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15th December 2020

Local Plan Review  
The Planning Strategy Team  
Stroud District Council  
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**Sent via email to local.plan@stroud.gov.uk**

Dear Sir/Madam

## **STROUD DISTRICT LOCAL PLAN REVIEW DRAFT PLAN ADDITIONAL HOUSING OPTIONS PUBLIC CONSULTATION - LAND TO THE SOUTH EAST OF STROUD ROAD, PAINSWICK**

I write on behalf of [REDACTED], in respect of Draft Plan Additional Housing Options Public Consultation which is currently taking place as part of the Stroud District Local Plan Review, between 21st October 2020 to 16th December 2020. This consultation has been prepared in response to the Government's standard method consultation, which has the potential to increase the amount of housing land required in Stroud District between now and 2040. This consultation looks at additional housing options and sites which could be brought into the emerging Local Plan, if the Government's standard method is confirmed.

This letter first responds to the consultation, including the options for the spatial strategy, the rationale for further housing growth in Painswick and why this cannot be accommodated by the proposed Washwell Fields Allocation, before setting out why Land to the South East of Stroud Road, Painswick (The Site) should be considered for future housing development.

The letter then provides a response to SALA 2020 Site Assessment of the site, setting out why Land to the South East of Stroud Road, Painswick (the Site) should be reconsidered for housing development, before reiterating a previous request for a minor amendment to Painswick's Settlement Development Limit.

### **Spatial Strategy**

Part 1 sets out a number of spatial options that could deliver additional housing growth. This includes:

- Option A: Intensify – Additional housing within the boundaries of sites identified within the Draft Local Plan.
- Option B: Towns and Villages – Further housing sites at smaller towns and larger villages.
- Option C: Additional Growth Point – a new growth point
- Option D: Wider Dispersal – a range of additional housing sites across Tier 2, 3 and 4 settlements.

The consultation paper indicates that there could be a need to find land for an additional 1,050 – 2,400 homes between now and 2040. In this context, it is considered that there will need to be a combination of the above options to deliver this level of growth.

## Approach to Painswick

### **Painswick**

In regards to the above, the Site would support option B as Painswick is identified in the Draft Plan as a Tier 2 Settlement – Local Service Centre, defined as having the ability to support sustainable patterns of living in the District because of the facilities, services and employment opportunities it offers. As stated in the draft plan, Tier 2 Settlements have the potential to:

*“These market towns and large villages have the ability to support sustainable patterns of living in the District because of the facilities, services and employment opportunities they each offer. They have the potential to provide for modest levels of jobs and homes, including through sites allocated in this Plan, in order to help sustain and, where necessary, enhance their services and facilities, promoting better levels of self containment and viable, sustainable communities”*

Painswick contains a number of services and facilities and therefore sits high on the settlement hierarchy in terms of its potential to accommodate growth. However, it only has an emerging allocation for 20 dwellings in the Draft Plan (Washwell Fields), and other Local Service Centres have received significantly larger allocations (the majority being of excess of 80 dwellings) which provide the opportunity to sustain greater indigenous and sustainable growth. There are also villages which sit lower on the settlement hierarchy which are expected to provide greater numbers of dwellings than Painswick, including Frampton-on-Severn, Leonard Stanley and Whitminster, amongst others. As such, the allocations within the Draft Plan do not reflect the settlement hierarchy in this regard. Whilst it is noted that Painswick is a constrained settlement, it is considered that there is potential for further growth in the Village in line with the settlement hierarchy. Further to this, the Draft Local Plan recognises that Painswick has an ‘important but vulnerable retail role’; as such, further housing growth in the Village would help to support these services.

### **Washwell Fields**

It is considered that planning permission will be delayed at the site due to access and heritage constraints and that the site is unable to deliver housing at the build rates set out in the Local Plan.

As set out in the Draft Plan for Consultation, draft allocation PS41 – Washwell Fields, is the only draft housing allocation to meet Painswick’s delivery of 20 units over the plan period. This is despite the site being found only suitable for a maximum of 10-15 dwellings in the Strategic Assessment of Land Availability (SALA) 2017.

The Washwell Fields site has a net area of 1.2 hectares, of which the SALA identifies the developable area as 0.9 hectares; this is due to the need for any potential development at the site to ‘keep at least 50m away from Washwell Farm to maintain a gap in the Cheltenham Road frontage and the integrity of the small folded valley at this point.’ Consequently, the SALA concludes on the development potential of the site that ‘the suggested yield is 10-15 units given the edge of settlement location and the need for landscape buffers.’

The Washwell Fields site therefore does not have the capacity to provide the quantum of development of up to 20 units as set out in its draft allocation. In this context, Land South East of Stroud Road is well suited to boost the supply in housing and provide for the shortfall in housing numbers in Painswick.

Notwithstanding the above, the subject site is better suited than Washwell Fields to deliver housing growth in Painswick, given the draft allocation’s access and heritage constraints which would likely cause a delay in an allocated Local Plan site receiving planning permission.

