

[REDACTED]

From: [REDACTED]
Sent:
To: _WEB_Local Plan
Cc: _CLLR_Davies, Stephen; _CLLR_Jones, John
Subject: Local Plan Review Consultation response from Keep Eastington Rural

Follow Up Flag: Follow up
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Dear Sirs

Keep Eastington Rural (KER) has little objection to the policies now drafted, indeed many are attractive and supportive of life in Stroud District, including Eastington.

Our one objection is to the proposals at site PS 20, which we see as denigrating key objectives of the proposed Plan. It is an anachronism, weakening the power of Strategic Objectives and Core Policies in such a way as to give future challengers to the Plan scope to exploit the inconsistencies.

This is not an issue that only affects Eastington - it affects every parish and town with aspirations for employment premises. It falls to KER to point this out with the intention of strengthening the Plan for everyone's benefit.

Yours sincerely

[REDACTED]

For Keep Eastington Rural

ISSUES with the EMPLOYMENT POLICIES in DRAFT LOCAL PLAN

@ DECEMBER 2019

1. Purpose of this note

Eastington is being threatened with a Strategic Employment Allocation of 10 hectares at Junction 13, south of A419, labelled PS20.

This note outline areas of weakness in the proposed allocation, which we recognise as points which future challengers to this Plan can exploit, particularly at Appeals:

- Contradiction of 40 Key Issues: 1,18, 20, 26, 36, 37
- Contradiction Vision to 2040, paras 2 and 3
- Contradiction of Strategic Objectives, SO2, SO4, SO5
- Detraction from the Development Strategy Headlines, 2.12 and for Brownfield Sites, 2.20, 2.21, 2.22, 2.23, 2.24, 2.25

- Contradiction of Employment Distribution, 2.58, 2.59, Draft Strategy paras 1 & 5
- Contradiction of Core Policy CP11, first para
- Contravention of Core Policy CP13, para 3, 3(i), 3(iv)
- Contravention of Core Policy CP4, specifically para 1.

These can be grouped into three broad categories:

- Excessive travel-to-work by private car, threatening carbon-neutral 2030
- Isolation of site PS20 from any community
- Honey-pot site depriving growth from re-generation sites and integrated sites

2. Excessive travel-to-work by private car, threatening carbon-neutral 2030

The very first “Key Issue” discussed is Stroud DC’s bold and laudable objective of reaching carbon neutrality by 2030, ahead of all central government targets.

“This cross-cutting issue is touched upon by many of the Draft Plan’s key issues and the emerging Strategic Objectives”

PS 20 is proposed within metres of Motorway Junction 13, a clear invitation to inward commuting by means of the private car. Nothing could be more counter to the 2030 Objective, which is repeated in Key Issues 18 and 20 “....an emphasis on limiting car use....”.

In the high-profile “Vision to 2040” the 2030 carbon neutral objective is front and centre:

“....adapt our lifestyles to live within our environmental limits,
including travelling in sustainable ways”

Equally high level is Strategic Objective SO4, whose very opening line states:

“Promoting healthier alternatives to the use of the private car”

Site PS20 fails completely to achieve this. Whilst all other proposed strategic employment sites are adjacent to a community, who can choose to walk or cycle to their factory or office, PS20 opens its doors directly to the motorway and the private cars of people who may not even live within our District.

3. Isolation of site PS20 from any community

Embedded in the 2015 – 2031 Local Plan is the principle of integrating living and working spaces to achieve balanced communities. West of Stonehouse and west of Cam were specifically designed as such.

The previous plan indeed gave us the Hunts Grove community (now its own Parish) and Littlecombe in the Dursley/Cam conurbation.

All four have a balance of housing, shopping, schools and employment sites, with the opportunity to walk or cycle to work or use local buses.

Now, the proposal for 2022 – 2040 is not only to extend these four but to add two further strategic sites at Newtown/Sharpness and Wisloe. Draft Strategy at para 2.24 and 2.25 offers:

“Newtown/Sharpness.....a new garden village community incorporating housing, employment , shopping, a new secondary school.....”

“At Wisloe.....garden village community incorporating housing , employment, shopping.....with the opportunity to improve access to Cam and Dursley rail station....”

This Draft Plan chrysalises this theme in the Draft Strategy’s second paragraph, 2.12:

“The strategy supports the development of inclusive, diverse communities with Housing and employment in close proximity and good access to wider services and facilities, to reduce our carbon footprint and to improve the District’s sustainability and self-containment”.

That is a powerful statement to which most people would subscribe, indeed it is the very epitome of what Strategic Planning should be doing.

Site PS20 has no proposed community, it is a throw-back to piecemeal planning and the 1960’s theories of motorway junction clusters and an age when petrol was cheap and plentiful.

It would be false to claim that PS20 is a mile away from West of Stonehouse, because that community was designed more than 5 years ago as a balanced, strategic, substantial development with walk/cycling routes to existing and planned employment sites.

PS 20 is not necessary to the viability of West of Stonehouse: indeed, its very presence is a threat to the evolution of the businesses already planned.

4. Honeypot site depriving growth from re-generation sites and integrated sites

Strategic Objective SO 5 states that the Plan should be:

“Promoting the use of appropriately located brownfield land”

PS 20 will completely undermine this important and popular aim. Developers will be attracted to this flat land, directly on the M5 Junction 13 like bees to a honeypot – hence the name.

The Honeypot will drain away interest in all established strategic sites:

- Sites planned in the 2015-2031 Local Plan, for which a range of developers have been refining detailed plans – they will be left with fewer immediate clients and would be entitled to be aggrieved
- New Garden Village sites at Wisloe and Sharpness will be held up, affecting the delivery of housing numbers in these integrated, properly planned developments
- Owners of the old mill sites in the valleys will suddenly find the cost of cleaning up these brownfield sites becomes less economic and change their proposals to deliver more housing and less (if any) commercial units.

One upshot of extra housing with less employment units will be that such homeowners would have to travel out to PS 20, making it less likely that the major policy of “Carbon Neutral by 2030” is achieved.

Finally, there is no analysis of the quantity of vacant units already standing in the strategic sites e.g. Littlecombe, Hunts Grove, Oldends Lane and the ex-mill sites. In all of these locations, Stroud DC owns many units, from which rents are meant to sustain income well into the future.

PS 20 will be more attractive than these sites and so Stroud DC will suffer increasing vacancies and loss of income.

Promoting PS 20 would therefore be Stroud DC shooting itself in the foot financially.

**Keep Eastington Rural
January 2020**