



# **Kingswood Parish Council Representations to the Regulation 19 Stroud Local Plan**

July 2021

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## 1. Introduction

- 1.1. These representations provide a response, on behalf of Kingswood Parish Council (KPC), to the Stroud District Local Plan Review (Pre-Submission Draft Plan - Regulation 19 Consultation).
- 1.2. KPC considers the Local Plan to not be legally compliant due to Stroud District Council's (SDC) failure to discharge its Duty to Cooperate.
- 1.3. KPC considers the Local Plan's proposed spatial strategy and the proposed residential and employment site allocations at Kingswood to be unsound as the plan fails all the tests of soundness set out in the National Planning Policy Framework (NPPF) (Paragraph 36) which are set out below:
  - ***“Positively prepared*** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - ***Justified*** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - ***Effective*** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - ***Consistent with national policy*** – enabling the delivery of sustainable development in accordance with the policies in this Framework.”
- 1.4. KPC submits the following representations to SDC's consultation on its Regulation 19 Pre-Submission Draft Local Plan Review. Relevant policies to which each topic our representations relate are included in the box below each heading.

## 2. Plan Period

- 2.1. The Local Plan period of 2020 – 2040 is insufficient to cope with the extent of the strategic proposals contained within the proposed Local Plan. The NPPF states that *“strategic policies should look ahead over a minimum 15-year period from adoption (except in relation to town centre development<sup>1</sup>)”*. However, there is no justification provided by SDC as to why 2020 – 2040 is the selected plan-period. Given SDC's proposed strategic development at Cam, Dursley, Stonehouse and Stroud, including new settlement proposals at Sharpness and Wisloe (both within the Severn Vale), there is clearly a need

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<sup>1</sup> NPPF paragraph 22

for more lead in time to plan for this proposed new strategy which will require an enormous amount of funding, due diligence, community / stakeholder engagement and joined up planning in order to properly plan and deliver.

- 2.2. The Ministry of Housing, Communities and Local Government (MHCLG) recognises the need for longer plan periods in its recent consultation on proposed changes to the NPPF (30<sup>th</sup> January – 27<sup>th</sup> March 2021) where it proposes to amend paragraph 22 of the NPPF to require a minimum of 30 years where larger-scale development is proposed. The consultation document refers to new settlements specifically and the explanatory text in the consultation clarifies that ‘major urban extensions’ are also included as part of this (see excerpts from the consultation below). Whilst MHCLG’s consultation on the proposed changes to the NPPF provide a clear direction of travel for plan-making and that authorities will need to plan ahead for at least 30 years, the NPPF is already clear that 15 years is a minimum period and given the scale and complexity of growth proposed in this Local Plan we consider that the Local Plan period should cover at least 30 years from adoption.
- 2.3. Therefore, the plan period should be changed to 2020-2052. As a result of this change in the plan-period the majority of the Council’s evidence base will need to be reviewed and updated. Given the extent of time that will be required to update the evidence base and proposed policies we suggest that SDC not proceed with submission of the Local Plan in order to save the Council, the taxpayers and other key stakeholders a considerable amount of time and resources that will result from a Local Plan which is clearly unsound and not legally compliant.

Paragraph 22 has also been amended in response to the Building Better Building Beautiful Commission recommendations to clarify that councils who wish to plan for new settlements and major urban extensions will need to look over a longer time frame, of at least 30 years, to take into account the likely timescale for delivery.

*Figure 1: MHCLG’s Consultation on proposed changes to the NPPF*

22. Strategic policies should look ahead over a minimum 15 year period from adoption<sup>15</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

*Figure 2: MHCLG’s Consultation on proposed changes to the NPPF*

### 3. Duty to Cooperate

3.1. SDC has not complied with the Government’s legal test for discharging its Duty to Cooperate. Local authorities must fulfil the legal requirement to cooperate with the Duty to Cooperate prescribed bodies by “*engaging constructively, actively and on an ongoing basis*”<sup>2</sup> on cross boundary strategic matters from the commencement of preparing the Local Plan to submission of the Local Plan to the Secretary of State for examination. SDC has also failed to comply with the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>3</sup> which states that:

*“(6) Where a local planning authority have co-operated with another local planning authority, county council, or a body or person prescribed under section 33A of the Act, the local planning authority’s monitoring report must give details of what action they have taken during the period covered by the report.”*

3.2. 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.

3.3. Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by section 110 of the Localism Act 2011<sup>4</sup> requires the council to cooperate with other local planning authorities and other ‘prescribed’ bodies in preparing and developing development plan documents and other local development documents so far as it relates to a strategic matter.

3.4. 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 as explained in the NPPF: “*effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy*”<sup>5</sup>. The purpose of the duty is not to have a Statement of Common Ground, an SOCG is simply a way to demonstrate that effective and on-going work has informed the preparation of the Local Plan.

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<sup>2</sup> Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by section 110 of the Localism Act 2011 (2) (a)

<sup>3</sup> <https://www.legislation.gov.uk/ukxi/2012/767/regulation/34/made> (see 34(6))

<sup>4</sup> <https://www.legislation.gov.uk/ukpga/2004/5/section/33A>

<sup>5</sup> NPPF paragraph 26

3.5. In any case Planning Practice Guidance (PPG) states that authorities should make any statements of common ground (SOCG) available on their website by the time they publish their draft plan so that communities and stakeholders have a transparent picture of how they have collaborated:

*Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated.*<sup>6</sup>

3.6. As we set out below there are no up to date, published and agreed SOCGs with any neighbouring local authorities to support the Pre-Submission Local Plan. We briefly summarise the Duty to Cooperate documents SDC is presumably using to attempt to justify it has discharged the duty in the table for ease of reference:

- **Statement of Cooperation (between Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council and Stroud District Council) (2014)**<sup>7</sup>: This statement was signed in 2014 which was before the current Local Plan Preparation, was signed for the previous round of Local Plan making and does not fulfil the requirements of PPG. This is out of date and irrelevant for the current Local Plan Review.
- **Gloucestershire authorities Memorandum of Understanding (January 2015)**<sup>8</sup>: This document is out of date, does not meet the requirement of PPG and includes evidence relating to 2013 and 2014 which is clearly out of date.
- **Gloucestershire authorities Statement of Common Ground Report (March 2019)**<sup>9</sup>: This report is not a SOCG, it is simply a committee report resolving to prepare an SOCG between the six local planning authorities, Gloucestershire CC and GFirst LEP. The report states (see paragraph 4.2):

*“this project is in its earliest stages, therefore this report concerns the principles the project only and much further detail will need to be developed as the project progresses. As work on this project progresses Members will be updated. Further reports will be presented to individual authorities and GFirst LEP as further decisions are required. Final adoption of the SCG for Gloucestershire will need to be agreed by each constituent authority”.*

3.7. It also stipulates the consultation process that will need to be undertaken:

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<sup>6</sup> Paragraph: 020 Reference ID: 61-020-20190315 <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation>

<sup>7</sup> <https://www.stroud.gov.uk/media/1166282/stroud-jcs-statement-of-cooperation-august-2014.pdf>

<sup>8</sup> <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-review-evidence>

<sup>9</sup> <https://www.stroud.gov.uk/media/1166280/development-of-a-strategic-planning-framework-for-gloucestershire-march-2019.pdf>

*“the SOCG will be subject to a level of consultation which will need to be in accordance with the Statements of Community Involvement of each constituent local authority”.*

There is no evidence provided to support the Local Plan or Duty to Cooperate on the consultation process that was undertaken if there was indeed a consultation process at all.

- **Draft Gloucestershire Draft Statement of Common Ground (May 2021)<sup>10</sup>:** This document is a draft SOCG with no signatures and a blank ‘Action Plan’ with no details of actions, outcomes, actions, timeline, budget, or responsibilities. It does nothing to evidence how SDC has worked with its neighbouring authorities on strategic matters in preparation of its Local Plan. If anything, it is proof that cross boundary strategic matters have not been worked on in cooperation with its neighbours given the embryonic stage of the document.
- **West of England Joint Spatial Plan - Statement of Common Ground (October 2018)<sup>11</sup>:** This SOCG was prepared to support the failed West of England Joint Spatial Plan and clearly does not evidence the duty has been met with the authorities.

