

Our Ref: 12461  
20 January 2020

Stroud District Council  
Ebley Mill  
Westward Road  
Stroud  
Gloucestershire  
GL5 4UB

Dear Sir or Madam,

**Re: Stroud District Local Plan Review - Call for Sites – Land at Paynes Meadow, Whitminster**

I write in relation to the review of the Stroud District Local Plan providing representations for the allocation of Land at Paynes Meadow, Whitminster within the draft local plan. These representations follow emails sent on 20 November 2017 and 4 October 2019. These emails included the submission of site location plans and call for sites form related to the site.

As context to the representations, the site comprises a 1.73 hectare developable area which was previously utilised as a paddock. As indicated in the submitted call for sites form and the prior emails, it is proposed that the site is utilised for 75 dwellings, providing a mix of market housing, affordable rented housing and shared ownership housing. The site is proposed to be used for residential development only, no non-residential development will be located at the site.

The site is a green field site with no contamination or pollution envisaged. In terms of stability, the land is undeveloped and is thus stable, whilst the site is also of a level topography. Access to the mains sewage system is available, along with electricity, gas and telecommunications services. There is an adopted highway to the site boundary, with site access having been subject to detailed review by highway consultants. Following investigation, it has also been determined that no wildlife or heritage assets will be impacted by development.

There is no known constraint to development, with all matters fully investigated and any issues resolved in 2015/2016, prior to the adoption of the current local plan.

As indicated on Stroud District Council's website, the purpose of the Draft Plan consultation is to understand the following three elements:

- *Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?*
- *Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?*
- *Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?*

I will now run through each of these questions in turn.

With regard to the first question, we do not support the Council's preferred strategy as the above site is not included in the site allocations. As it is noted that 12,800 additional dwellings will be accommodated by Stroud District Council. Whilst other sites are being allocated elsewhere within the Local Plan, allocating as many sites as possible for housing within the Local Plan will provide a greater ability for the housing targets to be met by providing more opportunities for housing development.

Additionally, we do not support the idea that development on the edge of settlements, as indicated in Core Policy CP3 should be exceptional, especially in this instance. Due to the site being on the boundary with the indicated Settlement Development Limit of Whitminster, with housing to the eastern and southern boundaries of the site, the site is in an ideal location to fulfil the housing needs of Whitminster.

We also do not support the Council's preferred strategy for growth in relation to the changes to the Settlement Development Limit for Whitminster. As indicated in Appendix A, potential changes will be made to the Settlement Development Limit. One of these is SDL-WHI03 which incorporates a small area of the site we have proposed. There is no indication in the Draft Local Plan as to why this small area has been proposed to be included in the Settlement Development Limit and not the wider site area submitted. As part of the site, albeit a small part, is to be included in the Settlement Development Limit, our argument is that the full site should be included, thus providing further justification for the allocation of the site for housing.

For the second question, by virtue of submitting this site for consideration, this will reflect the needs and opportunities present within Whitminster. By providing an allocation for 75 additional dwellings, the housing needs of Whitminster and, by extension, the wider Stroud area, will be accommodated. Additionally, this will be the only site within Whitminster which will be allocated specifically for housing. The other sites allocated in the Draft Local Plan (sites PS45 and PS46) are noted to be allocations for associated community and open space uses. By providing allocation for housing only, this site allocation will serve the housing needs of Whitminster in a more effective manner than the sites allocated in the Draft Local Plan.

With regard to the third question, further changes to the proposed policies are necessary to accommodate the site. In particular, Core Policy CP2 requires further changes. As indicated on page 32 of the Draft Local Plan, the total allocated housing supply is 10,075 whilst Core Policy CP2 states that 12,800 homes are required. By changing the allocations in the policy to allow for 75 additional dwellings to be located at Whitminster, the policy will ensure that more progress is made towards meeting the goal of 12,800 homes.

It is hoped that this land is included in considerations as part of the plan making process. If you need any further information from me then please do not hesitate to ask.

Yours sincerely

**For and on behalf of Evans Jones Ltd**

