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Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud GL5 4UB

22 January 2020

Dear Sir / Madam,

Stroud District Local Plan Review – Draft Plan Consultation

Thank you for the opportunity to comment on Draft Stroud District Local Plan. It should be noted that the comments below are officer comments, albeit the Executive Committees at both Malvern Hills and Wychavon District Councils are supportive of them.

As background, the South Worcestershire Development Plan (SWDP), covering the administrative areas of Malvern Hills District Council, Worcester City Council and Wychavon District Council, was adopted in February 2016. The South Worcestershire Councils are currently reviewing the SWDP and have recently undertaken consultation on the SWDP Review (SWDPR) Preferred Options. The SWDPR does not require any of its housing, or other development needs, to be met in Stroud.

The South Worcestershire Councils note that:

- The draft Stroud District Local Plan indicates a need to identify land for at least 12,800 new homes in the period to 2040, with the residual housing requirement (after allowing for dwellings with planning permission and other commitments) being 8,000 dwellings.
- To meet the residual housing requirement the Draft Plan identifies land for 8,700 dwellings on a number of strategic and local development sites, including strategic sites on the edge of Gloucester – South of Hardwicke (1,200 dwellings) and Hunts Grove Extension (750 dwellings).
- The Joint Core Strategy for the Gloucester City, Tewkesbury Borough and Cheltenham Borough areas has identified that in the longer term additional sites will be required to meet Gloucester's housing needs beyond 2028.

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- Paragraph 2.31 says that an assessment of sites has already identified that sites within Stroud District at the Gloucester fringe are functionally related to Gloucester and offer the potential to meet Gloucester's needs in accessible locations.

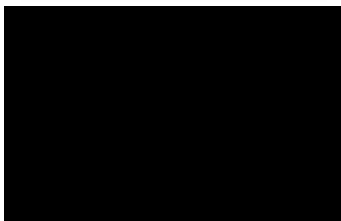
Paragraph 35 of the Framework says that Local Plans should be positively prepared and informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. The Framework also says that Local Plans should be based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred. In light of the above, we consider that it is unclear why the proposed strategic sites on the edge of Gloucester are not being proposed to contribute towards Gloucester City's unmet needs.

Whilst we note that Draft Core Policy CP2 says that Stroud District will make a contribution to meeting the unmet housing needs of Gloucester City at Whaddon (2,500 dwellings), "subject to it being required to meet needs and provided locating growth at this location is consistent with the approved strategy for the Joint Core Strategy Review", we consider that this does not provide the level of certainty that a site allocation in the Draft Plan would provide.

The significance of the above issue to the South Worcestershire Councils is that if the Stroud District Local Plan does not contribute towards meeting some of Gloucester City's unmet need then all of the City's unmet need will have to be met by other neighbouring authorities, which in turn, has implications for their ability to meet their own housing needs. As background to this, Wychavon District and Tewkesbury Borough Councils have been working together to meet some of Tewkesbury's housing needs within Wychavon District at Mitton.

I hope you will find these comments helpful. Please do not hesitate to contact me if you would like to discuss them in more detail. We look forward to continuing constructive dialogue as our Local Plans progress, including discussions relating to Duty to Cooperate Statements of Common Ground.

Yours sincerely



On behalf of the South Worcestershire Councils

Malvern Hills, Worcester City and Wychavon District Councils