. The site is contained to the east by existing residential development. The western and southern field boundaries are bordered by interspersed hedgerows.

8.3.5 Taking account of the recent patterns of growth to this settlement, this site forms a logical extension to Kingswood. The site would provide a wider range of community benefits for both existing and new residents.

8.3.6 Gladman submits that the site is available and suitable for residential development and request that the Council consider allocating the site for residential development through the LPR to assist Stroud in meeting its local housing need. Gladman would welcome the opportunity to discuss our proposals for this site with the Council in more detail.

8.4 Summer Street, Stroud

8.4.1 Again, as the Council are aware the Gladman are promoting land at Summer Street, Stroud for residential development and associated community infrastructure. The location plan for this site is shown in Figure 3 below.

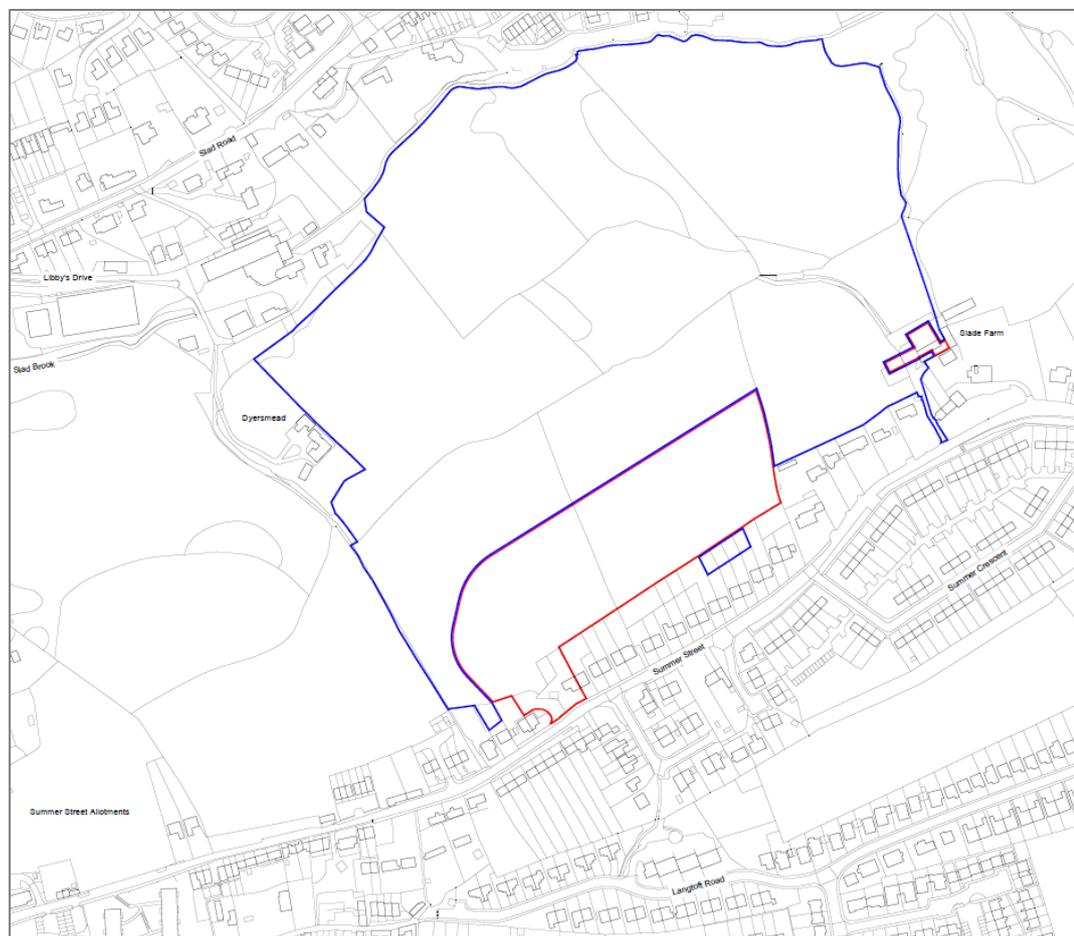


Figure 3.Location Plan, Summer Street, Stroud

8.4.2 Gladman submits that this site represents a sustainable location for development and could assist the Council in meeting its local housing needs.

- 8.4.3 Gladman submit that the site is suitable and available for residential development and request that the Council consider allocating the site for residential development. Gladman would welcome the opportunity to discuss our proposals with the Council in more detail.

9 CONCLUSION

9.1 Overall Conclusion

9.1.1 Gladman welcome the opportunity to comment on the Stroud LPR consultation draft and hope that these representations are found to be constructive. Gladman request to be added to the consultation database and updated on any future public consultations for the Stroud LPR.

9.1.2 For the LPR to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. These tests are outlined as follows:

- **Positively prepared** – provide a strategy which, as a minimum seeks to meet the areas objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking account the reasonable alternatives based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

9.1.3 Gladman have provided comments on a number of the proposed policies within the LPR and believe that these need considering and addressing in order for the plan to be found sound at examination.

9.2 Site Submissions

9.2.1 Gladman have a number of land interests within Stroud District and are promoting these for residential development. The sites are as follows:

- Land north of Upthorpe, Cam
- Charfield Road, Kingswood
- Summer Street, Stroud

9.2.2 These sites are all sustainable development locations, are available and deliverable. Gladman are keen to work with the Council and the landowners to bring forwards high quality residential schemes in these locations and would welcome the opportunity to discuss these sites further with Council officers.