Access to the Washwell Fields Draft Allocation site would be gained via Lower Washwell Lane, as set out in its Call for Sites Submission Form. Lower Washwell Lane is a single-track lane with passing places. It has several blind bends with poor forward visibility and has no pedestrian footways at the western end, thus providing no safe pedestrian route from the allocation into the village. There appears to be no alternative safe pedestrian to the A46 Cheltenham Road and village centre. The junction of Lower Washwell Lane and the A46 Cheltenham Road appears to have limited visibility to the left and may require changes to the on-street parking in this location which would be a disbenefit to existing residents. The proposed access to Washwell Fields from Lower Washwell Lane is marked unsuitable for heavy vehicles due to the sharp bends and also the heavily sloping topography; it may therefore not be suitable as a construction access which will mean that construction delivery vehicles may have to unload on the A46 Cheltenham Road and smaller vehicles will have

to ferry materials to and from the site. Due to these points, we respectfully request that the council reconsider whether suitable and safe access for a development of up to 10-15 dwellings can be achieved at this site.

It is also considered that residential development at Washwell Fields would likely have an adverse impact on the significance of the Grade II listed Washwell House. The listing of this heritage asset makes it clear that the building presents its main front away from the road, i.e. facing Washwell Fields. Though this point is not considered in the SALA Site Assessment, residential development at the could have the potential to harm the significance of this designated heritage asset. Furthermore, the Draft Allocation is also located in close proximity to the Glyde House Conservation Area and would therefore have to meet the requirements of the Draft Local Plan Delivery Policy ES10.

In comparison, the subject site is free of these constraints and therefore represents a more viable location for housing delivery within Painswick. The below section demonstrates how suitable and safe access to the site can be achieved and there are no heritage assets in proximity of the site. Additionally, the subject site is no more constrained by landscape designations than the Washwell Fields Draft Allocation.

### Land to the South East of Stroud Road

The site is approximately 2 hectares of greenfield land, comprising of 2 paddocks. The site is bordered by the A46 to the north, residential properties to the east (including those within Painswick's Settlement Development Limit), King's Mill Lane and a residential property to the south, and greenfield and a residential property to the west. The location of the site is enclosed at appendix 1.

The National Planning Policy Framework (NPPF) states that:

*"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years."*

In this respect, the site is in single ownership and is being promoted by the landowner. There are no legal or ownership problems which could limit development, and therefore the site is available now.

The site is sustainably located for residential development with good accessibility to Painswick's local services, facilities and employment opportunities, as well as good public transport links between Stroud and Cheltenham. Additionally, the site borders existing residential development and Painswick's Settlement Development Limit and can therefore be considered a suitable extension to the existing community.

The site's location is one that developers will find attractive to bring forward for development; residential development therefore represents a viable future use for the site. Development on the site is therefore considered achievable.

In this context, the site is considered to be deliverable in line with the requirements of the NPPF.

Additionally, paragraph 68 of NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

Further to meeting NPPF's definition of deliverable, the site is relatively free from constraints. Where access is concerned, the site can be accessed directly from the A46 Stroud Road as per the existing dwellings to the north. A site access junction can be provided with suitable visibility splays for either DMRB standards for the current 50mph speed limit or at Manual for Streets standards at 30mph if the current speed limit was extended south in line with development. Extending the speed limit to the south would also allow the provision of improved footways fronting the site and the potential provision of a gateway feature on entrance to Painswick. The site can therefore be provided with safe and suitable access.

In terms of sustainable transport, the site is located approximately 100m from the bus stop on Stroud Road adjacent the cricket club, these bus stops allow access to the hourly Stagecoach 66 Gold service between Cheltenham and Gloucester via Stroud. Access to this bus service provides an alternative to travel by private car for both commuting and leisure trips. Therefore, from a transport planning perspective the site is sustainable being located within Painswick allowing walking and cycling to local services but also with access to public bus services to the wider local area.

The site is located, along with the entire village of Painswick, within the Cotswold Area of Outstanding Natural Beauty (AONB). The site is also relatively sloping from north to south. The design, layout and scale of housing would therefore have to be sensitive to this designation and constraints. The site is in flood zone 1 as defined by the Environment Agency's *Flood Map for Planning* service. There are no designated heritage assets that would be affected by residential development on site, nor is the site within the Painswick or Glyde House Conservation Areas, which is approximately 160m to the east. Existing utility services are available to neighbouring properties.

For these reasons we therefore respectfully request that Stroud District Council consider this site as a potential allocation for housing within the Stroud Local Plan, especially in the context where land for an additional 1050 – 2400 homes between now and 2040 may have to be identified

## Response to SALA 2020 Site Assessment

This section provides a response to the Council's 2020 Strategic Assessment of Land Availability (SALA) assessment of the site, under the reference PAI014.

