

Kingswood Parish Council:

Representations to Stroud District Council

Draft Local Plan Review 2020-2040

Introduction

Background of Kingswood

- I. Kingswood is a historic and characterful village which holds great importance to the local community. Many of its historical features have been preserved including the more recent additions such as old mill buildings which hint at its wool milling history. Today these buildings have been retained and provide important employment facilities and continue to bolster the local economy of the Parish and wider area.
- II. As at the 2011 census, the Parish's population was 1,389, encompassing a dynamic community which has retained its strong village identity. As well as its residents, Kingswood hosts 1,200 employees based at two employment sites within the Parish with large in and outward migration patterns on a daily basis.
- III. In terms of amenity, Kingswood offers one village shop with a post office counter, a primary school, pre-school provision, a church, a village hall, pub, various aged care/health facilities, sporting facilities and an equipped playground.
- IV. Kingswood has inevitably evolved as changing circumstances and new developments have affected the parish over the centuries, however the main built form and character of the settlement has remained well defined over time.
- V. The fast rate of growth seen in Kingswood up to 2014 can be attributed to its location and nearby access to junction 14 of the M5 Motorway. Kingswood along with the neighbouring South Gloucestershire parish of Charfield has been subject to significant and ongoing development interest in recent years.
- VI. As a result of this development the local community sought to capitalise on their rights afforded under the Localism Act 2011 and create a Neighbourhood Development Plan (adopted in 2017) to help guide development into the future.
- VII. For the most part, new development has been integrated into the main settlement. This process has included the creation of new environmental facilities such as a community orchard, allotments and the introduction of measures to mitigate impacts on existing habitats and changes to the natural environment. However, the community is mindful that recent growth has increased pressure on some existing facilities such as the local school, playing field, village hall and local highway network.
- VIII. Further to this, research has been undertaken into the type, tenure and price of recent housing developments between 2008-2015, finding that the majority achieve average sales values significantly above existing stock¹.

¹ Figures set out on p15 of Kingswood Neighbourhood Development Plan. Source: Land registry

Introduction to Representations

- IX. The Parish Council is concerned with SDC's spatial strategy and the proposed site allocation at Kingswood given that it represents an unsustainable pattern of development for Kingswood, its existing facilities and accessibility to services.
- X. Kingswood Parish Council submits the following representations to Stroud District Council's consultation on its Draft Local Plan 2040. Relevant policies to which each topic our representations relate are included in the box below each heading.
- XI. For clarity, these representations cover the following issues:
1. Settlement Roles and Hierarchy and Development Locations
 2. Site Allocations and Methodology
 3. Environmental and Landscape Constraints
 4. Sustainable Development (including transport and infrastructure provision)
 5. Education Infrastructure
 6. Community Survey and lack of appetite for growth.

The key issues raised in these representations can be summarised as follows:

- XII. Kingswood Primary School is currently at capacity. The District's population is increasing and there is still more development being completed in the village without the decision to allocate site PS38 for 50 additional houses. Development is also occurring in Wotton-under-Edge with 75 new homes potentially in the pipeline that will inevitably direct more pressure on the Kingswood Primary School service.
- XIII. The community does not accept that it is sustainable to commute to Wotton-under-Edge for overflow school places as this would further impact existing issues pertaining to traffic congestion, car dependence and therefore sustainable lifestyles, school capacity and air quality.
- XIV. Allocating an additional 50 houses at site PS38 on Wickwar Road will not only exacerbate these issues but generate an additional **51 school places** ranging from pre-school to 18 years of age.
- XV. The Village has already been the target for significant development over the years (16% increase in dwellings in 7 years) and needs time to adjust to this growth and for its infrastructure to be tested at this capacity before more pressure is exerted.
- XVI. Policy CP3 rates Kingswood village as a Tier 3a settlement only by virtue of its proximity to a Tier 2 settlement. This is a poor justification and promotes unsustainable transport between the two settlements particularly given the reality of the lack of sustainable links between Kingswood and Wotton-under-Edge.
- XVII. Policy CP3 offers a loose definition for how Settlement Development Limits should be observed which causes concern for development outside the Kingswood SDL in the future.
- XVIII. The Parish Council has taken a proactive approach to understanding the preferences of their community for future growth and development by undertaking an independent survey. This is summarised in Section 6 of this report.

1. Settlement Hierarchy, Boundaries and Development Locations

Policies to which this section relates to:	NPPF paragraphs	<ul style="list-style-type: none">) 85- Ensuring the vitality of town centres) 7-14- Achieving sustainable development) 102-111- Promoting sustainable transport
	Draft Local Plan	<ul style="list-style-type: none">) Core Policy CP3- Settlement Hierarchy) Core Policy DCP1- Delivering Carbon Neutral by 2030
	Kingswood Neighbourhood Plan	<ul style="list-style-type: none">) Policy SL1: Kingswood settlement development limits boundary