3.8. There is no evidence provided by SDC regarding the Duty to Cooperate with South Gloucestershire District Council (SGC). There is no publicly available Statement of Common Ground between SDC and SGDC which addresses the potential cross-boundary strategic matters of the Stroud Local Plan. This oversight represents a clear dereliction of duty by SDC. As such, the Local Plan is unsound on the grounds that SDC did not comply with paragraph 35c) of the NPPF and therefore in the absence of a statement of common ground there is no evidence to confirm that cross-boundary strategic matters have been *“dealt with rather than deferred”*. This is a very key consideration and failure of the Duty to Cooperate given the growth plans for SGC as we explain below.

3.9. Kingswood village centre is situated just 2km northeast of the South Gloucestershire District administrative boundary, thus benefitting from shared services and facilities in the nearby villages of Charfield and Wickwar (both of which lie within South Gloucestershire District). With this in mind, it is critical that the Duty to Cooperate has been effectively discharged to ensure that effective collaborative joint-working has taken place in a manner where cross-boundary strategic matters have been addressed by all vested parties, as per paragraph 24 of the NPPF.

3.10. The need to engage with neighbouring authorities is particularly apparent in the case of SDC, given the close proximity between Kingswood and the development activity within South Gloucestershire at Charfield (Land North of Wotton Road, appeal allowed for 121

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<sup>10</sup> [https://www.stroud.gov.uk/media/1485649/gloucestershire-socg-draft-may-2021\\_redacted.pdf](https://www.stroud.gov.uk/media/1485649/gloucestershire-socg-draft-may-2021_redacted.pdf)

<sup>11</sup> [https://www.stroud.gov.uk/media/1166281/dtc-socg-woe-and-stroud-with-signature\\_redacted.pdf](https://www.stroud.gov.uk/media/1166281/dtc-socg-woe-and-stroud-with-signature_redacted.pdf)

residential dwellings, South Gloucestershire planning reference number: P19/18327/O), in addition to sites put forward within SGDC’s Call for Sites process (2020), including the large sites of Tortworth Garden Village (3,200 units proposed), Buckover Garden Village (3,000 units proposed), Land to the South of Charfield (1,000 units proposed) and Land at East of Charfield (600 units proposed), as highlighted in Figure 3. Whilst these sites are not yet fully adopted within the emerging South Gloucestershire Local Plan, these sites have an estimated capacity of 7,800 homes, which, based on UK standard household size, would yield approximately 18,720 new residents within a 5km radius of Kingswood.

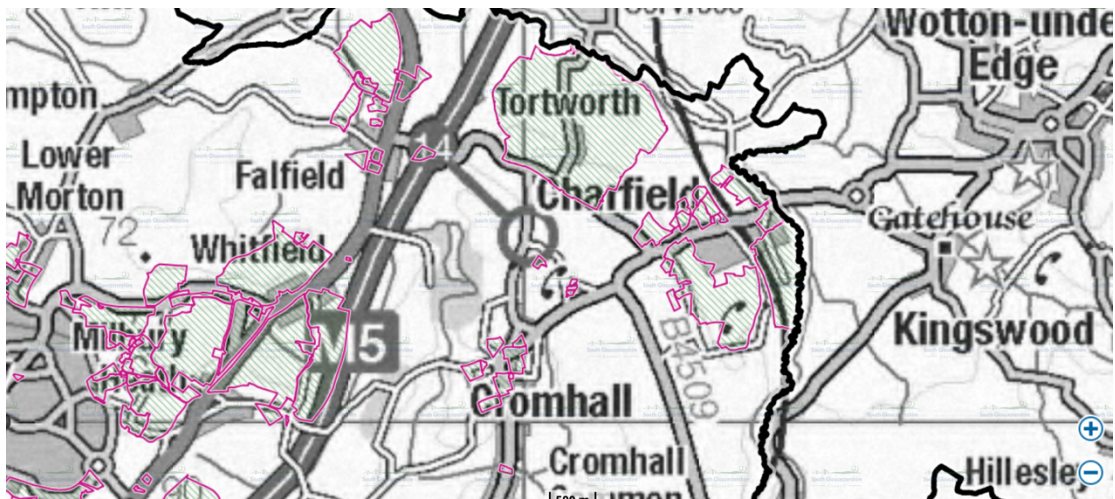


Figure 3: South Gloucestershire Call for Sites (2020) interactive map - proximity of large sites to Kingswood (SDC)

3.11. This is a pertinent issue, as, in establishing the lack of joint working between both SDC and SGDC, it is evident that a large proportion of South Gloucestershire’s identified housing need could be sourced from the aforementioned sites which lie in close proximity to Kingswood. This underscores a further two issues – a) the West Bristol SHMA<sup>12</sup> identified Kingswood as belonging to the Wider Bristol SHMA (in which all the Call for Sites sites in South Gloucestershire are situated) and b), the lack of joint working provides evidence how, contrary to paragraph 16c) of the NPPF, the authorities have failed in respect of the plans “shaped by early, proportionate and effective engagement”.

3.12. Together, the above reasons point towards wider issues pertaining to the existing infrastructure provision in Kingswood and neighbouring areas and how local needs can best be accommodated. This matter is discussed further in section 2.15-2.25 below in relation to sites in Kingswood. Furthermore, our above concerns question SDC’s compliance with Section 20 7bi) of the Planning and Compulsory Purchase Act (2004)<sup>13</sup> insofar that the omission of a Statement of Common Ground between SDC and SGDC evidences a clear oversight and negation to “fulfil duties imposed on the authority by Section 33A in relation to the document’s preparation”.

<sup>12</sup> Wider Bristol HMA Strategic Housing Market Assessment (2015) Volume One. Available at: <https://www.n-somerset.gov.uk/sites/default/files/2020-03/ed7%20wider%20bristol%20housing%20market%20area%20report%202015.pdf>

<sup>13</sup> <https://www.legislation.gov.uk/ukpga/2004/5/section/20>



## 4. Site Allocations

- 4.1. The Stroud Pre-Submission Local Plan includes two proposed site allocations within the Kingswood parish boundary – residential allocation PS38 (South of Wickwar Road) and employment allocation PS47 (Land West of Renishaw New Mills). Details on each allocation are summarised below in addition to a list of KPC’s main concerns in relation to each site allocation.

### *Residential Site Allocation PS38: South of Wickwar Road*

- 4.2. Policy PS38 is allocated for a “*development comprising 50 dwellings and open space uses and strategic landscaping*”. The allocation is regarded as a “*sustainable extension to Kingswood*” in the Pre-Submission Local Plan, with main access of Wickwar Road (B4060). In terms of its delivery, the Local Plan states that “*a masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner*”.



*Figure 4: Pre-Submission Local Plan Site Allocation PS38 (South of Wickwar Road)*

- 4.3. KPC considers that this allocation is inappropriate due to the pressure it will place on existing infrastructure services and facilities. In particular, we dispute SDC’s claim that “the County Council has indicated that there is existing capacity at local schools within Wotton”, as stated within the Regulation 18 Local Plan Consultation Report.

4.4. To evidence this, Gloucestershire County Council’s updated Local Development Guide (2021)<sup>14</sup> sets out Pupil Product Ratios to be adhered to in all new developments throughout the County. Based on site allocation PS38 (South of Wickwar Road) (50 dwellings allocated), the following number of places will need to be sought:

<b>Site Allocation PS38 (South of Wickwar Road)</b>	
<b>Educational Facility</b>	<b>Number of additional places required</b>
Pre-school	15
Primary	20.5
Secondary	10
Post-16	3.5
Special Educational Needs (SEN)	0.26

Table 1: Site allocation PS38’s (South of Wickwar Road) educational demands

4.5. Table 2 below reveals the impact of the additional places requirements on local school capacities, as based on Gloucestershire County Council’s most up-to date school places data (January 2021 census). The below table assumes that the 20.5 (rounded up to 21) additional primary school places required are evenly distributed across all schools.

