

From: [REDACTED]
Sent: 16 December 2020 16:42
To: _WEB_Local Plan
Subject: Stroud District Local Plan review - Draft Local Plan - Additional housing options consultation

Follow Up Flag: Follow up
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Categories: Consultation response

Dear sir/madam,

I am writing in response to the review of the Stroud District Local Plan and specifically with reference to the additional 'housing options and sites' dated October 2020.

It is understood that national planning policy provides a broad range of advice in terms of maintaining a sufficient supply of land to meet housing need.

The NPPF is clear that for plan-making the presumption in favour of development means providing plans that meet the full objectively assessed need for housing with sufficient flexibility to adapt to rapid change. I understand that process, and understand also that Stroud, as the local planning authority, can currently demonstrate a 6.56 year supply of housing based on the existing standard calculation methodology. However, as acknowledged through the November 2020 update on housing land supply, it is accepted by the council that this figure is not based on a full and comprehensive reassessment of housing land supply, not least because of the ongoing Covid pandemic. Therefore, it is not unreasonable to consider that the figure could realistically be significantly higher than the quoted 6.56 year figure, especially where a more generous windfall allowance is included; not an unreasonable suggestion given the consistency of delivery across the borough.

Notwithstanding the above, I appreciate that your consultation is based on further changes to national planning policy, potentially increasing the housing requirement from 1050 homes to 2040 homes between now and 2040.

In answer to your specific questions:

Question 1

Which strategy option(s) would you support, if additional housing land is required?

Q 1a Option A – Intensify – YES

The government's approach is one of sustainability. Basing the approach on existing stock will help to reinforce development in existing urban areas, thereby ensuring that new homes can maximise existing infrastructure such as public transport, schools, medical facilities and shops.

The revised method of calculation identifies 76% of local housing need nationally focused in urban areas. This will make the most of transport hubs, support the objectives of brownfield-first and gently densifying urban areas, including building upwards where appropriate. Intensification is therefore an eminently sensible option of achieving a large part, if not all of the additional housing requirement that may or may not exist.

Q 1b Option B – Towns and villages - YES

As above, albeit to a lesser extent, and therefore less strategic, smaller sites can cumulatively contribute significantly to the housing requirement. Existing towns and villages, on a proportionate level, could conceivably cope with small

levels of growth that would itself benefit from existing infrastructure. Any growth should however be proportionate to the scale and type of town/village and not result coalescence, given the importance of the open countryside and the contribution itself makes to the prosperity of the borough.

Q 1c Option C – Additional growth point - NO

Additional growth points will inevitably result in the development of the open countryside (as defined by planning policy). Both the existing and emerging local plan advocate a hierarchical approach to development with the open countryside at the lowest end of that hierarchy. This is an approach supported by national planning policy, emphasising the crucial role that sustainability plays in the planning system. Additional growth points would directly contradict this long held and currently maintained, largely on a national level and certainly on a local level, approach.

Q 1d Option D – Wider dispersal - YES

Wider dispersal largely follows my thoughts on option 1b with the crucial emphasis on proportional growth. Provided this is executed sensibly, without the coalescence of villages or settlements then this would represent a sensible option but it would be critical to ensure that sites are selected that take advantage of existing infrastructure and that by proxy, any sites devoid of services and facilities are discounted.

Q 1e Option E – Would you support a hybrid / combination option? (see Q2)

Yes. Refer to question 2.

Q 1f Option F – Can you suggest another strategy / spatial option for the identification of additional housing land?

N/A

Question 2

If you answered yes to Q1e above, please explain which of the spatial options (AD) you would like to see combined in a hybrid strategy, and why?

The level of growth, as envisaged by the government amendments, is excessive, but I appreciate this is not the correct forum for a discussion on that matter. What it does suggest however, is that a single option is most likely to not provide the expected housing requirement, unless of course, unrealistic additional growth points are accepted as the preferred option for delivery.

It would therefore be sensible to seek to intensify growth, in a proportional manner, in existing allocations, towns and villages and through wider dispersal. The National Planning Policy Framework introduces three dimensions to 'Sustainable development' (Economic, Environmental & Social), and advises that they are interdependent and need to be pursued in mutually supportive ways. By combining options for intensification, inappropriate development in the countryside at the quantum proposed can be avoided, thus limiting the potential impact on the environment and by proxy therefore, sustainable development.

Question 3

Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged? - YES

Question 4

Which strategy option(s) would you support, if a reserve site (or sites) is required?

Q 4b Option B – Towns and villages - YES

As 1b

Q 4c Option C – Additional growth point - No

As 1c

Q 4d Option D – Wider dispersal - YES

As 1d

Q 4e Option E – Would you support a hybrid / combination option? (see Q5)

Yes

Q 4f Option F – Can you suggest another strategy / spatial option for the identification of a reserve site / sites?

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Question 5

If you answered yes to Q4e above, please explain which of the spatial options (BD) you would like to see combined in a hybrid strategy, and why?

As 2

Question 6

What should trigger a reserve site (or sites) coming forward?

A delay in an allocated Local Plan site receiving planning permission? - NO

Under the current system a site allocation in an adopted Local Plan establishes the principle of development. Many of the detailed issues relating to the delivery of development are unknown at plan-making stages. Delays in receiving planning permission are not uncommon and it would be reasonable to expect such delays on large allocated sites that, regardless of their allocation, maintain a complex raft of issues to be resolved before permission is granted.