- 1.1. The 2018 update of Stroud District Settlement Role and Function Study forms part of the evidence base for the 2019 draft Local Plan. We understand that this update informs Core Policy CP3 of the 2019 draft Local Plan, stipulating five distinct settlement tiers.
- 1.2. The study amends the hierarchy tiering by adding a new Tier 3a and Tier 3b, the difference being that Tier 3a is in close proximity to accessible places that provide a ‘good range of local services’ whereas 3b provides a similar level of amenity as a 3a settlement, but does not benefit from the proximity to a local centre. Kingswood has been classed as 3a due to its proximity (1.5 miles) to Wotton-under-Edge as a Tier 2 Settlement.
- 1.3. See the justifications for classification of Wotton-under -Edge and Kingswood in the draft Local Plan below:
-) **Wotton-under-Edge is classified as** a Tier 2 Local Service Centre. This includes market towns and large villages that have the ability to support sustainable patterns of living in the District due to facilities, services and employment opportunities they each offer. They should have potential to provide modest levels of jobs and homes including through site allocations in the Plan, promoting better levels of self-containment and viable, sustainable communities.
 -) **Kingswood** is classified as a Tier 3a Accessible Settlements with local facilities. These settlements are generally well-connected and accessible places which provide a good range of local services and facilities for their communities. Some of these settlements outside the AONB may have scope to help to meet the housing needs of more constrained Tier 1 or Tier 2 settlements but that their scope for future growth is constrained beyond the site’s allocation in the draft Plan.
- 1.4. Paragraph 1.9 of the Settlement Role and Function Study establishes that new development should be located in accordance with this hierarchy and aims to promote sustainable communities by bringing housing, jobs and services together and reduce the need to travel.
- 1.5. The 1.5mile distance between Kingswood and Wotton-under-Edge (at the closest points, not centres) has a steep incline, is unsafe and unmanageable for less abled-bodied people to walk, with public transport being infrequent and therefore unappealing to most.
- 1.6. The Settlement Role and Function Update 2018 acknowledges that Kingswood has seen a large proportion of growth over recent years, primarily due to its ‘relative lack of constraints’. This report indicates growth of an additional 33 dwellings between 2011-2018 which is equal to 6% growth.

1.7. A more accurate reflection of growth, however, would be to include the 54 committed dwellings (as at 2018) which translates to 16% increase in dwellings over 7 years. The table below breaks down the growth patterns both in Kingswood and in Wotton-under-Edge for comparison:

Table 1: Summary of growth Wotton-under-Edge & Kingswood

	Wotton-under-Edge	Kingswood
2011 Total existing dwellings	2,192	542
Dwellings delivered 2011-2018	108	33
% increase 2011-2018	4.9%	6.1%
Total dwellings at 2018	2,300	575
Committed new dwellings (2018) ²	45	54
Total dwellings (2018) + commitments	2,345	629
Increase 2011-2018 (including commitments)	153 (6.98%)	87 (16.05%)
Additional dwellings proposed in Draft Local Plan	0	50
Total increase in dwellings 2011-2040	153 + 0= 153	87 + 50= 137
Total % increase 2011-2040	6.98%	25%

1.8. Taking into account the district-wide dwelling growth rate of 6% between 2011-2018³, a 16% dwelling increase clearly far exceeds this. Adding to this the 50 dwellings in PS38 would result in a 25% dwelling increase over a 29-year period.

1.9. If this level of growth is to be proposed, then the associated infrastructure requirements to support sustainable lifestyles for a new larger population must also be accounted for.

1.10. Another key issue with Policy CP3 is the loosening definition of ‘Settlement Development Limits’ (SDL). The Draft Local Plan stipulates that development adjoining an SDL must meet at least one of the following criteria:

-) Exception sites: 100% affordable housing, including entry-level homes and affordable self-build/custom build homes
-) Single plots: affordable self-build or custom- build homes
-) Live-work development
-) Tourism / leisure development, subject to criteria⁴.

² Stroud District Housing Land Assessment 2018

³ As stipulated in the Settlement Role and Function Update 2018

⁴ P51 Draft Local Plan 2019

- 1.11. Exception sites form an important role in the draft Local Plan for supplying more affordable housing. Specifically, for Tier 1-3 settlements, the Local Plan suggests some 'limited development' at small and medium sized sites immediately adjoining the SDL will be allowed to meet identified local need such as for first time buyers, self-build, custom build and rural exception sites. A rural exception site is defined as being for small sites outside the settlement development boundary for up to 9 dwellings to meet local affordable needs.
- 1.12. The site allocation PS38 located at Wickwar Road is outside of the existing Kingswood SDL yet does not stipulate that development ought to fulfil any of these criteria. This lack of specification allows for purely market housing to be developed on the site, which does not contribute to the village and district's need for affordable housing.
- 1.13. Kingswood Parish Council would at least expect that a commitment is made to affordable housing on the site as well as a resolution to capacity issues relating to local primary school places (which will be touched on in a later section of this document).
- 1.14. We therefore consider Core Policy CP3 to be unjustified and inconsistent with its own criteria given the decision to locate growth at Kingswood and outside of its SDL. Kingswood should not be designated as a Tier 3a hierarchy status purely by virtue of being near a Tier 2 settlement.
- 1.15. This links to the next topic of representations which relate to **site allocations** and the additional sites being pursued for development since the 2018 update of the Settlement Role Hierarchy.