<b>Estab.</b>	<b>School</b>	<b>PAN</b>	<b>Max. capacity (based on PAN)</b>	<b>R</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>Total</b>	<b>Total + site allocation PS38 requirements</b>
5204	Blue Coat C of E Primary School	45	315	46	36	38	42	48	43	50	<b>303</b>	<b>308.25</b>
5209	The British Primary School	30	180	26	19	19	31	24	30	28	<b>177</b>	<b>182.25</b>
2075	Kingswood Primary School	17	102	13	17	15	17	20	18	17	<b>117</b>	<b>122.25</b>
3367	Hillesley C of E Primary School	8	56	7	7	2	6	4	5	3	<b>34</b>	<b>39.25</b>

Table 2: Gloucestershire County Council’s school places data and PS38 educational requirements

<sup>14</sup> <https://www.gloucestershire.gov.uk/media/14820/lbg-2021-final-adopted-version.pdf>

4.6. The table above reveals that all four primary schools serving Kingswood are already over capacity (total compared to the maximum capacity, as based on PAN [published admission number] thresholds). The additional educational requirements posed by Policy PS38 would further exacerbate this issue, resulting in increased pressure on existing schools.

4.7. With the above in mind, it is entirely unacceptable that SDC has removed the prerequisite to address school capacity issues within Policy PS38. As shown below, this requirement was omitted within the Pre-Submission Local Plan Review. This is a clear dereliction of duty by SDC, as it is clear that the Pre-Submission Local Plan (and plan-making process) has not adequately considered or addressed local school capacity issues. As such, the Pre-Submission Local Plan does not accord with paragraph 94 of the NPPF which states that *“it is important that a sufficient choice of school places is available to meet the needs of existing and new communities”*.

**Draft site allocations**

**PS38 South of Wickwar Road:**

Subject to the satisfactory resolution of existing school capacity issues at Kingswood, land south of Wickwar Road, as identified on the policies map, is allocated for a development comprising 50 dwellings and associated community and open space uses and strategic landscaping. Detailed policy criteria will be developed where necessary to highlight specific mitigation measures and infrastructure requirements. A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.

Figure 5: SDC Draft Local Plan Policy PS38

**Local Sites Allocation Policy PS38**

**South of Wickwar Road, Kingswood**

Land south of Wickwar Road, as identified on the policies map, is allocated for a development comprising 50 dwellings and open space uses and strategic landscaping. Particular issues to address include conserving and enhancing local biodiversity, integrating the development into the landscape setting and highway safety improvements to access services within the village. A Masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.

Figure 6: SDC Pre-Submission Local Plan Policy PS38

4.8. Access to and from the site remains a key issue. The Traffic Forecast Report (2021, Table G.1, Appendix A-K)<sup>15</sup> states that PS38 (South of Wickwar Road) will result in the following number of additional trips generated:

Site Allocation	AM Arrivals	AM Departures	PM Arrivals	PM Departures	Total
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<sup>15</sup> <https://www.stroud.gov.uk/media/1484474/final-report-appendices-a-k.pdf>

PS38: South of Wickwar Road	5	25	16	10	56
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Table 3: Trip generator outputs for PS38 (Traffic Report Forecast, 2021)

4.9. An additional 56 trips per day along Wickwar Road would pose a serious risk of collision, as approximately 100m west along Wickwar Road the 30mph speed limit reverts to the national speed limit (60mph). Therefore, vehicles turning in or out of the site via to narrow B-road would pose a dangerous hazard to oncoming vehicles. This reliance on private vehicles conflicts with both Kingswood Neighbourhood Plan’s Objective of “ensuring that alternatives to car use are available”<sup>16</sup> and paragraph 103 of the NPPF, which requires developments “to be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine mode of transport choices”.

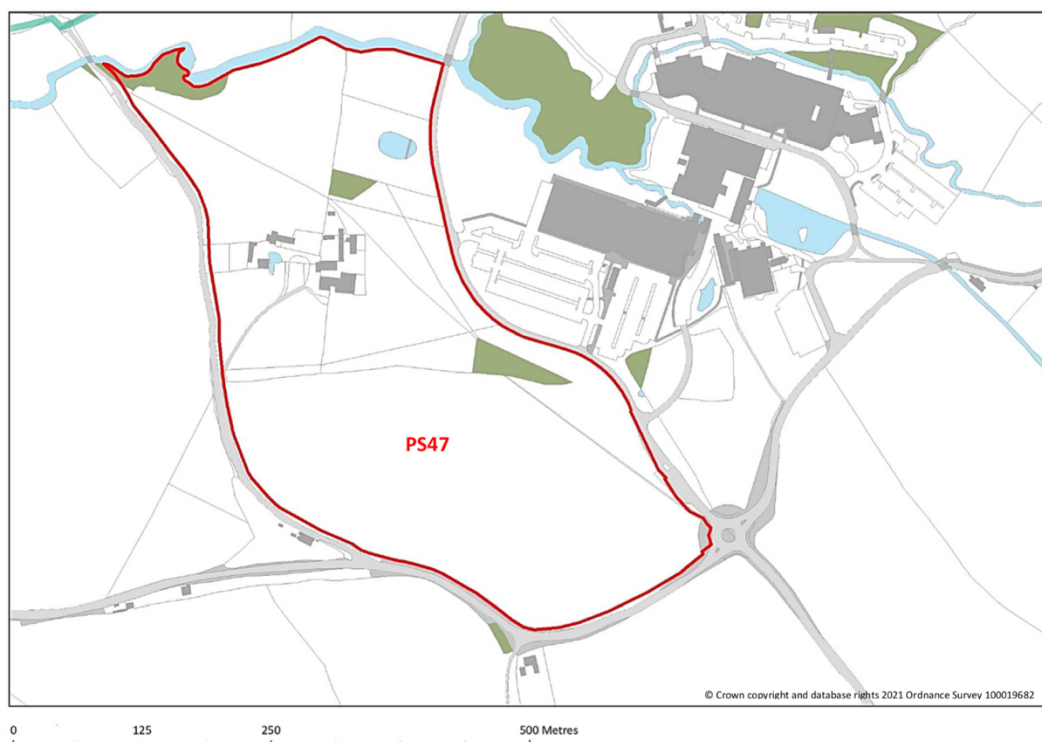
4.10. In the absence of any criteria or design guidance on how walking and cycling infrastructure should be situated on-site, Policy PS38 (South of Wickwar Road) fails to align with the Pre-Submission Local Plan’s own aspirations for The Wotton Cluster, which states that “designing safe green walking and cycle routes and achieving a better public transport system” is a top priority for the area. This lack of regard for active travel measures also conflicts with SDC’s declaration of the climate emergency in 2019 and subsequent proposed framework for moving towards a Climate Neutral District by 2030.

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<sup>16</sup> <https://www.stroud.gov.uk/media/2466/kingswood-ndp-final-v21.pdf>

*Employment Site Allocation PS47: Land West of Renishaw New Mills*

- 4.11. The 'Land West of Renishaw New Mills' is allocated as an extension to the key employment site EK17 Renishaw New Mills for office, B2 and B8 employment.



*Figure 7: Pre-Submission Local Plan Site Allocation PS47 (Land West of Renishaw New Mills)*

- 4.12. KPC is concerned that PS47 may not be viable on the grounds that Renishaw Plc is currently undergoing major change. Further clarifications on these points is provided within the Sustainability Appraisal chapter.

- 4.13. KPC also questions the adaptability of the Policy PS47 (Land West of Renishaw New Mills) as, as stated in Policy PS47, the scheme will consist of a “*high quality ‘campus’ style development*”. Recent research by the British Council for Offices (BCO, 2019)<sup>17</sup> found that, whilst business parks are spread widely across the UK, absorption rates are generally low. BCO notes that low absorption rates are more prominent in areas “*which do not have the benefit of proximity to universities, and therefore access to technology and innovation*”. There is also a level of uncertainty with such ventures due to changes in staff preferences and working practices. It is therefore considered that flexibility and adaptability should be built in to allow for market changes. Given the above, it is evident that the design of the scheme should be adaptable to allow for all eventualities.