On that basis alone, it would be premature to allow a reserve site to come forward because of delays to the granting of planning permission.

Failure to deliver housing at the build rates set out in the Local Plan? - YES

The failure to deliver housing at the build rates set out in the Local Plan appears to be largely developer led. Therefore, if build rates continually fall below those identified at planning application stage there should be consequences, but this should be carefully controlled and managed by the local authority and not determined by the arbitrary build out rates of developers.

Another trigger (please specify):

It should be considered that the Local Plan will provide sufficient flexibility and contingency to the Plan target, even at the upper levels required by the new calculation method.

Reserve sites should therefore only be identified to provide contingency for a lack of delivery on allocated sites by a certain point in time. Any reserve sites should be restricted by policy to come forward only after a predetermined event so to stop land coming forward before that date and concurrently with other sites.

In conjunction with the delay trigger, there should be a stronger emphasis on build out methods. Planning applications should include an implementation timetable agreed between the local authority and site developer.

There should be incentivisation to submit full applications and to deliver to the implementation timetable and consideration should be given to fiscal mechanisms. As an overall approach, this will likely avoid the need for reserve sites to come forward.

Question 7

Do you support or object to the development of the sites identified?

7a BER016 Hook Street Farm, Berkeley - OBJECT

A large part of the site is located within Flood Zone 3 (as defined by the Environment Agency) and while flood defence mechanisms could be used to control flood risk to a degree, the combined environmental impact on adjoining clusters of development would warrant an objection to this site.

7b BER017 Bevans Hill Farm, Berkeley - SUPPORT

A cluster of development at the quantum proposed is a sensible approach to growth. The development would not result in the coalescence of villages and could be designed to maintain the openness of the open countryside where it is located.

7c HAR017 Land at Sellars Road, Hardwicke - SUPPORT

While the gap in the street scene creates an attractive break in development the site is nevertheless otherwise unconstrained and proportionally, the level of growth appears to appropriately reflect the level of services and facilities available locally.

7d STR065 Beeches Green Health Centre - SUPPORT

The site is located within the urban area (the Stroud Town Centre Neighbourhood Plan Area) and mixed-use proposals for residential and extra care accommodation would correspond with the prevailing land use. The level of growth is proportionate to the surroundings and the site is therefore appropriate for the level of development proposed.

7e WHI012 South of Hyde Lane, Whitminster - SUPPORT

The infrastructure, and specifically the access road is not particularly conducive to an intensification of residential use but the quantum of development proposed is sensibly pitched. There must however be some concern about the accumulation of sites within the Whitminster cluster, with PS45 and PS46 already allocated.

Question 8

Are there any other sites that you would like to be considered for future housing development?

No

Question 9

Do you support or object to the development of the potential growth points identified, or any sites therein? - OBJECT

9a PGP1 Land at Grove End Farm, Whitminster. Including SALA sites WHI007 and WHI014.- OBJECT

The general approach to housing development nationally is that by focussing development in urban areas, new homes can be sure to maximise existing infrastructure. This potential growth point is located entirely within the open countryside for the purposes of the local plan where a hierarchical approach to development is applied.

In this case, the housing requirement should not override policies of rural restraint because the requirement can be met by other means and therefore, the policies that direct development to the urban area should be prioritised.

Perhaps more pertinently, the distribution of housing proposed by this growth point focusses the entire additional housing requirement in this location, surely not a sensible plan for the rural area.

It is of course acknowledged that the proposed allocation aims to take advantage of existing transport links but by the very nature of the rural road network, the substantial increase in road traffic would be likely to cause increased traffic on inappropriate rural roads and/or pressure to expand highway capacity with resulting urbanisation of the rural area and /or serious degradation of the environment/bio-diversity and increased danger for road users and pedestrians and cyclists.

In addition to the above, infrastructure problems are not limited to highways. New homes at the quantum proposed need schools, health, and other services which are not available in the local area. If these facilities are provided in the rural area, as is proposed through the allocation, the intensification of activity will contribute to the urbanisation of the rural area.

New housing, both market and affordable should be achieved close to and within major urban areas, where high density housing can be provided on previously developed land close to services, shops and employment. Such an approach would be consistent with the principles of sustainable development ingrained in the National Planning Policy Framework. The proposed distribution strategy is directly contrary to the principles of sustainable development.

Accordingly, please accept this representation as an objection to the scale and distribution of housing proposed at site WHI014. The proposed development of the site would not constitute sustainable development, would result in loss of rural character, urbanisation, increased traffic and intensification of use and and harm to community cohesion and bio-diversity.

9b PGP2 Broad location at Moreton Valence / Hardwicke. Including SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009. - OBJECT

The site is more palatable than 9a because it is more closely associated with the built-up areas of Quedgeley and Kingsway to the north/north-east. However, the quantum of development will most likely exacerbate this highway pressure point and would therefore similarly fail tests of sustainability. A more sensible approach would be to apply a more modest approach to growth points, significantly reducing the quantum of development, particularly because the housing need can be met without placing undue pressure that growth points will create. A hybrid approach that disperses the requirement will therefore clearly represent an eminently more sensible approach.

Question 10

Are there any other sites that you would like to be considered as a future growth point?

No

Question 11

Do you have any comments to make about the Sustainability Appraisal that accompanies this consultation document?

None beyond those raised above.

Kind regards

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