

Stroud Local Plan Written Representations
Siobhan Baillie MP

MATTER 1

Question 11: Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and statutory consultation requirement? Has all relevant and available evidence been made available for consultation, at the various stages of Plan preparation?

Written Representation: I submit this note as the Member of Parliament for Stroud to reflect the local views that have been communicated to me during the draft Local Plan process.

Many constituents have contacted me with a range of concerns that indicates the draft Plan has not been prepared in accordance with the Statement of Community Involvement (SCI).

The Local Government Association guide to engagement refers to the Gunning Principles. Significant feedback has been provided by constituents, community groups and statutory consultees such as parish and town councils throughout the numerous consultations.

At various stages of the process, constituents have told me that the information made available by the council was not provided in a timely manner to communities (who naturally have limited resources compared with other parties). Had there been clearer notice of when consultations were commencing, members of the community would have been able to plan accordingly.

Community groups have expressed concerns that the council did not properly consider what would be an adequate time for consideration and response. The council chose to only offer minimum statutory consultation periods at times but on occasion, they extended the consultation under pressure.

The lack of care taken in relation to consultation was especially detrimental during the pandemic as it was extremely challenging for communities to come together to create submissions. They were unable to meet in person and unable to raise awareness with those who are not online. Constituents were also understandably distracted by the pandemic. This impacted community involvement.

The Gunning Principles state there must be sufficient opportunity for consultees to participate in the consultation. It is widely accepted that the length of time given for consultees to respond should vary depending on the subject and extent of impact of the consultation. The council should have understood this and accordingly agreed to longer consultation periods at each stage of the process.

Further, while everybody appreciates the constraints of lockdowns during the pandemic and the desire to move forward, given the unprecedented nature of the last few years in addition to the planning legislation going through the Houses of Parliament at the moment, it is concerning that the council rejected the option of pausing the Local Plan. Other areas that are creating a new Local Plan have paused or ceased the process to

ensure their constituents and elected local representatives are in the best possible, most informed position to make such significant decisions about the future of their area.

Through engagement with constituents, community groups and parishes, I have been advised of numerous issues in relation to the council's approach to community engagement. I have highlighted some points below that relate directly to the requirements of SCI but these are not exhaustive.

- Local people who did not have easy access to the internet thought they were being kept out of the process.
- The Regulation 19 consultation restricted responses to a completion of an online form. The SCI states "We will take reasonable steps to ensure sections of the community that don't have internet access are involved and their views are captured". Constituents raised this issue with the council during the consultation period. Myself and others knew that this would not be accessible for large parts of the community, particularly the elderly, and it did not align to the SCI. District Councillors also raised this issue with the planning team. The process was eventually changed to allow other communication methods to be used but the damage had already been done.
- During the pandemic, the council did not communicate all options to engage, nor were there sufficient online conferences, workshops, discussion groups or focus groups.
- The process timetable was not kept up-to-date on the council website.
- Documents were not easy to locate and version control was inconsistently applied.
- Documents were reported to be missing on the website and/or added late.
- There was no attempt to make technical documents more easily understandable to aide community involvement. This is in contrast to other council consultations.
- The SCI sets out who must be consulted at key stages of plan production. Not all statutory consultees were invited to participate in the Regulation 18 consultation.
- Some respondents to the consultations were not added to the database and therefore were not kept informed of progress.
- Although significant progress has been made by a number of communities throughout the District, the hard work and local input to Neighbourhood Development Plans during the past 3 years does not appear to be reflected in the evidence presented in the Examination Evidence.
- Serious questions are being raised about evidence that community engagement has led to policy or site allocation amendments. As a result, the plan making process is perceived to have been pre-determined at the outset. The consultation reports produced by Stroud District Council do not appear to have given 'conscientious consideration' to the consultation responses before decision have been made.

- Public comments were not published in a timely manner. The council have not explained how comment have been taken into account of the next steps at stages. Where comments were missing or added late, no clarification has been provided as to how or whether the information has been taken into account to inform decision making on the Plan.

With reference to my response to the Planning White Paper (PWP) 2020 'Planning for the Future'. This proposed a greater emphasis on effective community involvement in planning and in particular to ensure good faulty 'front-loading' of engagement.

The PWP referenced a desire to 'democratise the planning process by putting a new emphasis on engagement at the plan-making stage' and to '... create great communities through world-class civic engagement and proactive plan-making' (PWP, 2020: P20-21).