<sup>17</sup> <https://www.exigere.co.uk/wp-content/uploads/2020/02/BCO-Research-March-2019.pdf>

- 4.14. Other concerns relating to wastewater provision are set out in the proceeding Infrastructure chapter.

## 5. Sustainability Appraisal / Strategic Environmental Assessment (SA / SEA)

- 5.1. As per paragraph 32 of the NPPF, *“Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements”*. SDC’s Local Plan was informed through a number of sustainability appraisal reports published throughout the plan preparation process. As a result of the Council’s SA / SEA we consider Stroud Local Plan policies to be unsound as we set out below.

- 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

- 5.2. KPC is concerned that methodology applied within 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), paragraph 4.66 states that (our emphasis added) *“the summary of the appraisal findings for the four initial options alongside the hybrid option and the four additional options for the growth strategy are re- presented in Appendix 8 of this SA Report. The appraisal work for these options in Appendix 8 is ‘policy-off’; i.e., it does not reflect any of the requirements for development which are detailed in the relevant policy (Policy CP2) which sets the strategy for delivering development in the plan area.”*

- 5.3. With the above 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. As such, KPC cannot support the findings of the SA on the basis that the initial options testing process does not integrate any substantive evidence and is therefore purely a subjective assessment on where development can be accommodated.

- 5.4. Further to the above, paragraph 4.68 of the Sustainability Appraisal Report for the Stroud District Local Plan Review: Pre-submission Draft (2021) states that *“the smaller settlements provide access to a more limited range of services and facilities; however, these locations are only to accommodate a smaller amount of growth over the plan*

*period. Where this development is delivered there is potential for new residents to make use of existing services thereby supporting their viability. As such, mixed effects (significant positive and minor negative) are expected for the policy in relation to SA objectives 2: health and 6: services and facilities".* This justification for allocating housing to smaller settlements falls woefully short of what is required to adequately assess a location's suitability for development. In particular, the grouping of all "small settlements" and assumptions made regarding the existing level of infrastructure required in these locations is overly simplistic. In stating that there is a "more limited range of services and facilities" and adding that "[however], these locations are only to accommodate a smaller amount of growth" is a clear disregard for the complexities of positive planning, and as such fails to comply with paragraph 11 of the NPPF, which stipulates that *"Plans and decisions should apply a presumption in favour of sustainable development"*.

### *Cumulative effects*

5.5. Chapter 6 of the Sustainability Appraisal Report for the Stroud District Local Plan Review: Pre-submission Draft (2021) focuses on assessing the cumulative effects of the Stroud District Local Plan. Chapter 6 states that the *"likely significant effects of the Pre-Submission Draft Local Plan as a whole (including the site allocations) in relation to each of the SA objectives. This enables a description of the likely cumulative effects of the plan as required by the SEA Regulations"*. KPC consider this assessment to be entirely narrow in scope as it fails to recognise and assess the effects of cross-boundary developments. As highlighted above, sites for over 7,800 homes have been put forward in SGDC's Call for Sites (2020) process within a 5km distance from Kingswood. Given the significance and magnitude of growth proposed cross-boundary, it is wholly inadequate for the SA to not address the cumulative effects of these potential proposals. As such, it is considered that the SA results provide an inaccurate and ill-thought through representation of the likely effects of growth in SDC. To address these concerns, it is of paramount importance that wider development pressures are integrated into the SA to ensure that undue harm is not caused to the local environment and communities within SDC and neighbouring authorities.

*PS38: South of Wickwar Road, Kingswood (dwellings, strategic landscaping and open space uses) SA Scores (Appendix 7 of the Sustainability Appraisal Report for the Stroud Local Plan Review: Pre-Submission Draft Plan, Working Draft, April 2021<sup>18</sup>)*

5.6. As previously set out within our Regulation 18 Draft Local Plan Representations, the SA scoring for the Pre-Submission Local Plan site allocation PS38 (South of Wickwar Road, Kingswood) remains inaccurate. Site PS38 (South of Wickwar Road) attained a 'minor positive' scoring in relation to SA Objective 6 (Services and Facilities) and was justified by the following: *"this site is at a tier 3a settlement. This site included*

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<sup>18</sup> <https://www.stroud.gov.uk/media/1485366/appendices-5-9.pdf>

*community space uses in line with the Site Allocation policy text included in the Draft Plan. Local Sites Allocation Policy PS38 in the Pre-submission Draft Plan does not include the requirement for community space uses. However, it includes reference to delivering highway safety improvements to access services within the village of Kingswood.” This justification does not in any way align with the SA Scoping Report for the Stroud District Local Plan Review (2018) own definition of SA Objective 6, which instead noted that SA Objective 6’s (to maintain and improve access to all services and facilities) sub-objectives/asures are as follows:*

*“SA 6.1 Does the Plan promote compact, mixed-use development?*

*SA 6.2 Does the Plan promote the provision of new and the protection of existing services and facilities at sustainable locations?*

*SA 6.3 Does the Plan encourage the protection of existing town centres including their vitality and viability?”*

5.7. The following section demonstrates how none of the ascribed sub-objectives is achieved through site allocation PS38 (South of Wickwar Road). In relation to SA sub-objective 6.1, Policy PS38 comprises an allocation for 50 residential units to the south of Wickwar Road, a minor road which provides the only feasible route option into the centre of Kingswood. It is therefore evident that the development proposal would not include infrastructure which would support the level of housing proposed on the site. In terms of the site’s compactness, the respective 2016 Call for Sites form<sup>19</sup> notes that the site (Land at Cloverlea Barn, subsequently renamed to the South of Wickwar Road) is 2.5ha, therefore the overall development density sits at just 20 dwellings per hectare. This falls short of MHCLG’s average density figure of new dwellings in England (2002-2011)<sup>20</sup> built on non-previously developed land (29dpa). By applying this comparative data, it is abundantly clear that the scoring for SA sub-objective 6.1 is entirely invalid.

5.8. With regard to SA Sub-Objective 6.2, the justification (as above) notes that Kingswood is regarded as a Tier 3a settlement and that highway improvements will be delivered as part of the scheme to ensure that services within Kingswood can be accessed. As highlighted earlier in our representations, this classification is incorrect and essential education infrastructure is not capable of supporting further growth within Kingswood.

5.9. Given that there is considerable existing pressures on local school places within both Kingswood and Wotton-under-Edge, in addition to the absence of any educational infrastructure to be provided under Local Sites Allocation Policy PS38 (South of Wickwar Road), there is overwhelming evidence to suggest that the scoring for SA Sub-Objective 6.2 is incorrect, as significant adverse impacts would be caused to the

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<sup>19</sup> [https://www.stroud.gov.uk/info/plan\\_strat/SALA%20Site%20Submissions\\_101\\_125\\_redacted\\_opt.pdf](https://www.stroud.gov.uk/info/plan_strat/SALA%20Site%20Submissions_101_125_redacted_opt.pdf)

<sup>20</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-land-use-change-statistics>



existing local educational services and in no way would the site allocation “protect” existing services.

5.10. Furthermore, Policy PS38 offers no solution as to how school children would travel to/from the site to school, as whilst the policy makes reference to “*off-site highway improvements will be provided to facilitate safer, accessible pedestrian and cycle access to key destinations in the village*”, there is no evidence to suggest that walking and cycling routes will link to Wotton-under-Edge. In addition, the policy wording is unclear as the 50 additional homes would not generate the highway improvements required. The clear oversight would have severe detrimental impacts on the surrounding road network and would undoubtedly promote unsustainable patterns of development and limited transport modes, resulting in the non-compliance with paragraph 103 of the NPPF. This is further evidenced by the lack of consideration for potential new residents, as long-distance walking and cycling routes to schools in Wotton-under-Edge are entirely unsuitable for young children to undertake on a daily basis.

