

Please consider these comments provided in a personal capacity in relation to the Emerging Strategy of Stroud District Councils Local Plan:

Numbers - General Review. There is broad recognition amongst the population of Stroud District that housing provision should meet the needs of our communities. Government figures and census returns suggest the district as a whole will experience modest growth over the plan period. Using the revised methodology the number of new homes anticipated to be required is stated as 5700. The proposed 7405 as suggested in the Emerging Strategy consultation represents a 30% uplift on this estimate. Whilst it is acknowledged that some flexibility and headroom is expected, an additional 1705 houses is excessive. Early indications from the Office for National Statistics indicate that the original forecast numbers were an overestimate. As the final requirement is likely to be lower the Local Plan should reflect a more realistic figure. A 20% uplift on the original estimate would equate to 6840 houses. As the original estimate is likely to be revised downwards this would provide more than enough flexibility to satisfy inspection and any future variation in demand.

Dispersal. The Government require a minimum of 10% of allocations on sites of less than 1ha and there was an original requirement for a minimum of 20% (so the 10% figure is a real minimum). One would have thought therefore, that the 7405 additional houses suggested in the new Preferred Strategy, would include a minimum of 740 on sites of less than 1ha. In fact, there appear to be in the region of 120 which equates to less than 2%. An argument has been made that, when existing allocations and permissions granted are taken into account, the 10% figure is satisfied. However, the policy is explicit in indicating sites should be proactively allocated in Local Plans. Existing permissions include appeals, windfalls and infill sites. This does not meet the expectation that smaller sites will be assessed, planned and allocated proactively to maximise the potential benefits for communities looking to maintain sustainability whilst supporting build numbers. It is recognised that adopting a more flexible approach to development in smaller communities does carry risk and uncontrolled permission in our villages and smaller settlements would be unwelcome. There are however, positive opportunities. Dispersal should play a part and offer smaller communities the ability to grow themselves, share in some of the infrastructure benefits and maintain their own sustainability. Government policy, the revised NPPF (launched in July 2018) and other districts all recognise this. Cotswold District Council and Tewkesbury Borough Council have recently signed off their plans which both include specific proactive policies, recognised and approved at inspection, to allow smaller communities to grow. There are differences between these councils and Stroud that would need to be recognised by some adapted and tailored policy wording to limit risk. However, the challenge of meeting delivery numbers, the load otherwise strategic sites would need to bear and the opportunity to enable smaller communities to grow, remain sustainable and share in what benefits accrue should not be overlooked or ignored. The limited degree of flexibility introduced following rejection at the original Environment Committee where communities can have the ability to proactively grow as part of a truncated Neighbourhood Development Plan was a step in the right direction but not far enough. Further work needs to be urgently undertaken to identify appropriate policy wording that can enable good, high quality, limited and controlled small scale development.

Review of Strategic Assessment of Land Availability sites. A wide range of sites were put forward for consideration in the Strategic Assessment of Land Availability at settlements in Tier 3, 4 and 5 categories. Many of these were either not assessed because they are beyond Tier 3 or rejected on landscape grounds that now, when compared with the landscape damage potentially associated with other strategic sites, pale to insignificance. This approach and these sites must be revisited. Some of these sites provide the potential opportunity for timely build out by smaller developers to bridge the gap where larger sites require longer lead times for planning and infrastructure preparation. These sites would tend to support local builders and developers with consequent benefits to local suppliers, contractors and employment. Dispersal proposals discussed previously are supported by a majority of residents, communities and councillors. Sites at and lower than Tier 3 lend themselves to meeting the needs of smaller communities whilst providing variety in the type and location of homes. These sites help spread and distribute load on infrastructure and support build numbers required by the plan.