2. Site Allocations and Methodology

Policies to which this section relates:	Statutory	Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.
	NPPF paragraphs	14 b), 23, 65
	Draft Local Plan	<ul style="list-style-type: none">) Core Policy CP3- Settlement Hierarchy) Core Policy CP5- Environmental development principles for strategic sites) Delivery Policy DHC5- Wellbeing and healthy communities) Delivery Policy EI12) Site allocation- PS38) Delivery Policy DHC1- Meeting housing need within defined settlements
	Kingswood Neighbourhood Plan	<ul style="list-style-type: none">) Policy SL1: Kingswood settlement development limits boundary) Policy SL2: sustainable development characteristics

- 2.1. The Kingswood Neighbourhood Plan and Parish Council encourages ‘windfall’ and infill development within the settlement boundary through opportunities for conversion and extension of existing buildings. The Neighbourhood Plan sees no reason to prevent such development provided it achieves the Plan’s sustainable development goals, and is consistent with the Village Design Statement, the Conservation Area Statement and the Local Plan as a whole.
- 2.2. The Stroud District Council (SDC) Strategic Assessment of Land Availability (SALA) was first released in 2016 since the last Strategic Housing Land Availability Assessment (SHLAA) was prepared in 2011. The purpose of the SALA is to assess the appropriateness and deliverability of sites that are submitted via a Call for Sites process.
- 2.3. Table 2 summarises the sites that have been submitted and assessed for development since the first SALA in 2017. This information conveys the level of interest in developing sites surrounding the village often despite the conclusions of past SALAs that a site is inappropriate for development- please see highlighted text in the table below:

Kingswood Parish Council- Stroud District Draft Local Plan Review 2020-2040

Table 2: Summary of sites submitted and assessed for development 2016 to date.

SALA No/ Address	SALA Status	Draft LP Allocation	No of Houses	Interest from developers?	Reason for Rejection?
KIN001- Land North of Pennwood Lodge	Rejected 2017	N/A	unknown	Yes	The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site, beyond the strong valley floor boundary to the settlement and Conservation Area. Development may impact on the flood zone in the valley floor. There are therefore physical constraints and potential impacts preventing sustainable development in this location.
KIN002- Land south of Vineyard Lane	Rejected 2017	N/A	unknown		The land is not suitable for housing, employment or community development because of the high landscape sensitivity and significant archaeological potential of the site. It is considered that development would adversely affect the historic landscape character as well as compromise the flood zone in the valley floor. There are therefore physical constraints and potential impacts preventing sustainable development in this location.
KIN003- Land south of 13 & 15 Hillesley Road	Rejected 2017	N/A	unknown		The land is not suitable for housing or employment development because of the landscape sensitivity of the site. It is considered that development would detract from the open pastoral character of the area from views from local footpaths and minor roads. There are therefore potential impacts, as well as access and accessibility issues, preventing sustainable development in this location.
KIN004- Land at Hillesley Road,	Rejected 2017	N/A	unknown		The land is not suitable for housing or employment development because of the landscape sensitivity of the site. It is considered that development would detract from the open pastoral character of the area from views from local footpaths and minor roads. There are therefore potential impacts, as well as access and accessibility issues, preventing sustainable development in this location
KIN005- Wickwar Road, Kingswood	Future potential seen in 2017	PS38 in 2019 Draft LP	50	Yes	This site could be developed for low density development typically comprising detached and semi - detached dwellings at an average density of 20/25 dph, and the suggested yield is 35 - 45 dwellings.
KIN006- Chestnut Park Kingswood	Rejected 2017 for duplication avoidance	Already being developed	62	Yes	Planning permission has been granted and therefore the site has been excluded to avoid double counting.
KIN007- Land off Charfield Road, Kingswood	Rejected 2017	N/A	51 in 2017 SALA 59 houses approved	Yes	The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site, extending development over onto the skyline and highly visible to the west and north west. The potential impact would therefore prevent sustainable development in this location.
KIN008- Land north of Charfield Road	Rejected 2017	N/A	95	Yes	The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site. Development would significantly extend the settlement form into the open vale countryside on higher ground and is inappropriate within the wider landscape. The potential impact would therefore prevent sustainable development in this location.

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KIN009- Neathwood Yard	Rejected 2017	N/A	150		The site is located more than one field from the settlement boundary.
KIN010- Land and yard at Walk Mill Lane, Kingswood	Future potential 2018	PS39 in 2018 Stroud District Emerging Strategy	50	Yes	This site could be developed for low density development typically comprising detached and semi - detached dwellings at an average density of 20/25 dph, and the suggested yield is around 50 dwellings. The existing depot is considered suitable for redevelopment for employment uses typically comprising a mix of single storey/two storey offices, light industrial and small warehousing units.
KIN011- Land south of Westfield House, Kingswood	Future potential 2018		8	Yes	This site could be developed for low density development typically comprising detached and semi - detached dwellings at an average density of 20/25 dph, and the suggested yield is around 8 dwellings.
KIN012- New Mills, Wotton Road, Kingswood	Future potential 2019	PS47 in 2019 Stroud Draft LP	B1 use only	Yes	Taking account of the character of the site and its surroundings, the wider site offers scope for some 'campus' style development, along similar lines to the existing Renishaw site, with generous areas of open space. The northern field, east of the public footpath, and northern half of the field adjoining the B4058 could be developed for low/medium density employment development typically comprising a mix of single storey/two storey offices and light industrial units within a well landscaped campus environment. Scope for the adaptive re-use of the listed farmhouse and other farm buildings of heritage value and/or the redevelopment of existing non- historic buildings on a similar footprint and/or some infill within the farm group subject to its scale, massing and detailed design.
KIN013- Land north and west of 10 - 14 Charfield Road	Rejected 2019	N/A	80+	Yes	Site forms part of larger site previously assessed as KIN008. The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site including the visual setting of the listed Langford Mill House in a key view from Wotton Road. Development would extend the settlement form into the open vale countryside on higher ground and is inappropriate within the wider landscape. There are potential impacts therefore that would prevent sustainable development in this location
KIN014- Part land off Charfield Road, Kingswood	Rejected 2019	N/A	12	Yes	Site forms part of larger site previously assessed as KIN007. The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site, extending development over onto the skyline and highly visible to the west and north west. The potential impact would therefore prevent sustainable development in this location. See link and representations for and against delivering 80+ homes
		Total	566		