5.11. In relation to SA Sub-Objective 6.3, the SA Objective 6 (services and facilities) justification highlights that Kingswood is a ‘Tier 3a’ settlement. In addition, Policy PS38 (South of Wickwar Road) states that pedestrian and cycle routes will provide (our emphasis added) “*access to key destinations in the village*”. As noted in the Stroud District Settlement Role and Function Study Update (2019)<sup>21</sup>, 2011 Census data for Kingswood highlights that the population stands at 1,389, compared to that of 4,889 in Wotton-under-Edge. For context, the Stroud District Settlement Role and Function Study Update (2019) describes Kingswood and Wotton-under-Edge as follows:

- **Kingswood – Tier 3** “*These medium-sized and large settlements are generally well-connected and accessible places, which benefit from their proximity to higher order settlements and / or good transport routes [...] these settlements generally lack any “strategic” role or function but they all provide a good range of local services and facilities for the community*”.
- **Wotton-under-Edge - Tier 2** “*These are relatively large settlements, some of which have a “strategic” role in terms of providing services or facilities that serve a District-wide or wider-than-local catchment [...] all Tier 2 settlements have a retail role, whether strategic or local, or both. They all offer a good or excellent level of “local” services and facilities. These settlements offer some employment, although this is not necessarily a strong part of their role and function in all cases. All of these settlements face some degree of environmental and/or physical constraints to growth.*”

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<sup>21</sup> <https://www.stroud.gov.uk/media/1032745/settlement-role-and-function-update-2018.pdf>

5.12. The Stroud District Settlement Role and Function Study Update (2019) reveals that, as of 2018, Kingswood and Wotton-under-Edge have the following relative levels of community services and facilities:

Group	Services and facilities	Kingswood	Wotton-under-Edge
Healthcare	Hospital/A&E/Minor Injuries Unit	No	No
	<b>Strategic Total Score</b>	0	0
	GP, Doctors Surgery, Health Centre (NHS)	No	Yes
	Pharmacy, dispensing chemist (NHS)	No	Yes
	Dentist (NHS)	No	Yes
	<b>Local Total Score</b>	0	3
Financial	Bank/Building Society	No	Yes
	<b>Strategic Total Score</b>	0	1
	Post Office	Yes	Yes
	<b>Local Total Score</b>	1	1
Education	Secondary School	No	Yes
	Sixth Form	No	Yes
	Further Education College	No	No
	<b>Strategic Total Score</b>	0	2
	Primary School	Yes	Yes
	Pre-school playgroup or nursery	Yes	Yes
	<b>Local Total Score</b>	2	2
Recreation and cultural facilities	Library (in a building)	No	Yes
	Cinema or theatre (permanent)	No	Yes
	Swimming pool (public access)	No	Yes
	Sports/leisure centre	No	Yes
	<b>Strategic Total Score</b>	0	4
	Place of worship	Yes	Yes
	Village hall/event space/community centre	Yes	Yes
	Pub	Yes	Yes
	Playing field/sports pitch	Yes	Yes
	Childrens play area (equipped play area)	Yes	Yes
	<b>Local Total Score</b>	5	5

<b>Transport</b>	Railway station	No	No
	Petrol filling station	No	Yes
	<b>Transport Total Score</b>	0	1
	<b>STRATEGIC PROVISION</b>	0	7
	<b>LOCAL PROVISION</b>	8	12
	<b>Current classification in the 2015 Local Plan Settlement Hierarchy</b>	Tier 3	Tier 2

Table 4: Service and facility audit (Stroud District Settlement Role and Function Study Update, 2019)

5.13. KPC acknowledges that since the publication of the Stroud District Settlement Role and Function Study Update (2019) the parish boundary has changed and the Katherine Lady Berkeley’s secondary school and sixth form now fall within Kingswood parish. Despite this change, it is considered that access to and from this school is limited to Wotton Road only, therefore it is not possible to safely cycle or walk to or from site allocation PS38 (South of Wickwar Road) to the Katherine Lady Berkeley school due to the absence of sufficient walking and cycling infrastructure within Kingswood. It is also recognised that the main access to Lady Berkeley’s secondary school is narrow and not fit for purpose as it fails to provide sufficient turning space for school buses.

5.14. As evidenced above, Kingswood currently severely lacks healthcare, education and recreation and cultural facilities in comparison to nearby Wotton-under-Edge. With this in mind, it is expected that in order for Kingswood to accommodate the 50 dwellings allocated to the Parish within the Stroud Local Plan, additional infrastructure is required to ensure that the day-to-day needs of the local community (existing and proposed growth) are met. It is important to note that Wotton-under-Edge is allocated no additional housing over the Plan period, whilst Kingswood is also currently subject to further development pressures due to the ‘Land South of Charfield Road’ outline planning application (planning reference: S.20/1083/OUT), where a further 50 dwellings are proposed.

5.15. Based on the above information it is evident that Kingswood has been allocated a disproportionately high level of growth compared to other settlements within Stroud District. Of particular concern is the relative lack of essential healthcare and educational services within Kingswood. This in turn will promote unsustainable transport patterns, as new residents will have no alternative but to use private cars to access the required facilities and services from elsewhere within the district (or indeed within South Gloucestershire). As such, this unsustainable growth pattern conflicts with paragraph 102d) of the NPPF and also highlights how the ‘minor positive’ scoring of SA Sub-Objective 6.3 is incorrect, as contrary to the Sub-Objective criteria, the level of growth proposed coupled with the lack of existing infrastructure in Kingswood would lead to considerable strains on existing services, resulting in an erosion of Kingswood’s overall vitality and viability.

*PS47: Renishaw New Mills, Kingswood (employment uses and strategic landscaping) SA Scores (Appendix 7 of the Sustainability Appraisal Report for the Stroud Local Plan Review: Pre-Submission Draft Plan, Working Draft, April 2021<sup>22</sup>)*

5.16. KPC notes that Appendix 7 of the Sustainability Appraisal Report for the Stroud Local Plan Review: Pre-Submission Draft Plan, Working Draft, (April 2021) found that Policy PS47 (Renishaw New Mills) in the Pre-Submission Draft Local Plan scored ‘major positive’ for both employment and economic growth. In establishing this score, the SA Scoping Report for the Stroud District Local Plan Review (2018)<sup>23</sup> created a number of sub-objectives in relation to economic objectives. Of particular note are the following sub-objectives:

- **SA Sub-Objective 16.1:** Does the Plan allow for an adequate supply of land and the delivery of infrastructure to meet the District’s employment needs?
- **SA Sub-Objective 16.2:** Does the Plan provide for accessible employment opportunities?
- **SA Sub-Objective 16.3:** Does the Plan support the prosperity and diversification of the District’s rural economy?

5.17. KPC disputes the above ‘major positive’ SA scores for both employment and economic growth on the grounds that the delivery of 10ha of employment land does not in itself guarantee that Policy PS47 (Renishaw New Mills) will fulfil economic objectives due to the questionable viability of the existing employment site.

5.18. As highlighted in Policy PS47, the Land west of Renishaw Mills is *“allocated as an extension to the key employment site EK17 Renishaw New Mills [...] [the site] is allocated for a mix of office, B2 and B8 uses, providing opportunities to extend and improve the employment offer at the existing Key Employment site particularly within the advanced manufacturing sector and associated uses”*.