Duty to Cooperate. The requirement to cooperate is noted. I am aware of the Memorandum of Understanding that was agreed in 2014 between Stroud and Joint Core Strategy authorities (Gloucester City, Cheltenham and Tewkesbury Borough's). However, the legislation states clearly that it is a duty to cooperate not agree and the first priority for Stroud District Council should be to the people of this district. Land at Whaddon within the Stroud District could, should and must form a key part of the Local Plan and any request for cooperation should only be considered after a thorough and independently tested, approved and verified analysis of every site in, around and adjoining the JCS area. This includes other councils, especially the Forest of Dean and other areas erroneously currently excluded by the respective councils (i.e. Gloucestershire Airport). It is believed that there is capacity for in the region of 2750 homes at the Whaddon site. It is a highly sustainable location, well served with infrastructure and communication links with a range of existing employment in close proximity to this site. A significant allocation should be made in order to help address the requirement for housing numbers in Stroud District and to effectively rebalance (see below) distribution of housing within the plan.

Distribution. Much infrastructure across the district is at or near capacity. With this in mind it seems logical to manage any future pressure by spreading load and planning to limit congestion. However, the Emerging Strategy fails badly in this regard with almost 80% of the proposed development located in the far south of the district. On its own, this approach would raise significant questions regarding the proposal efficacy. However, whilst some existing or approved development will influence the north of the district this is dwarfed by proposals in the south. Significant ongoing and proposed strategic development is planned as part of the West of England Joint Spatial Plan in South Gloucestershire directly on Stroud Districts southern border at Buckover, Thornbury and Charfield. Additional strategic sites that will also add pressure at Yate and Coalpit Heath are planned together with significant proposals at Falfield and Wickwar. Development at these sites amounts to well over 10000 homes. These proposals would exacerbate an existing problem and put unsustainable pressure on Junction 14 of the M5 and the Almondsbury Interchange together with other local networks. Rebalancing can be achieved through dispersal (see above), reassessment of Tier 4 and 5 sites (see above), significant allocation at Whaddon and reassessment of sites in the south of the district to reduce numbers and impact.

Sharpness. The largest single allocation proposed in the Emerging Strategy is at Sharpness. Previous Chief Executive Officer of Stroud District Council, David Hagg, took the unwise decision to publicly state his desire for this major plan to go ahead and facilitated a range of meetings over a protracted time period to bring potential partners and stakeholders together. Perhaps in light of this there appears to be a degree of assumption that this plan is accepted and welcomed by local people with only detail to resolve. This is far from the case. Residents generally accept the need to play a proportionate part in meeting the housing needs of the wider district. However, the communities in and around Sharpness are dispersed settlements, rural in nature and feel and, by and large, that is how residents wish them to remain. Local Parish and Town Councils are almost unanimous in their opposition to the plans as currently conceived, highlight the potential negative impact on the viability of Berkeley as a local centre, question the viability of locating such development in a comparatively remote location, are concerned that the impact on any potential new affordable housing residents has not been assessed, addressed or understood and express doubt and scepticism regarding the promise of investment and infrastructure improvements. Many local people and growing dedicated local groups are broadly opposed to the plans as described in the consultation document and question the reality of some detail. Potential delivery in advance of any construction of the 'missing road link' between the A38 and the B4066 is a particular concern that has not been effectively addressed. Developers have also raised the prospect of utilising the former rail link as a 'green' transport service to any new development. This line terminates at The Prince of Wales which is 6km from the nearest railway station and solutions suggested to bridge this gap have not been properly resolved. It should also be noted that consultation on this most important proposal has been poorly advertised, very limited in extent and inadequate to fully gauge opinion and take on board or address legitimate concerns. Developers have made some late efforts to provide engagement with local people but the formal components exercised by the District Council have been insufficient to fully and properly test opinion. Repeated requests to officers for additional formal, dedicated consultation have been rebuffed. This is completely unacceptable and must be urgently addressed. Officers must properly and honestly engage with the community in order to fully assess the merits of the plan as proposed. Some dedicated, bespoke consultation is essential in order to help inform the next phase and shape details for any future allocation.

Wisloe. Please see separate submission.

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