



## COMMENTS ON SDC DRAFT LOCAL PLAN FOR CONSULTATION

### Main Questions from Consultation

- *Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs? **Yes. The "Hybrid" approach seems to offer a good balance to meeting the District's future housing locations.***
- *Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies? **No***
- *Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text? **Yes. See detailed comments.***

### Detailed Comments

#### **Key Issues**

The key issues are generally supported and it is good to see new emphasis on the environment. On Delivery Issue No.37, it is not clear how the Canal Restoration will provide widespread health and wellbeing to residents across the district and, on this basis, how it can be considered to be value for money to most taxpayers?

#### **Draft Strategy Headlines/Housing Distribution**

The mention of Kingswood (2.16, 2.48) as a lesser growth site is noted but any permitted development must not be allowed to encroach on the green space between the village and the settlement limits of Wotton-under-Edge.

Allowing some development sites adjoining settlement limits at Tier 1 to 3 settlements (2.18, 2.36) will need careful policy management to avoid exploitation by developers. In the absence of a Neighbourhood Plan, who will decide what the "specific identified local needs" are (will Parishes have a role?). In deciding planning applications does this policy, or the local environmental constraints, take precedence?

Transport improvements (2.29) for the South of the District are also needed and the re-opening Charfield station in South Gloucestershire (2.33) would be a major benefit to the area and should be actively supported, along with the other stations.

#### **Town Centres**

How has the recent investment in Merrywalks (2.64) demonstrated (at the present time) the (business) feasibility of the improvements? Other towns would benefit from such District Council investment to increase their market share (2.65) but Wotton is being offered no direct financial support. It is agreed that town centre strategies, which support the evolution of the High Street, are needed (2.66).

Proposals from the Town Centres Report (Page 40) are generally welcome, although any town centre car parking charges must be tailored to the individual towns (and not be uniform across the district). Any

change of retail use to other use would need careful management to avoid damaging the town's retail offering.

Support for markets in towns is welcomed (Page 42) as is the recognition of the need for additional parking in Wotton and the priorities identified in the town's 2016 Community Plan. It is not clear how the "Greenway" would have a material impact on the health of the High Street unless, perhaps, Charfield Station re-opens.

### **Policy DCP1**

The inclusion of new policies to combat climate change are welcomed but surely achieving a carbon-neutral Stroud District by 2030 should be stated as a target rather than a certainty. Certainly, any new developments must be carbon-neutral by then, or before.

### **Policy CP3 (Tier 2) Wotton-under-Edge**

The diagrams depicting how policy CP3 will apply to different the different tiers (Page 52) are very helpful. Wotton has settlement limits which protect the AONB by preventing development which would encroach on the surrounding hills and valleys. Finding exception sites which don't cause harm to the landscape would be challenging. Policies for protection of the AONB (ES7) and environment (CP15) should take precedence when considering adjacent to SDL planning applications under Policy CP3. The planning process also needs to include effective public consultation to assess the extent of local support for exception sites which seek to satisfy "specific identified local needs". Despite the policy statements, there is concern that the added flexibility of allowing building adjacent to the SDL might be exploited by predatory developers.

### **The Wotton Cluster**

The Town Council would welcome further discussion to help refine the key issues and top priorities for the next iteration of the Local Plan (Page 133). The currently stated issues are certainly not in priority order and it would be appropriate to separate "Designing safe green walking and cycle routes" from "achieving a better public transport system" which would satisfy different local needs (with improved public transport being a higher priority). Also, it is not the "design" of safe walking and cycling routes that is important but their "delivery".

The recognition of traffic flow and congestion problems in the town is welcomed but there is concern that there are now no longer any stated parking requirements (Appendix C) for new developments or inclusion of specific requirements for Wotton (ES12, 5.67 in current Local Plan). Planning Officers continually ignore these existing standards when permitting applications in the town and, therefore, it would be appropriate to include specific requirements for Wotton in the new Local Plan to help avoid a making the town's on-street parking worse.

Within the timeframe of the new Local Plan, there are likely to be capacity problems at KLB Secondary School as well as the primary school in Kingwood (Page 133).

It is not at all clear how Wotton (in particular) will "benefit from .....on-going revitalisation of Dursley and its town centre (Page 134) when this will increase local competition. Both town centres need support from SDC!

The hills surrounding Wotton are also significant physical planning constraints, perhaps more so since development has now taken place along much of the flood plain (Page 138).

The statement about Landscape sensitivity (Page 138) is not understood. All of the land is in the AONB and further development would be either uphill into the Cotswolds to the North and East, cause spillover along the escarpment to the South or take development into the Coombe valley. All of the landscape is “sensitive”.

The statement on facilities (Page 138) suggests singular services whereas Wotton has, inter alia, four pubs, two banks, two GP surgeries, two dentists, several places of worship and two primary schools. Wotton also has thriving Arts and Heritage Centres.

Is it true (excluding Renishaw New Mills in Kingswood Parish) that “Wotton has a significant employment role” (Page 138) now that all but two of the town’s industrial areas have been lost to housing?

The development strategy (Page 138) is supported but, as mentioned above (Policy CP3) there are few areas where any adjacent to SDL development could take place without damaging the landscape.

### **Policy HC2**

This policy (Page 154) could exacerbate the town’s on-street parking problem. Is it possible to add a caveat that in considering permission, account will be taken of any local parking problems?