The site was added to the list of rejected sites for the following reason:

*"This area is generally not suitable for development because of the likely high landscape impact, separating the core of the village from the countryside and the outlying sporadic development. As a gateway to Painswick the fields provide an historic landscape interest and context contributing to the character and setting of this settlement. "*

However, this reason does not apply to the eastern section of the site, which is suitable in landscape terms for delivering housing. The site was assessed as part of Landscape Parcel P05 Landscape Sensitivity Assessment which was commissioned to support the 2017 and subsequent SALAs. Whilst the above explanation for rejecting the site is accurate for most of the P05 area, the landscape sensitivity is clear that:

*"Carefully designed low-density housing may be able to be accommodated in the field north of Brook House north of King's Mill Lane. "*

The council's own assessment demonstrates that this section of the site can accommodate housing development in landscape terms subject to design and density considerations. We would therefore respectfully request that that the council reconsider their 2020 SALA assessment of the site as a rejected site to an additional and deliverable site.

## Amendment to Painswick's Settlement Development Limit

We would also like to take this opportunity to reiterate our previous request for a minor amendment to Painswick's Settlement Development Limit to include Briarfield House, Stroud Road, Painswick and its associate curtilage within the boundary. The suggested amendment to the limit is provided in Appendix 2.

In this context, we consider that an update to Painswick's Settlement Development Limit would better reflect the intended function of Settlement Development Limits, as opposed to the current boundary.

Paragraph 4.26 of the Stroud District Local Plan sets out the intended function of the Settlement Development Limits, it states:

*"Defined settlement development limits are shown on the policies map. They are essential to the application of many of the Plan's policies and seek to achieve the following:-*

- *To direct development to appropriate and sustainable locations across the District;*
- *To protect the countryside from isolated and inappropriate development;*

- *To ensure that new development is sympathetic in scale and location to the form and character of our settlements; and*
- *To prevent the uncontrolled expansion of settlements and potential coalescence.”*

The table below evaluates how an amendment to Painswick’s Settlement Development Limit to include the existing property at Briarfield House, Stroud Road, and its associated curtilage would be consistent with the Council’s intended function of Settlement Development Limits.

INTENDED FUNCTION	PROPOSED CHANGE TO SETTLEMENT DEVELOPMENT LIMIT
To direct development to appropriate and sustainable locations across the District	<p>The existing property is appropriately located as it borders the residential properties at Cotswold Mead on its north-east boundary, which are included in Painswick’s Settlement Development Limit.</p> <p>The inclusion of the property and residential curtilage within the Settlement Development Limit would offer a sustainable solution. The existing property is 700m (less than 10 minutes walk) from the centre of Painswick Village and its associated services and facilities. Additionally, adjacent to the exiting property’s West boundary on the A46 is the “Rugby Club” bus stop which provides regular services to Stroud (the 228 service) and Chletenham (the 66 gold service).</p> <p>Inclusion of the land within the Settlement Development Limit would therefore be appropriate given this context.</p>
To protect the countryside from isolated and inappropriate development	The proposed amendment includes the property Briarfield house and its associated residential curtilage (the garden of Briarfield House) as opposed to ‘open countryside’. As such, including this land within the Settlement Development Limit would not compromise this function.
To ensure that new development is sympathetic in scale and location to the form and character of our settlements	Inclusion of the property and residential curtilage of Briarfield House would be appropriate in the context of the surrounding settlement pattern which can be categorised as large detached dwellings set within generous plots. The existing property is therefore consistent with the form and character of the bordering properties that all fall within the Settlement Development Limit.
To prevent the uncontrolled expansion of settlements and potential coalescence	The inclusion of the property within the Settlement Development Limit could not be considered an uncontrolled expansion as it is an existing dwelling and in no way contributes to any potential coalescence.

For these reasons, it is considered that the proposed minor amendment to Painswick’s Settlement Development Limit to include the existing property at Briarfield House, Stroud Road, and its curtilage, is

entirely appropriate with the Council's stated intended functions of Settlement Development Limits. We therefore respectfully request that the proposed amendment to Painswick's Settlement Development Limit is made as part of the emerging local plan.

### Summary and Conclusions

This letter has set out that there is potential for further growth in the Painswick in line with the settlement hierarchy. It is considered that the proposed Washwell Fields Allocation will be unable to deliver this growth and planning permission will be delayed at the site due to access and heritage constraints and that the site is unable to deliver housing at the build rates set out in the Local Plan.

This letter has then demonstrated why the Land to the South East of Stroud Road, Painswick is better suited to deliver this growth and why the Council should consider the site as a potential allocation for housing within the Stroud Local Plan, especially in the context where land for an additional 1050 – 2400 homes between now and 2040 may have to be identified

Additionally, this letter has also provided a response to SALA 2020 Site Assessment of the site, setting out why Land to the South East of Stroud Road, Painswick (the Site) should be reconsidered for housing development, before reiterating a previous request for a minor amendment to Painswick's Settlement Development Limit.

I trust the enclosed information is adequate at this point however please do not hesitate to contact me should you require any further information.

Yours faithfully,



**For Ridge and Partners LLP**

# APPENDIX 1

TITLE NUMBER: GR87254  
SITE ADDRESS: Land on the South East side of Stroud Road, Painswick



— TITLE BOUNDARY

## APPENDIX 2



Requested change are shown in **red**. Existing settlement development limits are shown in **black**.  
(Source: *Stroud District Council Policies Map*)