

Part B – Please use a separate sheet for each representation

Name or Organisation: Kingswood Parish Council

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	Policies Map
		<ul style="list-style-type: none"> • Core Policy CP2: Strategic Growth and Development Locations • Core Policy CP3: Settlement Hierarchy • Residential Site Allocation Policy PS38: South of Wickwar Road • Employment Site Allocation Policy PS47: Renishaw New Mills 	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	✓
4.(2) Sound	Yes		No	✓
4 (3) Complies with the Duty to co-operate	Yes		No	✓

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see our representations for our full response.

In summary, we consider the Local Plan to be unsound for the following reasons:

- It is unclear as to why a Plan period of 20 years has been chosen. The start date of 2020 does not allow adequate lead in time to ensure that adequate engagement and due diligence has taken place.
- The SA Report for the Additional Housing Options (October 2020) is too broad-brush and does not adequately assess options for the Local Plan's growth strategy. As stated within the Sustainability Appraisal Report for the Stroud District Local Plan Review: Pre-submission Draft (2021), the methodology adopts a 'policy-off' approach. With this in mind, it is wholly unclear as to how the SA can effectively assess the environmental, social and economic effects of implementing Core Policy CP2 (Strategic Growth and Development Locations) in the absence of any real information regarding the location of proposed sites and/or the quantum and distribution of development earmarked for each settlement.
- Insufficient evidence to support SA conclusions that smaller settlements can only accommodate small levels of development – this shows clear disregard for the complexities of planning. Indeed, some smaller settlements may be able to accommodate such growth, but others such as Kingswood lack the level of infrastructure required to support such growth.
- The cumulative effects chapter of the SA Report does not take into account the huge level of potential growth coming forward through South Gloucestershire's Call for Sites process. Much of this growth is located less than 5km away from Kingswood and could lead to many adverse social, environmental and economic effects if the impacts are not adequately evaluated.
- Policy PS38 (South of Wickwar Road) cannot be considered a sustainable development opportunity due to the following: a) the policy proposes very low density development (therefore this cannot be considered an effective use of land), b) local schools are at capacity and cannot accommodate the level of growth earmarked for the site, c) the policy offers no resolution to the education capacity issues, nor does it provide sustainable travel solutions for school children, d) Kingswood lacks other essential infrastructure such as healthcare and cultural facilities which are critical in ensuring that future needs are met.
- Policy PS38 (South of Wickwar Road) would cause significant pressures on the local road network – particularly Wickwar Road. Currently there are no plans to mitigate these issues.
- The Parish Council is concerned that Policy PS47 (Renishaw New Mills) may not be viable due to the recent uncertainty regarding the future of Renishaw Plc and the potential decline of the manufacturing industry within the district.
- Existing public transport in Kingswood is very poor and is not capable of meeting future needs, as based on the growth set out in the Local Plan.
- Kingswood straddles two separate housing market areas and therefore it is unclear as to whether the Local Plan presents accurate housing need figures for Kingswood.
- The local housing need figure for Kingswood has already been met through existing incomplete commitments in Wotton-under-Edge. There is no need to develop in Kingswood as Stroud has 6.56 years of housing supply.

- The impacts of Covid-19 have not been addressed within the Local Plan – this is particularly evident in the housing chapters where changing lifestyles have not been factored into local housing need projections.

We also conclude that the Local Plan has failed to comply with duty to cooperate procedures due to the following reasons:

- We cannot locate any SDC Authority Monitoring Report (AMR) available on SDC's website setting out what Duty to Cooperate activities the Council has undertaken
- Despite SDC posting outdated documents from its previous local plan on its website to attempt to evidence that it has discharged the duty, these lack substantive and up to date evidence that 'active', 'ongoing' and 'constructive' cooperation took place from the start of the preparation of the Local Plan. If further evidence of cooperation were to be submitted by SDC in the lead up to, or after submission of the Local Plan then this would clearly demonstrate that the Local Plan and its policies were not informed by this engagement – which is, after all, the entire reason for the Duty to Cooperate.
- There are no up to date, published and agreed SOCGs with any neighbouring local authorities to support the Pre-Submission Local Plan.
- There is no evidence provided by SDC regarding the Duty to Cooperate with South Gloucestershire Council (SGC). There is no publicly available Statement of Common Ground between SDC and SGC which addresses the potential cross-boundary strategic matters of the Stroud Local Plan. This oversight represents a clear dereliction of duty by Stroud District Council.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- The SA needs to adopt a 'policy-on' approach in order to adequately assess the range of effects of the different options put forward.
- Further evidence required to clarify the rating 'tiers' of the Settlement Hierarchy. At current, Kingswood should be downgraded to a smaller settlement status.
- Policy PS38 (South of Wickwar Road) should be removed as an allocation for the reasons set out within our full representation.
- Local housing need for Kingswood needs to be reassessed, taking into account our earlier comments in relation to existing supply within Wotton-under-Edge, SDC's confirmed 6.56 years of housing supply and the complexities of Kingswood falling within two housing market areas.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your

suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Kingswood Parish Council confirms that it wishes to participate in the Local Plan Examination hearing sessions. Given the scale of strategic development proposed at Kingswood its extensive representations, and its role as a statutory consultee, KPC considers it critical that it has the opportunity to provide further input into the Local Plan Examination process including the hearing sessions to respond to other evidence and arguments put forward in the presence of the Planning Inspectorate.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date: 14.07.2021