5.19. Table 29 of the latest Stroud District Employment Land Review (March 2021)<sup>24</sup> states that developer’s aspirations for the site are for *“manufacturing facilities for another enterprise of Renishaw’s owner, which will take up 50-60 percent of the site. Remainder of site to be a small business park for similar businesses”*. Table 41 (Stroud District’s Realistic Employment Land Supply) of the Stroud District Employment Land Review (March 2021) adds that, in terms of deliverability *“plans are well established and progressing for a high value advanced manufacturing business to occupy up to 60% of the site, i.e., 5.4ha. Renishaw to lead on delivery, tendering for developer*

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<sup>22</sup> <https://www.stroud.gov.uk/media/1485366/appendices-5-9.pdf>

<sup>23</sup> [https://www.stroud.gov.uk/media/1121038/10273-sa-scoping-report\\_opt\\_redacted.pdf](https://www.stroud.gov.uk/media/1121038/10273-sa-scoping-report_opt_redacted.pdf)

<sup>24</sup> <https://www.stroud.gov.uk/media/1484302/stroud-district-employment-land-review-2021.pdf>

*partners as needed [...] no specific occupiers identified but Renishaw confident it can attract businesses once the main new occupier is established”.*

5.20. The above information is of particular concern to KPC, as it is acknowledged that as of 2<sup>nd</sup> March 2021 Renishaw Plc two major founders and investors were in the process of selling their combined 53% stake in the business<sup>25</sup>. However, as of 7<sup>th</sup> July 2021 Renishaw Plc CEO Will Lees declared that the formal sale process has concluded as it has not identified a suitable buyer. This decision therefore provides much uncertainty with regards to the future of Renishaw, particularly with respect to its proposed expansion. These concerns are further highlighted in Stroud District Employment Land Review (March 2021), which concludes that *“forecasts produced for the ENA Study suggest manufacturing will decline over the next 20 years by some 1,700-2,800 jobs. A declining sector is not in evidence here, indeed manufacturing employment has grown in recent years, by some 500 jobs. As noted, the ENA Study also chose to discount the losses, reflecting other evidence sources in the report. However even if the sector were to lose 2,000 jobs it would still be a major part of the local economy and likely to dominate requirements for land and property.”* This statement combined with the uncertainty regarding the future of Renishaw Plc provide significant evidence to suggest that there may be no demand for employment allocation PS47 (Land West of Renishaw Mills) and this could, in turn, result in the stagnation and possible decline of manufacturing businesses within Stroud District. As such, it is clear that the associated ‘major positive’ SA scores are inaccurate and are no longer justified. This matter raises serious concerns over whether the Plan is unsound due to its lack of robust and proportionate evidence, as per paragraph 35b) of the NPPF.

## Transport

For the reasons detailed below, this section deems the following Stroud Local Plan policies unsound:

- **Core Policy CP2: Strategic Growth and Development Locations**

5.21. As noted earlier within these representations, growth allocated to Kingswood has been justified within the Stroud District Settlement Role and Function Study Update (2019) as Tier 3a settlements *“are generally well-connected and accessible places, which benefit from their proximity to higher order settlements and / or good transport routes”*. This is reiterated in paragraph 3.37 of the Stroud District Settlement Role and Function Study Update (2019), which states that *“Kingswood offers very good accessibility to Wotton-under-Edge and to key services and facilities”*. This is very clearly not the case, as currently Kingswood is only served by the numbers 84 and 85 services (Yate to Wotton-under-Edge), departing Kingswood every hour. Kingswood is also served by the number 60 bus (Thornbury to Gloucestershire) which

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<sup>25</sup> <https://www.thisismoney.co.uk/money/markets/article-9317705/Founders-engineering-giant-Renishaw-sale-50-years.html>

departs every 2 hours. It is also noted that there are no public transport links to/from site allocation PS47 (Land West of Renishaw Mills). Concerningly, the accurate evidence was presented within the Infrastructure Delivery Plan (2021) (which states that *“the draft LTP highlights that there are limited transport links with Wotton-under-Edge, plus traffic and parking issues in the town”*), however, this was seemingly ignored by SDC. As a result, Kingswood has wrongfully been allocated growth which it cannot sustainably accommodate. As such, the Plan cannot be considered sound due to its blatant divergence from paragraph 72b) of the NPPF. With the above in mind, it is clear that both sites allocated within Kingswood would be reliant on unsustainable transport modes – particularly private vehicles.

## 6. Infrastructure

### *General*

- 6.1. As previously highlighted in Table 4 above, Kingswood Parish does not have an adequate level of infrastructure to support the level of growth allocated to Kingswood within the Pre-Submission Local Plan, (as evidenced in our earlier Sustainability Appraisal chapter).
- 6.2. Our earlier concerns regarding the overall sustainability of Kingswood and its lack of healthcare, education and cultural facilities are further justified through the Stroud District Settlement Role and Function Study Update’s (2019) reliance on Kingswood being in close proximity to Wotton-under-Edge (a Tier 2 settlement). This is particularly worrying as it is clear that the decision to allocate growth within Kingswood on the basis that it is a Tier 3a settlement and is close to Wotton-under-Edge conflicts with Gloucestershire County Council’s Local Insight Profile for ‘Wotton-under-Edge Electoral Division Area’ (2021). This evidence report summarises the following:
  - Wotton-under-Edge has a ‘community needs score’ of 30.2 (England average 68.4). This indicates that Wotton-under-Edge is *“experiencing poor community and civic infrastructure, relative isolation and low levels of participation in community life”*.
  - The average road distance from a GP is 1.7km (England average = 1.2km).
  - An ‘Access to Health and Assets and Hazards’ (AHAH) score for health services of 37.6 (England average = 20.1) where a higher score indicates a poorer health-related environment. AHAH is a multidimensional index which *“measures how ‘healthy’ neighbourhoods are by looking at accessibility and geographical determinants of health”*.
- 6.3. The above information raises further questions as to why Kingswood is a suitable location for 50 new dwellings. Justified through its proximity to Wotton-under-Edge, site allocation PS38 (South of Wickwar Road) is situated on the western side of the existing built-up edge of Kingswood with access to Wotton-under-Edge limited to one

B-road (Wotton Road). Critically, it is evident from the above data that Wotton-under-Edge also has an inadequate provision of healthcare. On this basis, site allocation PS38 cannot be considered sustainable on the grounds that the needs of future residents would not be met in either Kingswood or Wotton-under-Edge and therefore this would cause unnecessary unsustainable trips further afield to larger settlements which include a broader range of services and facilities.

*Policy PS47: Land West of Renishaw New Mills*

6.4. As highlighted in the Infrastructure Delivery Plan (2021)<sup>26</sup>, employment allocation PS47 (Land West of Renishaw New Mills) is regarded as an ‘infrastructure risk’ on the grounds that the “site is not in proximity to the existing network”. This is a real concern given that SDC failed to address this issue within Policy PS47 (Renishaw New Mills) in the Pre-Submission Local Plan. The Pre-Submission Local Plan merely states that “a masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner”. This statement is not deemed robust enough as it is unclear as to the extent of works required to ensure that wastewater infrastructure can sufficiently accommodate the level of growth proposed on-site. This issue is highlighted by Wessex Water in their previous Stroud Local Plan Representations (letter dated 17<sup>th</sup> March 2020)<sup>27</sup> in which Wessex Water states the following in relation to PS47 (Renishaw New Mills) (our emphasis added) “existing 525mm combined sewer to the north of the site (significant length of off-site sewer of potential watercourse crossing)”.

6.5. Despite the above requirements, it is unclear as to whether this has been incorporated into the Infrastructure Delivery Plan’s delivery strategy, as information on individual projects have not been disclosed within Chapter 15 of the Infrastructure Delivery Plan. As such, Policy PS47 (Renishaw New Mills) is in conflict with paragraph 20b) of the NPPF, as it is evident that strategic policies established by SDC do not make sufficient provision for wastewater infrastructure.

*Policy PS38: South of Wickwar Road*

6.6. As expanded on above within the Site Allocations and Sustainability Appraisal chapter, the proposed allocation of 50 dwellings on the western edge of Kingswood would cause inappropriate pressure on local educational services. This is further evidenced by Gloucestershire County Council’s Local Insight Profile for ‘Wotton-under-Edge Electoral Division Area’ (2021), which states that the average road distance from a secondary school is 2.5km (England average is 2.1km).

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<sup>26</sup> <https://www.stroud.gov.uk/media/1485685/sdc-idp-main-report-may-2021-clean.pdf>

27

6.7. Policy PS38 (South of Wickwar Road) also fails to address how walking and cycling infrastructure should be provided on-site. Given the site's current poor accessibility levels and underlying need for sustainable routes to/from the site to the centre of Kingswood and Wotton-under-Edge, it is concerning that Policy PS38 merely states that *"a masterplan to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner"*. With the above in mind, it is clear that SDC have failed to accord with paragraph 102c) of the NPPF which states that (our emphasis added) *"transport issues should be considered from the earliest stages of plan-making and development proposals so that [...] opportunities to promote walking, cycling and public transport use are identified and pursued"*.