2.4. The key cause of concern for the Parish Council is regarding the proposed site allocation PS38 on Wickwar Road as set out in the Draft Local Plan. The site was submitted initially in the 2016 Call for Sites for 62 dwellings and identified in the 2017 SALA (KIN005 in Figure 1 map) as having future potential for 35-45 dwellings. It is located on Wickwar Road, on the south western edge of Kingswood village and includes a converted rural barn within its boundary.



Figure 1: 2017 SALA sites KIN001-KIN008



Figure 2: Site plan of PS38 Allocated site (source: 2017 SALA Future Potential Sit2)

2.5. Whilst this is the only site proposed for a housing development in the draft Plan in Kingswood, additional sites are still being pursued for development outside the settlement development boundary as Table 2 shows.

2.6. Neither the settlement development limit, nor the criteria for developing on an exception site outside of the boundary has been respected by SDC. For example, site KIN006 (as referenced in the 2017 SALA) was not allocated in the Local Plan but gained planning approval for 50 houses regardless.

2.7. Based upon the logic set out in paragraph 2.5 above, there is concern about the volume of houses that could eventuate from the sites identified as having ‘future potential’. Indeed, many have been rejected and deemed inappropriate for development yet are still pursued by developers and land promoters.

2.8. So far, the total number of houses that have been assessed through the SALA process comes to **566**. The total number of dwellings within ‘future potential’ sites comes to **170 houses**, 50 of which are already completed and/or under construction at Chestnut Park.

2.9. Therefore the collective impact on the village as a settlement of ‘small-medium size’ with a ‘basic’ retail provision rating and no strategic community facility rating (as per the Settlement Role and Function Study Update 2018) is not capable of sustainably servicing its existing or new residents.

2.10. This fundamentally goes against the adopted Neighbourhood Plan strategy to safeguard the social and physical infrastructure (including through management of capacity) that currently supports the local area, as well as Stroud’s own Settlement Hierarchy whereby only ‘limited’ infill and redevelopment will be permitted within the settlement boundary plus exceptional sites adjacent to the boundary⁵.

⁵ P133 of the draft Stroud District Local Plan

3. Environmental and Landscape Constraints

	NPPF paragraphs	172
Policies to which this section relates:	Draft Local Plan	<ul style="list-style-type: none">) Core Policy CP5- Environmental development principles for strategic sites) Core Policy DCP1- Delivering Carbon Neutral by 2030) Core Policy CP14- High quality sustainable development) Core Policy CP1A quality living and working countryside) Delivery Policy ES7- Landscape character) Delivery Policy ES8- Trees, hedgerows and woodlands) Delivery Policy ES12- Better design of places Policy SL1: Kingswood settlement development limits boundary
	Kingswood Neighbourhood Plan	<ul style="list-style-type: none">) Policy E2: minimising the environmental impact of development) Policy LA1: landscape character and locally important views) Policy FR1: minimising the impact of flooding from development

- 3.1. The 2016 Landscape Sensitivity Assessment (LSA) forms part of the evidence base for the updated Stroud Local Plan. Site PS38 forms part of area K03 in this study and is deemed to have a 'medium' sensitivity to housing development and 'high' sensitivity to employment use.
- 3.2. The site-specific assessment of 'K03' (an area which encompasses site allocation PS38) in the LSA identifies the key constraints as being derived from its pastoral character, the PROWs that pass through the area (and the impacted views from these if the site were developed) and its mature trees and hedgerows.
- 3.3. The SCD Sustainability Appraisal (SA) provides a conflicting narrative, stating that:
- "Some of the land which contains the draft site allocations around... Kingswood has not been assessed as part of the landscape sensitivity assessment for the District and does not lie within close proximity of the Cotswolds AONB. Therefore, an uncertain effect has been recorded in relation to SA objective 8 (landscapes/townscapes) for those draft site allocations"*⁶.
- 3.4. No further detail is given to indicate which site this is referring to, however this highlights the conflicting messages provided from SDCs own evidence base and the lack of detail provided in PS38 site allocation to mitigate the negative impact of development here.
- 3.5. Delivery Policy ES7 of the Draft Local Plan identifies how the Council will endeavour to protect and enhance the natural and historic character of the District, as well as setting out when development may be permitted.
- 3.6. These exceptional circumstances only refer to the location, scale and materials used and the retention of the natural features surrounding a development. This does not include other important features that could be impacted as a result of development such as agricultural soil degradation- as referenced in the LSA key constraints for this site.

⁶ P101 of the Stroud District Council Sustainability Appraisal 2019

- 3.7. Paragraph 6.50 of the SA refers directly to the green field site allocations PS38 and PS47 and the loss of large amounts of Grades 1,2 or 3 soil. The SA also suggests that 'overall a cumulative mixed minor positive and significant negative effect is likely'. This is obviously detrimental the environment, farm productivity and also conflicts with the character assessment undertaken around Kingswood, further adding to the inappropriateness of putting development in this location.