I support this approach but unfortunately my constituents have not had the opportunity to be involved in a 'world class' civic engagement. It is a great shame.

Many people in my communities have worked hard to consider proposals and provide detailed responses for the council after spending hours trying to navigate the complicated planning system. This has been made more difficult by patchy or late information from the council and an increasing belief that none of the consultations really mattered which is why it did not matter how they were conducted.

The knowledge, enthusiasm and local people's desire to play their part in how our District will develop has sadly gone largely unrewarded. Constituents feel ignored, let down and disenchanted.

MATTER 2

Question 4: Is the spatial strategy justifies by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?

Written Representation: I submit this note as the Member of Parliament for Stroud to reflect the local views that have been communicated to me during the draft Local Plan process.

The spatial strategy focuses on new settlements rather than distributing housing growth throughout the District. Constituents, Parish and Town Councils and community groups have provided evidence to highlight why a dependency on growth points would result in unsustainable patterns of development.

In particular, there is a heavy reliance on strategic sites on the A38/M5 corridor. Since its creation, the spatial strategy does not appear to have been amended to reflect feedback in relation to specific site issues and strong challenges.

Communities want to see a more dispersed spatial strategy approach. More than 4,200 dwellings (50% of total housing supply) is proposed to be delivered on sites located within the Berkeley cluster.

Question 8: Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?

Written Representation: I submit this note as the Member of Parliament for Stroud to reflect the local views that have been communicated to me during the draft Local Plan process.

It is a serious point of challenge that inadequate consideration has been given to paragraph 119 of the National Planning Policy Framework (NPPF). This states policies should set out a clear strategy for housing, making as much as possible of brownfield or previously developed land.

The council's strategy to date has placed a significant reliance on greenfield site provision in our District. The council has also not satisfied constituents that spatial strategy approach supports the council's Carbon Neutral 2030 strategy due to the loss of greenfield.

Nationally, the Houses of Parliament are currently considering new planning legislation. Both the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities have both recently confirmed a 'brownfield first pledge' and that national policy gives 'substantial weight to the value of using brownfield land'.

Question 11: Will the spatial strategy promote the vitality of town centres in the District and support a prosperous rural economy, as required by national policy?

Written Representation: I submit this note as the Member of Parliament for Stroud to reflect the local views that have been communicated to me during the draft Local Plan process.

By relying on proposed significant new settlement allocations, this puts extensive pressure on some small towns, with unanswered accessibility, employment, parking and transport concerns playing a large part of local anxieties. It is not therefore believed that the council has used the spatial strategy to promote the vitality of town centres or focused on creating a prosperous rural economy.

This is of course at a time when small town centre high streets and local businesses need support and carefully planning to survive.

MATTER 3

Question 17: Paragraph 65 of the Framework states that 'strategic policies should also set out a housing requirement for designated neighbourhood areas....'. The Council's evidence details that there are 17 neighbourhood areas within the District with 10 made Neighbourhood Plans (NP).

The Council's Topic Paper on Neighbourhood Planning (EB5) explains that as no made or emerging NP allocate housing sites, housing requirements are to be set through site allocations in the Plan currently under our examination.

- A) Is this approach consistent with national policy, particularly with regard to paragraphs 65-67 of the framework?**
- B) Is it clear which sites are within each defined neighbourhood area and what the proposed housing requirements in these areas would be?**
- C) What are the implications of these proposed housing allocations on the designated neighbourhood areas and any emerging or made NP?**

Written Representation: I submit this note as the Member of Parliament for Stroud to reflect the local views that have been communicated to me during the draft Local Plan process.

Neighbourhood planning provides communities with local powers to collaboratively develop and shape development and growth where they live and work. It is developed to meet their needs and their priorities.

Many communities in the Stroud District have worked extremely hard to develop (or to start to develop) their own neighbourhood development plans. I feel strongly that this work culminates in some of the most carefully thought through and balanced planning policy any local area can have.

Unfortunately, the Draft Local Plan has decided not to recognise or support the significant contribution that Neighbourhood Development Plans can make towards the delivery of the District's housing land supply. Communities have seen the council ignore Neighbourhood Plans in specific planning application decisions but with the draft Local Plan, I have been told that there appears to be a wilful refusal to pay much attention to them at all.

The Draft Local Plan is based on a spatial strategy that is reliant on the provision of new strategic allocations. There is a missed opportunity to deliver sustainable, more dispersed development based on local housing needs and views of communities.