## 7. Housing Need

For the reasons detailed below, this section deems the following Stroud Local Plan policies unsound:

- Core Policy CP2: Strategic Growth and Development Locations

### *Housing Market Areas*

7.1. KPC considers the methodology used to derive local housing need figures as inaccurate and unsound. The Stroud Local Plan (Development Strategy, Section 2.5 Housing) states that the housing need requirement from 1st April 2020 to 31<sup>st</sup> March 2040 equates to 12,600 homes, as based on the findings of the Gloucestershire Local Housing Needs Assessment (2019). The Local Housing Needs Assessment uses contextual data (such as travel to work boundaries) to define the housing market area.

7.2. The Local Housing Needs Assessment states that Travel to Work Areas (TTWA) have changed between 2001-2011. As highlighted in Figure 8, the Gloucester TTWA boundary was altered between 2001 to 2011 in order to include Kingswood and Stroud within the Gloucester TTWA. This represents a divergence from the Housing Market Area defined within the Wider Bristol Strategic Housing Market Assessment, which includes Kingswood within the Wider Bristol functional Housing Market Area (Figure 9).



ONS TTWAs based on 2001 Census data



ONS TTWAs based on 2011 Census data

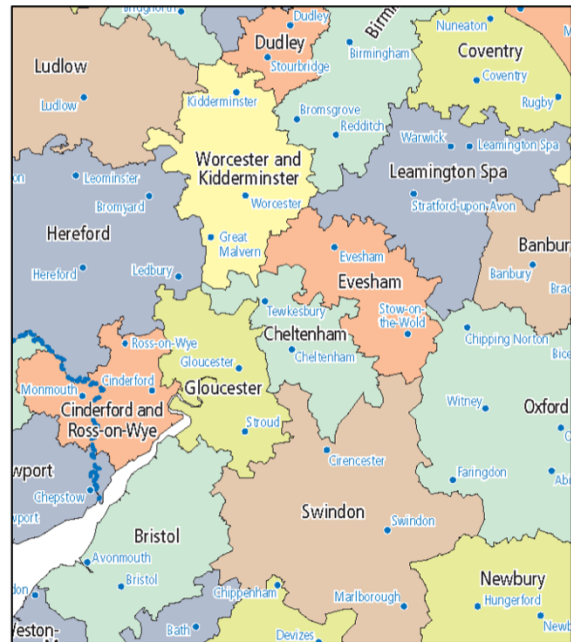


Figure 8: Gloucestershire SHMA (2019) Travel to Work Area boundary changes between 2001-2011

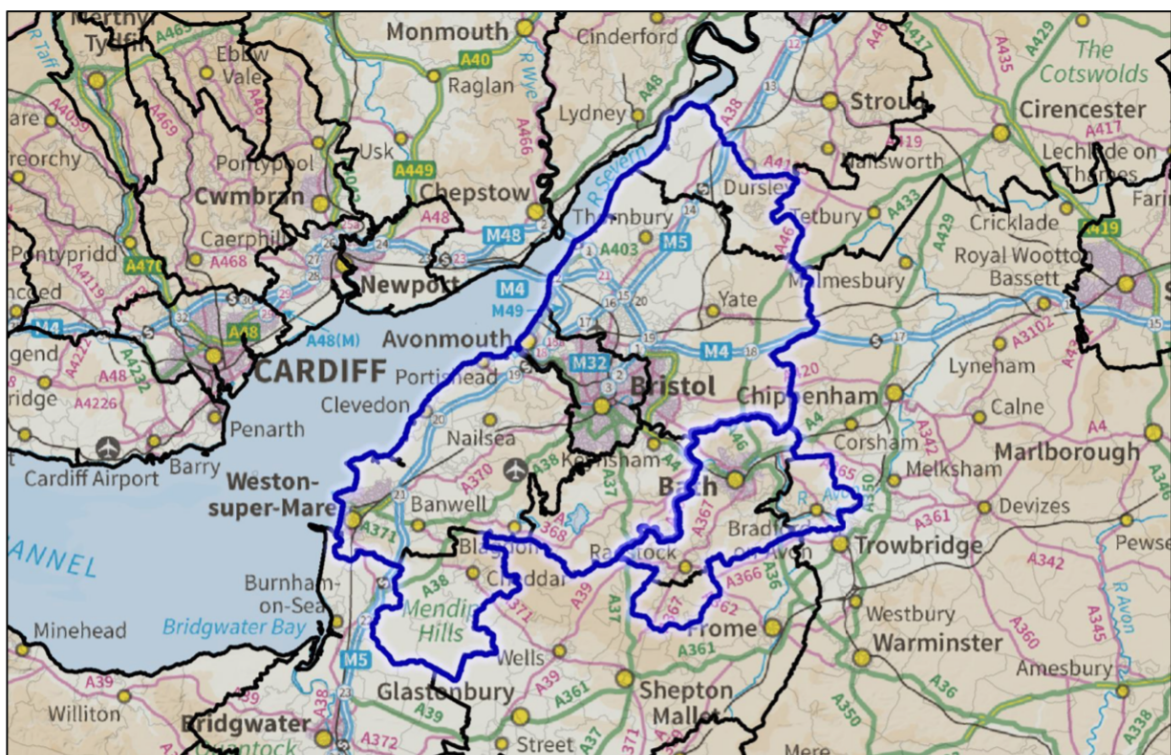


Figure 9: Wider Bristol Housing Market Area (Wider Bristol SHMA, 2015)

7.3. In recognition in this change of approach, the Gloucestershire Local Housing Needs Assessment (2019) states that “the area bounded by two Valuation Office Agency (VOA) Broad Rental Market Areas (BRMA) is very closely aligned to the County boundary of Gloucestershire. Taken together, these datasets identify Gloucestershire as an HMA. This does not prevent overlaps occurring with other HMAs. However, from

*an administrative and pragmatic point of view it is necessary for HMAs to follow local authority boundaries and the six LPAs in the Gloucestershire HMA remain the most appropriate grouping*". Given that the justification for this divergence is underpinned on purely an administrative factor and not one founded in local market signals and evidence, it is highly unclear as to whether the renewed approach to include Kingswood as part of the Gloucester HMA is accurate and robust. As a result, it is plausible that the local housing need figure set out in the Stroud Local Plan is not representative of local needs in Kingswood.

- 7.4. Further to the above point, it is acknowledged that the Gloucestershire SHMA (2019) was published prior to the Covid-19 pandemic. It goes unsaid that the Covid-19 pandemic has caused unprecedented shifts to our working and living patterns. With this in mind, it is concerning that there has been no acknowledgement of this within the Stroud Local Plan. As such, the Plan should be revisited to ensure it reflects the most recent trends and projections.

### *Existing Supply*

- 7.5. The Pre-Submission Local Plan has allocated 50 dwellings to Kingswood and no growth in Wotton-under-Edge. However, recent planning permissions data for Wotton-under-Edge highlights that 53 residential dwellings are currently within the development pipeline (but are yet to be completed). As shown in Table 5 below, the number of additional homes recently permitted in Wotton-under-Edge fulfils (and indeed exceeds) the local housing figure afforded to Kingswood in the Pre-Submission Local Plan. In addition, SDC's most recently published Housing Land Supply Assessment Update (November 2020)<sup>28</sup> identifies a 6.56 years supply when assessed using the Government's standard methodology for calculating local housing need. This exceeds the minimum need to establish 5 years of supply. As such, it is clear that PS38 (South of Wickwar Road) is unnecessary as consistent supply within Wotton-under-Edge has eradicated the need for further housing in Kingswood over the duration of the Plan.