4. Sustainable Development (including transport and infrastructure)

<p>Policies to which this section relates:</p>	<p>NPPF paragraphs</p>	<p>Chapter 2- Achieving Sustainable Development Chapter 9- Promoting sustainable transport</p>
	<p>Draft Local Plan</p>	<ul style="list-style-type: none">) Core Policy CP3- Settlement Hierarchy) Core Policy DCP1- Delivering Carbon Neutral by 2030) Core Policy CP5- Environmental development principles for strategic sites) Core Policy CP6- Infrastructure and developer contributions) Core Policy CP7- Lifetime communities) Core Policy CP8- New housing development) Delivery Policy DHC2- Sustainable rural communities) Delivery Policy DHC5- Wellbeing and healthy communities) Core Policy CP12- Town centres and retailing) Delivery Policy EI12- Promoting transport choice and accessibility) Delivery Policy DEI1- District-wide mode-specific strategies) Core Policy CP14- High quality sustainable development) Core Policy CP1A quality living and working countryside) Delivery Policy ES7- Landscape character) Delivery Policy ES8- Trees, hedgerows and woodlands) Delivery Policy ES12- Better design of places) Stroud Sustainability Appraisal 2019) Stroud Sustainable Transport Strategy 2019
	<p>Kingswood Neighbourhood Plan</p>	<ul style="list-style-type: none">) Policy SL1: Kingswood settlement development limits boundary) Policy SL2: Sustainable development characteristics) Policy FR1: Minimising the impact of flooding from development) Policy T1A - Pedestrian connectivity and access) Policy T5 - Travel plans) Policy T2a - Encouraging active travel

Transport

4.1. Kingswood is identified in the Neighbourhood Plan's evidence base as being a 'dormitory settlement', having an above average proportion of residents travelling in excess of 60 kilometres to work. This promotes unsustainable lifestyles through high ownership of, and dependence on cars, and is therefore inconsistent with the objectives and policies of the national, county, district and neighbourhood planning strategies as set out below:

) Chapter 9 of the NPPF is dedicated to Promoting Sustainable Transport. Paragraphs 102 – 107 set out overall objectives aimed at plan-making so that new development can support cleaner air quality, less dependence on private car usage and manage patterns of growth to support active travel and achieve net environmental gains.

Paragraphs 108 – 111 of the NPPF are dedicated to approaches for considering development proposals which include providing suitable access and mitigating potential road capacity and congestion issues which might result from development. Specifically, Paragraph 110 asks that developments:

- Give priority to pedestrian and cycle movements
- Address the needs of those with disabilities

) The Gloucestershire Local Transport Plan 2015-2031 sets out objectives and expected outcomes of its transport strategy, which include reducing car trips and improving air quality.

) One of the Stroud draft Local Plan's development strategy 'headlines' is to support development that is in close proximity to employment and wider services and facilities to 'reduce our carbon footprint and improve the District's sustainability and self-containment'⁷.

) Also, in the draft Local Plan is a new Core Policy DCP1- Delivery Carbon Neutral by 2030 is designed to 'discourage the use of private car, irrespective of fuel source' amongst other amiable targets⁸.

) The Kingswood Neighbourhood Plan identifies the high-level of car ownership particularly amongst the newer developments. Furthermore, a travel survey which formed part of the evidence base for the plan showed that 75% of residents in these developments travelled alone to work in a car, leading to 'problems of sustainability, congestion, parking and pollution'⁹.

4.2. The decision to locate more development within Kingswood will generate a significant amount of additional traffic on local roads As evidenced from a survey¹⁰ of residents living in new developments within the village, 75% of people drive alone in a car to work each day, further reaffirming Kingswood's role as a 'dormitory' settlement (as described in the 2019 draft Stroud Local Plan).

4.3. Therefore, without further investment into the settlement's infrastructure (specifically schools and public transport) site allocation PS38 contradicts SDC's proposed Core Policy DCP1 (Delivering Carbon Neutral by 2030).

⁷ p26 of the Draft Local Plan 2019

⁸ P47. Ibid.

⁹ P67 of Kingswood Neighbourhood Development Plan

¹⁰ P67 of the Kingswood Neighbourhood Development Plan

- 4.4. The Stroud Sustainability Appraisal supports the improvement and provision of safe green walking and cycling links to connect Kingswood and Wotton-under-Edge¹¹. However, the reality for many residents of the Parish who are elderly with limited mobility, is that even if the walking or cycling connections are improved the distance between the two settlements will never be walkable or cyclable to these residents.
- 4.5. Site allocation PS38 is located ½ a mile from the centre of the village by a narrow pavement for pedestrians. There is currently no dedicated cycle network in or around the village on the twin lane B-road. This is not deemed to provide sustainable access by the community and therefore an unsatisfactory proposal for development.
- 4.6. The draft 2019 Stroud Sustainable Transport Strategy (SSTS) takes feedback from the 2018 consultation responses (Reg 18) into account, the primary issue being to ensure *“housing development is located in the right place, supported by the right services and infrastructure to create sustainable development”*¹².
- 4.7. The SSTS seeks to do this by:
-) Concentrating housing development where there is best access to services, facilities, jobs and infrastructure; and
 -) Concentrating new sustainable communities at locations where development can transform access to services and infrastructure.
 -) Inclusion of a greenway cycle and walking route, subject to further feasibility work.
 -) Designing safe walking and cycle routes and achieving a better public transport system
- 4.8. Whilst Core Policy CP8 ‘New housing development’ of the Draft Local Plan does require new housing developments to ‘have a layout that supports accessibility by bus, bicycle and foot to shopping and employment opportunities’¹³, clearly more must be done to support a change in *habit* of the people intended to live in new housing developments if commuter patterns are to change.
- 4.9. A solution to this would be to first, improve the frequency of bus routes in and out of Kingswood village, followed by improved awareness and communication that these facilities exist in order to encourage a more enthusiastic uptake of their use. For example, promoting a bus service to the 1,200 employees migrating to and from Renishaw Plc each day would have a positive impact on local congestion levels during peak commuting times.