### **Policies HC3, HC4 and DHC3**

See comments for Policy CP3 above. Any adjacent to SDL development must take into account its impact on the landscape value. This requirement should be added to the list of criterion.

### **Policy HC1**

This policy (page 156) seems to contradict Policies HC3, HC4 and DHC3 by allowing general (rather than “exceptional”) development on adjacent to SDL locations. The policy needs strengthening.

### **Policy HC5**

Surely if the property to be replaced is a heritage asset then development should not be permitted?

### **Policy DHC6**

Surely the community should have a say in whether open space/sports facilities might be available for development. This should not be based on a developer’s assessment. Is a NDP the only way to designate Local Green Spaces which are of importance to the community (Page 160)? Other mechanisms should be available.

### **Policy CP12**

Is the list of priorities for improving retail facilities in each of the towns, shown in the Table, Section A (Page 165) in priority order? If so, it is not accepted that Wotton is shown as the lowest priority of the four centres. All town centres are of equal importance.

### **Policy EI12**

The lack of specific parking standards (Page 173) for new dwellings (Appendix C) is of concern, particularly for Wotton where there are well understood on-street parking problems. A specific provision for Wotton, requiring a minimum of two parking spaces per new dwelling should be included. The 2015 Local Plan made a specific statement about the parking problems in Wotton (Para 5.67).

## **Policy DE11**

The policy mentions specifically (Page 173) working with GCC, but action with South Gloucestershire to achieve sustainable transport improvements in the South of the district, such as re-opening Charfield railway station.

The intention to undertake a district wide parking strategy (Page 174) is noted but this must look at the local situation in each location and must not seek to impose a uniform policy across the district (as was the case with the previous proposal). Wotton's parking problems are well known and action to reduce on-street parking to improve traffic flow would be welcome.

## **Policy ES1/ES2 and DES3**

The new measures to help achieve the Council's CN2030 target are welcomed.

## **Policy ES7**

The "national interest" (Page 187) consideration should apply to "significant" developments (say 10 or more dwellings) not just to "major" developments. This policy needs to take precedence over CP3, HC3, HC4 and DHC3.

## **Appendix C**

The removal of specific requirements (Page 208) for vehicle parking standards is not supported. In the past, Wotton's requirements for two parking spaces for each new dwelling have been ignored by many developers and not challenged by Planning Officers. The lack of any specific standards will make it harder to prevent unsatisfactory proposals which could increase Wotton's on-street parking problem. Wotton's requirement for a minimum of two parking spaces per dwelling should be included as a specific provision.

In the policy statement (Para 1) the proposed parking provision also needs to take into account the local parking situation as an extra consideration.

The requirement (Para 8) for allocated parking spaces to be provided within easy walking distance of the dwellings they intend to serve is supported but it is suggested that the statement is amended to state, additionally, that: "ideally, allocated parking should be adjacent to the dwelling served". As well as being more acceptable to residents this would facilitate EV charging.

The new provisions for EV charging are welcomed (Page 209).

*Wotton-under-Edge Town Council  
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**Additional Comments from Wotton-under-Edge Town Council - 18<sup>th</sup> Feb 2020**

The draft plan requires the Wotton Cluster to accept 50 new houses in Kingswood and it is known that at least three other developers are pursuing sites for several hundred more houses. These proposals take no account of available school capacity (Annex A) or the new housing developments, totalling 75 houses (Annex B) that have received recent planning permission in Wotton, 53 of which have yet to start. It is known that Kingswood primary school is already at capacity and has a waiting list. Wotton’s two primary schools together have 66 places available currently (based on available GCC statistics). Using the “New Development Guide”, 100 houses creates a demand for 41 primary school place. Therefore, based on these figures, the yet to be occupied developments in Wotton will absorb 31 of these places, meaning that only 35 places would be available for new developments elsewhere in the Wotton Cluster – insufficient to meet the demand for the 50 planned new houses in Kingswood, plus those sites being pursued by other developers. Any new housing proposals must take into account amenities in the area and it is clear that insufficient school capacity exists in the Wotton Cluster for any significant development. Furthermore attention must be paid to actual year classes within primary schools, where some year group numbers are exceeded.

It is well known that Wotton has traffic flow and parking problems which are particularly bad during school drop-off and pick up times. Making families from Kingswood drive their children to and from school in Wotton will exacerbate these problems and must be avoided either by increasing school capacity in Kingswood or reducing the housing numbers planned there.

**ANNEX A**

**AVAILABLE PRIMARY SCHOOL PLACES IN WOTTON-UNDER-EDGE AND KINGSWOOD**

School	Capacity	Actual	Date	Vacancies
Kingswood	119 (17x7)	119	October 2019	0
British School	210 (30x7)	165	October 2019	45
Blue Coat	315 (45x7)	294	October 2019	21
<b>Total</b>	<b>644</b>	<b>595</b>		<b>66</b>

**Primary School Available places in Year groups**

School	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Total
Blue Coat	15	8	4	-1	3	-7	-1	21
Kingswood	0	2	0	-3	-1	1	1	0
British	13	12	0	9	1	0	10	45
<b>Total</b>	<b>28</b>	<b>22</b>	<b>4</b>	<b>5</b>	<b>3</b>	<b>-6</b>	<b>10</b>	<b>66</b>

**ANNEX B**

**RECENT HOUSING DEVELOPMENTS 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
<b>Total</b>	<b>75</b>		<b>53 Not Started</b>