<b>Development</b>	<b>Number of Houses</b>	<b>Date of Permission</b>	<b>Status</b>
Fountain Crescent	22	22 Dec 17	Completed
Symn Lane	12	1 Aug 19	In progress. Completion expected June 2022
Gloucester Street	8	4 Sep 19	Not Started
Berkeley Close	3	27 Nov 19	Not Started
Dryleaze Court	22	23 Apr 20	Nearing completion – some homes occupied

<sup>28</sup> <https://www.stroud.gov.uk/media/1411155/5yrs-november-2020-update-report.pdf>

Mount Pleasant	5	17 Jun 20	Nearing completion
Pitman Place	3	Awaited	Not Started
<b>Total</b>	<b>75</b>		14 Not Started

Table 5: Recent planning permissions in Wotton-under-Edge

## 8. Transport

### General

8.1. As highlighted within the ‘Sustainability Appraisal’ chapter, Kingswood has poor levels of existing public transport. As such, there is limited connectivity from Kingswood to neighbouring villages such as Wotton-under-Edge. This is evidenced by site allocation PS47 (Land West of Renishaw Mills) which currently has no public transport links to/from the site. Opportunities for cycling infrastructure improvements are limited by the narrow rural nature of the existing road network. Any new developments within the village which require access to services in neighbouring Wotton-under-Edge would create a throughflow of traffic within the village centre. KPC considers this to cause a disproportionate level of harm to Kingswood.

### Policy PS38: South of Wickwar Road

8.2. Existing vehicle movement data is presented in Figure 10. As highlighted in Table 3 above, site allocation PS38 (South of Wickwar Road) would result in an additional 56 vehicle trips per day. Over the course of a month (assuming a 30-day month), this would result in an overall increase of 1,680 vehicle trips per month. Given that the primary (and only) road access to this site is via Wickwar Road, it is therefore assumed that additional trips would at a minimum all be concentrated on Wickwar Road. This would result in an average increase in vehicle trips of 2.68% per month. The relative percentage increase resulting from the development of PS38 (South of Wickwar Road) on historical trip data is presented in Table 6. It is also worth noting that this data was measured during the Covid-19 pandemic and therefore future data is likely to reflect pre-pandemic conditions.

8.3.

	Jan. 2019	Sept. 2019	Jan. 2020	Sept. 2020	Jan. 2021	Jun. 2021
Wickwar Road vehicle movements	82060.00	94891.00	78180.00	85441.00	42922.00	40499.00
PS38: South of Wickwar Road - percentage increase resulting from additional monthly vehicle trips	2.05%	1.8%	2.15%	2.00%	3.91%	4.15%

Table 6: Historical vehicle movements along Wickwar Road and the associated impact of allocation PS38 on the local road network

8.4. An increase of (on average 2.68%) for vehicle trips along Wickwar Road is simply not sustainable. As iterated previously, Wickwar Road is a narrow B-road incorporating 60mph and 30mph zones. The proposed increased use of this road would cause significant tailbacks throughout Kingswood during peak times such as school pick-ups where school buses are required to travel through Kingswood. This situation is likely to worsen as a result of the insufficient capacity of local schools and resultant need for proposed new residents to travel further afield to access schools in nearby Wotton-under-Edge. As such, it is considered that PS38 (South of Wickwar Road) does not accord with paragraph 102a) of the NPPF on the grounds that the potential impacts of development on the road network was not adequately addressed through the plan-making process.

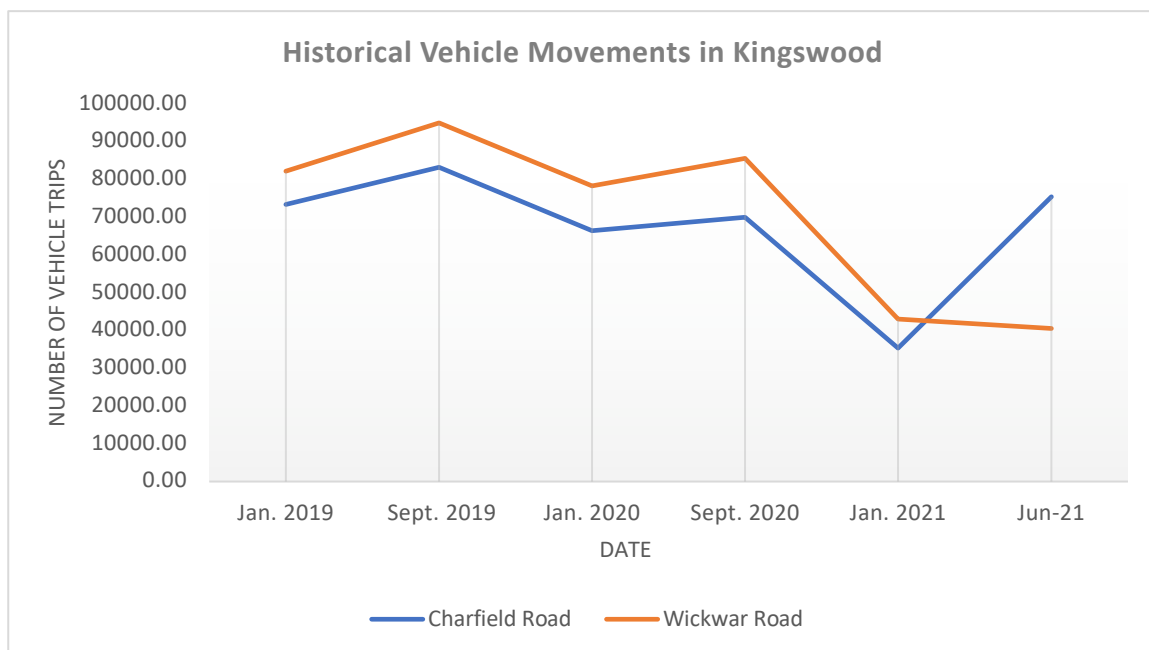


Figure 10: Historical vehicle movement data in Kingswood Parish

## 9. Conclusions and Recommendation

- 9.1. It is clearly evident that SDC has failed to discharge its legal duty to cooperate with neighbouring authorities. This is of particular concern due to the vast levels of potential growth proposed on the SDC/South Gloucestershire boundary. This is a clear dereliction of duty by SDC, evidencing the Plan's non-compliance with paragraph 35a) of the NPPF. As such, KPC considers the Plan unsound on the basis that it has not been positively prepared, is not justified, is not effective, is not consistent with national policy and is not legally compliant.
- 9.2. KPC is concerned that policies relating to the overall development strategy and site allocations are underpinned on inaccurate evidence. In particular, it is clear that the Stroud District Settlement Role and Function Study Update (2019) has wrongfully classified Kingswood as a Tier 3a settlement. This classification is not reflective of Kingswood's role within the district, and, as such, has led to disproportionately high levels of growth allocated to the Parish within the Pre-Submission Local Plan. As such, the Stroud Local Plan is unsound on the grounds that it has been poorly prepared and has failed to provide an accurate strategy which meets the area's objectively assessed needs, as per paragraph 36 of the NPPF.
- 9.3. In addition, questions remain unanswered as to why site allocations PS38 (South of Wickwar Road) and PS47 (Renishaw New Mills) are considered deliverable given their respective issues relating to pressures on the road network and existing infrastructure, poor accessibility and overall viability. To this end, it is evident that the Local Plan is unsound on the basis that it is inconsistent with national policy, as, contrary to paragraph 8 of the NPPF, the Plan does not adequately "identify and coordinate the provision of infrastructure".
- 9.4. KPC also considers that the SA is not legally compliant as it fails to adhere to Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations (2004). Specifically, the plan-making body (SDC) did not adequately consult the consultation bodies and other parties, who, in its opinion, are affected or likely to be affected by, or have an interest in, the decisions involved in the assessment and adoption or making of the plan" (as per paragraph 020, reference ID 11-020-20140306 of the NPPG)<sup>29</sup>. Due to the lack of a supporting Statement of Common Ground with SGDC and all other neighbouring authorities, SDC has failed to adequately assess the sustainability of its Local Plan and indeed consult neighbouring authorities where cross-boundary considerations should be taken into account. Furthermore, there are no up to date, published and agreed SOCGs with any neighbouring local authorities to support the Pre-Submission Local Plan and therefore it is clear the SDC has failed to discharge its Duty to Cooperate.

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<sup>29</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>