¹¹ P48 Sustainability Appraisal Report for the Stroud District Local Plan Review 2019

¹² P56 of the Sustainable Transport Strategy

¹³ P149 Draft Local Plan 2019

Infrastructure

- 4.10. KPC understands the latest Infrastructure Delivery Plan (IDP) was produced in 2013 and updated in 2014 with a Funding Gap Analysis provided in 2016. There is not however an update provided as evidence to the latest Stroud Local Plan update.
- 4.11. As suggested in this report up to this point, the village infrastructure provision is not currently sufficient to support any significant growth aside from infill and windfall site development.
- 4.12. The 2016 Funding Gap Analysis reflects the 2015 Stroud District Local Plan. It concerns the delivery progress of the original 2013 IDP and demonstrates that a funding gap exists in Stroud District between the infrastructure required to support the development set out in the Local Plan, and the anticipated funding sources. The Gap Analysis assesses CIL-chargeable items including education, transport, flood risk management and healthcare.
- 4.13. An overall funding gap of £15,460,523 was identified across the District including all allocated sites and windfall sites. By proposing to concentrate development in unsustainable locations such as Kingswood, the need for additional infrastructure is exacerbated and the funding gap widens.
- 4.14. Paragraph 5.11 of the 2019 Sustainability Appraisal (SA) makes two unclear statements; it first refers to site allocation PS38 in Kingswood as providing new community or town centre uses, and second, suggests that the added positive impact on its 'Objective 6-services and facilities' would be minor due to the site allocation being located outside of a Tier 1 settlement or town centre¹⁴.
- 4.15. We take issue with this statement as site allocation PS38 is being allocated for housing with some associated landscaping, not 'new community or town centre uses' and would therefore be more likely to have a detrimental impact on Objective 6 rather than 'minor positive' impact due to the additional housing adding further strain on existing infrastructure¹⁵.
- 4.16. Additionally it has come to light that site allocation PS38 has been awarded a '+' score in the Sustainability Appraisal for Objective 6 'Services and Facilities' because it is located within a tier 3a settlement, which is only awarded for a settlement's proximity to a more connected settlement (Wotton-under-Edge). The justification for Kingswood to be rated as a Tier3a settlement is unsatisfactory and does not reflect the village's actual infrastructure provision.

¹⁴ P100 of Sustainability Appraisal Report for the Stroud District Local Plan Review 2019

¹⁵ Ibid.

5. Education Infrastructure

Policies to which this section relates:	Statutory	The Education and Inspections Act 2006
	NPPF paragraphs	Chapter 9- Promoting Sustainable Transport
	Draft Local Plan) Core Policy CP7- Lifetime communities
	Kingswood Neighbourhood Plan) Policy SL1: Kingswood settlement development limits boundary) Policy T1A - Pedestrian connectivity and access) Policy T5 - Travel plans

5.1. The Education and Inspections Act 2006 stipulates that part of the strategic role of a Local Authority is to:

-) Champion the needs of children and young people and their families; and
-) Facilitate the planning, commissioning and quality assurance of educational services¹⁶.

5.2. It is therefore the responsibility of Gloucestershire County Council (GCC) to assess the capacity and quality of the schools in and around the Parish of Kingswood, as well as guide the growth in the event of housing development and an expansion of the local population.

5.3. Kingswood Primary School is located in the centre of the settlement currently with a capacity of 119 pupils over seven-year groups which has been met through the existing catchment and local residents.

5.4. The Stroud Sustainability Appraisal 2019 report identifies short term issues as a result of new housing developments and recommends close monitoring of this as well as the capacity at KBL secondary school between Kingswood and Wotton-under-Edge¹⁷.

5.5. The report goes on to say *“there is likely to be a requirement to continue to hold discussions with developers to inform how they will make provision available locally”*¹⁸.

5.6. Vitally, the overall population of the District is increasing and is unlikely to halt or slow¹⁹. The short-term view of Stroud DC is that the District’s local schools will be able to absorb this natural growth plus the influx of people via housing site allocations is not a solution to an inevitable issue.

5.7. The draft Local Plan identifies in site allocation PS38 on Wickwar Road that there are ‘existing school capacity issues’²⁰ which would need resolving for the development of 50 houses to occur. It goes on to say that a *‘detailed policy criteria will be developed where necessary to highlight specific mitigation measures and infrastructure requirements*. However, until this policy has been developed and agreed between the Parish and Stroud District Council, this site allocation cannot be justified or accepted.

