

Date: 19 July 2021  
Our ref:  
Your ref:

Property Consultants  


Planning Services  
Stroud District Council  
Ebley Mill  
Ebley Wharf  
Stroud  
GL5 4UB

Dear Sir or Madam,

### **Representation for the Stroud District Local Plan Review (SDLPR) Land to the North of Bath Road, Leonard Stanley**

In accordance with Question 53 of the Pre-Submission Draft Local Plan (Regulation 19) consultation response form, we would like to promote the above site for development, in the upcoming Submission Plan.

This representation has been put forward to illustrate why the site should be considered for a residential allocation and why there is a greater need for proposed housing allocations in Leonard Stanley.

#### Location and Site Background

The site measures circa 8.45 hectares and adjoins Leonard Stanley's existing settlement boundary. The site is bounded by an unclassified road to the west, open countryside to the north and by existing houses to the east and south on Severn Waters and Bath Road.

As set out in the Pre-Submission Draft Local Plan, under Core Policy CP3 (pg. 55), Leonard Stanley is classified as a Tier 3a settlement (Accessible Settlement with Local Facilities). Tier 3a settlements are relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self-containment.

The site has formerly been submitted and assessed by Stroud District Council (SDC) under the 2017 Strategic Assessment of Land Availability (SALA). The site's reference is LEO004.

Comments provided by SDC suggested that 'although the site is not policy compliant, sensitively located development on the western part of the site, set back well south of the skyline hedge and maintaining a clear visual gap on Bath Road for housing or community uses could be appropriate in the future should the Local Plan strategy identify the need for growth in the location'.

Further comments go on to recommend that an area of 2.4 hectares is developable for circa 60 dwellings, between 2022 and 2024. Given the above comments provided by SDC about the site's potential yield and timeframe it could be developed, we are a little surprised that the site hasn't yet come forward as a proposed residential allocation.

### SDC's Housing Requirement

The Emerging Strategy identifies the need for at least 12,600 new dwellings based its standard methodology. Of this figure tier 3a settlements (which includes Leonard Stanley) accounts for the provision of 3,995 dwellings.

Out of all the tier 3a settlements, circa 68% of this proposed growth (2,700 dwellings) is directed towards Newtown & Sharpness over the next plan period.

The Stroud District Settlement Study Update – May 2019, contains information which has been used to determine the emerging local plan's settlement hierarchy. Each settlement has been analysed based on its access to local and strategic services.

In this document, Leonard Stanley has been given an overall accessibility score of 'fair', in comparison to Newtown & Sharpness which is considered to have a 'very poor' overall accessibility score.

It is somewhat questionable why so much housing is proposed in Newtown & Sharpness and debateable whether the proposed housing will be delivered over the next plan period (up to 2031).

Due to external factors, recent build out rates have underperformed, meaning that Stroud's over reliance on the delivery of the Newtown & Sharpness allocation, could result in a deficit to their housing supply.

As a result, the large strategic allocation proposed at Newtown & Sharpness should be distributed more evenly across other tier 3a settlements (including Leonard Stanley), which are considered to have better access to strategic and local facilities.

A desktop appraisal of significant issues on and around the site has been undertaken to inform this representation:

#### Landscape

The site is not set within any sensitive landscape designations (ie. Cotswold AONB, SSSI and SAC). The latest SDC Landscape Sensitivity Assessment has identified that the site has a medium sensitivity to housing. Comments provided by SDC have suggested that housing maybe possible providing houses are set significantly back from the skyline hedge to the north and mitigation of trees and additional planting are placed on this boundary and to the west.

[REDACTED] limited if any ecological benefit. The ecological benefit of the site is likely to relate to boundary features of the site, which will both be retained and improved by new tree planting in any future development.

#### Access

Access to the site can be gained from Bath Road to the south and from an unclassified road to the west.

There are numerous bus stops located along Bath Road and Seven Waters, that provide direct services to Stonehouse, Stroud and Cheltenham (Service 66). Comments provided by SDC state that the site has good

potential access to local roads and there is a pavement on Bath Road and bus stops that provide good access to services and facilities in the local area.

In terms of public rights of way, there is a footpath which runs through the eastern part of the site. This is referred to as Leonard Stanley Footpath 8.

#### Drainage

Environment Agency Flood Risk mapping for land-use planning indicates that the entire site is in flood zone 1. This indicates that the overall site has a low probability of flooding (less than 1 in 1,000 annual probability of river flooding) and can be developed.

#### Heritage

The open gap on Bath Road, which forms part of the site to the east, is located adjacent to two Grade Listed buildings. The Listings are referred to as 'the Grange and Flats (ID: 1090731)' and No. 2 and No. 4 Elmend (ID:1090739). Any future scheme will need to retain a buffer of open space around these heritage assets.

#### Affordable Housing

The adopted Stroud Local Plan sets out that there is a shortfall of affordable dwellings and that an additional 446 per annum are required. Any future scheme will comply with any relevant policies set out in the local plan.


#### Summary

In considering the above, there would appear to be no overriding physical constraints or potential impacts preventing a sensitively located development for a medium-large scale residential allocation.

Bruton Knowles would like to express that the site is under single ownership and that it is immediately available and deliverable over the next 5 years. For these reasons the site would make an appropriate residential allocation, in line with SDC's comments provided in the 2017 SALA.

Should you have any queries or require any additional information, please let me know.

Yours sincerely



David Smart BSc (Hons) MSc MRTPI  
Planner