¹⁶ <https://www.gloucestershire.gov.uk/education-and-learning/school-improvement-strategy/statutory-context/>

¹⁷ P104 of Stroud 2019 Sustainability Appraisal

¹⁸ Ibid.

¹⁹ https://www.stroud.gov.uk/media/1096/stroud_profile.pdf

²⁰ P134 of the 2019 draft Stroud District Local Plan

5.8. GCC produced a Local Developer Guide which governs how planning contributions from developers and Community Infrastructure Levies will be applied within the County. The latest Local Developer Guide (adopted 2016) sets out Pupil Products for how many pupils are generated per house.

5.9. At a recent meeting in January 2020 with GCC, the updated figures from the soon-to-be-released 2020 update of the Developer Guide were shared. The Pupil Product per 100 houses are shown in Table 3 below:

Table 3: GCC Pupil Products 2016/17 vs 2020

	Students generated / 100 houses (developments 90+ dwellings) 2016/2017 update	Students generated/ 100 houses 2020 update
Pre-school	8	30
Primary	28	41
Secondary	17 (age 11-18)	20 (age 11-16)
Age 16-18	-	11

5.10. An assessment of recently approved and pending planning applications in Wotton-under-Edge has been carried out by the Parish Council with the following new dwellings being proposed. A summary of this assessment is set out in the table below:

Table 4: Recent development applications in Wotton-under-Edge

Development	Number of Houses	Date of Permission	Status
Fountain Crescent	22	22 Dec 17	Houses available from Jan 2020
Symn Lane	12	1 Aug 19	Not Started
Gloucester Street	8	4 Sep 19	Not Started
Berkeley Close	3	27 Nov 19	Not Started
Dryleaze Court	22	Awaited	Not Started
Mount Pleasant	5	Awaited	Not Started
Pitman Place	3	Awaited	Not Started
Total	75		53 Not Started

5.11. GCC have confirmed in a recent meeting with the Kingswood Parish Council (on 27th February 2020) that they anticipate this growth will put the Blue Coat Primary School in Wotton-under-Edge at capacity, thus removing this as an option for overflow for Kingswood students.

5.12. Based on the assumption that all 75 development applications gain approval in Wotton-under-Edge and site allocation PS38 in Kingswood is developed, a total of 125 new houses will require places for children in the surrounding schools. The number of places required have been calculated below based on the 2020 updated figures

Table 5: Pupil products for development in Wotton-under-Edge & Kingswood

	GCC 2020 Developer Guide Pupils Product/100 houses	Pupils Product: 75 houses-W-u-E	Pupils Product: 50 houses- Kingswood	Total Pupils Product: W-u-E development + Kingswood PS38
Pre-school	30	22.5	15	37.5
Primary	41	30.75	20.5	51.25
Secondary (11-16)	20	15	10	25
Post 16	11	8.25	5.5	13.75
Total	-	76.5	51	127.5

5.13. The total number of pupils generated from the potential 125 new houses to be built in the near future in Wotton-under-Edge and Kingswood must next be compared with local school vacancies. The following four schools are within the 1.5-mile catchment to Kingswood:

Table 6: Summary of local school vacancies

	Kingswood Primary School Vacancies	Blue Coat Primary School Vacancies	British Primary School Vacancies	KLB Secondary School Vacancies	Total
Pre-school	0	15	13	X	28
Primary	0	39	10	X	49
Secondary (11-18)	X	X	X	2	2

5.14. It can therefore be seen that the Pupil Product by the proposed new houses in Wotton-under-Edge and Kingswood will exceed the immediate capacity levels within existing schools. This does not take into account natural growth within the district.

5.15. Furthermore, Kingswood Parish Council have undertaken an assessment of known children already living within and around the more rural areas of the village (including siblings of children in Kingswood Primary school who must take priority) and have found that there are 17 children in need of a place at the school in September 2020.

5.16. This goes to show the immediate primary school capacity issues if development continues to occur in Kingswood without the addition of places within the catchment area.

Possible Solutions to Capacity Issues

5.17. To show willingness to arrive at a solution, two meetings have been held between KPC, SDC, GCC and the developers currently promoting sites in and around Kingswood village. The first meeting was held in July 2019 and the latest held in January 2020.

5.18. The purpose of these meetings has been to bring stakeholders together to understand each party's constraints, concerns and provide solutions to the short- and long-term issue of local school capacity- both in Kingswood and in Wotton-under-Edge.

5.19. Various solutions have been proposed in these stakeholder discussions, with only some showing potential signs of viability.

5.20. Importantly, GCC have estimated that it will cost £3.5m (excluding site cost) to build a new fully equipped 1 form entry school of approx. 210 capacity. The following table sets out the scenarios that have been explored with KPCs comments also included:

Table 7: Viability assessment of future primary school provision

Option	Scenario	Kingswood Parish Council's assessment
1	Continue with small scale development & assume natural demographic growth with school needs met in wider planning area.	As evidenced above, this is not a sustainable solution if children are to be able to go to school within the 2-mile walking distance threshold from Kingswood village.
2	Planned growth of 250 houses + sale of existing school (valued at £500 - £600k) to fund a new one form entry primary school (315 approx. total capacity).	By the time the 250 houses are complete, this new school with a capacity of 210 will be at capacity when considering the loss of the 119 places at Kingswood Primary school plus the 103 new places required to serve the new residents from the 250 new homes. This is based on the 2020 GCC Developer Guide figures (41 pupil product x 2.5 houses= 102.5).
3	Planned growth of 500 houses to fund a new one form entry primary school (in addition to Kingswood Primary School)	This level of growth in the village is not desirable for the parish community if it is to maintain its village characteristics. As well as more school places, all other infrastructure would require investment and expansion including retail, community and transport. 500 new houses would generate 205 primary school places which again, nearly fills a 210-capacity school and does not leave much room for natural growth levels or alleviate pressures on Kingswood Primary School.
4	KLB secondary school to expand and provide through-school	Potentially a good solution due to the location of KLB school being between both Kingswood and W-u-E, however no intentions or funding for expansion by KBL at present.

5.21. Overall, Kingswood Parish Council would like to see a considerable amount of new technical work by SDC and GCC so that a strategy for local schools can be more fully understood and evidenced prior to any conclusions being made about whether Kingswood being appropriate location for any more growth than what is already committed.

6. Community Survey and Appetite for Growth

- 6.1. In January 2020 Kingswood Parish Council went out to their community with a survey to assess the community's appetite for growth in their village and how this will impact on local infrastructure- with a particular interest in the pressure exerted on Kingswood Primary School.
- 6.2. The response rate was high, with 195 responses and the message has been made very clear. A summary of responses can be found below, with the results attached as an addendum.
- 6.3. The results show a clear concern for the impact of the development of 50 houses on Kingswood Primary School. When asked if participants support 50 houses in isolation of the impacts to other infrastructure, the opposition is not so strong with a 40/60 split in opinion against/for this development. However when participants were asked if they would support the same 50 houses to be developed if no additional capacity were added to the Primary School, resulting in children having to attend school in Wotton-under-Edge, support for development decreased by nearly 20% with a 23/77% split in opinion against/for.
- 6.4. 83% disagreed with Stroud DC's statement that it is a reasonable distance for students and their carers/parents to walk to Wotton-under-Edge twice a day for school.
- 6.5. 70% of participants recognised the site known locally as 'Cloverlea Barn' (site allocation PS38) as being their first preference for development of 50 homes. Whilst 87% regarded highway improvements to be their main priority for investment if 50 new homes were to be developed. This was followed by 51% regarding 'Youth Provision' infrastructure important.
- 6.6. Overwhelmingly, 86% of participants do not support the development of between 300-500 homes if it meant a new school could be provided to replace Kingswood Primary School. However, in the scenario this did eventuate, when asked what other community facilities should be provided, investment in highways was top priority, with more and better-quality playing fields next and a new community hall as third.
- 6.7. With regards to employment use, 65% agreed that it is acceptable to utilise land west of Renishaw New Mills as an extension to employment land. However, with this, the community expressed a preference for improved cycling paths/pedestrian infrastructure in the area, an additional bus stop to the site, with improvements to the motorway junction and roundabout servicing the site too.

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Table 8: Community Survey Summary

Question	Response
Do you support 50 houses being built in Kingswood in the period 2021-2031?	39% Yes 61% No
If Kingswood Primary School remains at capacity resulting in children having to attend a school in Wotton- would you still support up to 50 houses being built in Kingswood?	23% Yes 77% No
Do you think it is reasonable for the emerging Stroud District Council's Local Plan policy to assume that primary children and their parents/carers walk from Kingswood to Wotton to attend school?	17% Yes 83% No
If you support further development in Kingswood and have answered Yes to question 1 and 2 please select your preferred location.	<ul style="list-style-type: none"> - Cloverlea Barn on Wickwar Road- (up to 50 houses)- 70% 1st Choice - Land to the north of Charfield Road (up to 150 houses)- 28% 1st Choice - Land accessed from and adjacent to Walkmill Lane (up to 150 Houses)- 12% 1st Choice Land adjacent to Kingswood House Wotton Road (No of houses not known)- 2% 1st Choice
What Community Benefits would you expect to see from a development of up to 50 houses?	<ul style="list-style-type: none"> - Highways improvements especially in respect of pedestrian safety such as crossing control and other highways improvements. - 87% - Youth Provision- 51% - Improvements to the Playing Field provision- 44% - Improvements to the village hall- 44% Other- 43%
Would you support between a minimum of 300 houses up to 500 houses being built in Kingswood if a new primary school were to be provided. This option would be subject to a suitable and available site being found for a replacement primary school in Kingswood and funds being made available from Gloucestershire County Council.	Yes- 14% No- 86%

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<p>1. What other community improvements would you expect with between 300-500 houses. Please tick all that apply</p>	<ul style="list-style-type: none"> - Highways improvements including pedestrian crossings and car parking provision- 82% - An additional playing field or additional to accommodate the increase in community numbers- 55% - A new village hall fit to accommodate the increase in community numbers plus a separate area for the parish council- 51% <p>Other- 48%</p>
<p>Do you agree with the inclusion of the land west of Renishaw New Mills to be used as an extension of the employment site at Renishaw?</p>	<p>Yes- 65%</p> <p>No- 35%</p>
<p>What Community benefit would you expect to see as part of this extension</p>	<ul style="list-style-type: none"> - Improvements to the pedestrian footpath and cycleways- 79% - Improvements to public transport including the provision of a bus stop at Renishaw- 69% - Improvements from Jct 14 of the M5 to the Renishaw Roundabout and beyond to Wotton under Edge- 53% - Improvements to the safety of the Renishaw Roundabout- 52% <p>Other- 35%</p>