



Stroud District Council Local Plan Review 2040

Regulation 19 Consultation

July 2021



gladman.co.uk



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1 INTRODUCTION

1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Stroud District Council Local Plan Review Regulation 19 consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 The Council will need to carefully consider its policy choice and ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2019). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system, as set out in the Ministry for Housing, Communities and Local Government (MHCLG) consultations on "Changes to the Current Planning System, August 2020", "Planning for the Future, August 2020" and "National Planning Policy Framework and National Model Design Code: consultation proposals".

1.1.4 Gladman Developments has a land interest in Kingswood on land to the south of Charfield Road which is being promoted through the emerging Local Plan Review. This site is available, suitable and deliverable for up to 50 dwellings as summarised in Section 5.1 of this representation. Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Selby must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 The revised Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The revised Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of

¹ PPG Reference ID: 61-001-20180913

planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 Stroud District Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Stroud Local Plan Review's decision-making and scoring should be robust, justified and transparent.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019 and July 2021. These publications are revisions to the initial 2012 Framework and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and Planning for the Future consultation.

3.1.2 The revised Framework (2019) introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, national policy reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, Paragraph 16 of the Framework (2021) states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

- 3.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 3.1.4 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. While Annex 2 of the Framework (2021) provides definitions for the terms "deliverable" and "developable".
- 3.1.6 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2019).
- 3.1.7 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).

3.1.8 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

3.2 Planning Practice Guidance

3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

3.2.2 The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government's ambition to achieve 300,000 new homes annually.

3.2.3 Revisions to the PPG on the 20th February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method².

3.2.4 It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. Whilst we support the Council in its positive approach to plan for above the minimum requirement, an even greater housing figure would enable Stroud to capture a larger proportion of the £7 billion yearly housebuilder contributions³. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25⁴, it

² PPG Paragraph: 005 Reference ID: 2a-005-20190220

³ MHCLG (2020). 'Planning for the Future'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

⁴ Shelter & Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: https://england.shelter.org.uk/media/press_releases/articles/over_80.000_new_homes_will_be_lost_in_one_year_to_covid_chaos

is also imperative that Stroud District Council Local Plan Review identifies sufficient land to support the delivery of homes

- 3.2.5 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation's recommendation that local plan should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

3.3 National Planning Policy Consultations

- 3.3.1 On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 3.3.2 Timescales remain uncertain, however subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes. In February 2021 a consultation on draft revisions to the NPPF and a new draft National Model Design Code were published with changes focussed on the impact and contribution of design, tree-lined streets and the use of Article 4 directions⁵. It will be important that the Council keeps abreast with the implementation of these changes to determine any potential implications for the Local Plan.
- 3.3.3 A further consultation on immediate changes to the current planning system closed on 01 October 2020⁶. Of significant note is a proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.
- 3.3.4 In December 2020 the Government published their response to the 'Changes to the Current Planning System'. This document provides an overview of the consultation

⁵ National Planning Policy Framework and National Model Design Code: consultation proposals: <https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals>

⁶ Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

responses before highlighting that it has been deemed that the most appropriate approach is to retain the Standard Method in the current form with an additional 35% uplift to the 'post-cap number' for 20 local authorities. The Government's rationale behind this approach is to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method.

3.3.5 The latest correspondence from Government regarding the revisions to the Standard Method for calculating local housing need will not affect the minimum local housing need which Stroud District Council should Plan for.

3.3.6 In her speech at the State Opening of Parliament in May 2021, the Queen announced that the Government will introduce "laws to modernise the planning system, so that more homes can be built, will be brought forward...". Notes accompanying the speech confirm that a future Planning Bill will seek to create a simpler, faster, and more modern planning system that ensures homes and infrastructure can be delivered more quickly across England. Timings on the publication of the draft Planning Bill remain uncertain, however, subject to the outcomes of this process, the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.

4 STROUD LOCAL PLAN REVIEW PRE-SUBMISSION DRAFT LOCAL PLAN

4.1 Background

4.1.1 The Stroud District Local Plan was adopted on 19th November 2015 and aimed to provide a positive planning policy framework for the District for the period up to 2031. National policy, contained within the National Planning Policy Framework (NPPF), requires local plans to be kept up to date. There is now a requirement to plan for current and future development needs over at least a 15 year time horizon.

4.1.2 Therefore, as per the national requirement the adopted plan is now time expired and as such the policies, including the housing requirement adopted in this Plan, are no longer suitable to respond to the District's needs. It is therefore vital that the Local Plan Review positively responds to the updated evidence to keep the Local Development Plan up to date.

4.1.3 As stated in previous representations, Gladman are supportive of the Council working with the other Gloucestershire authorities to determine the housing needs across the area for the next 20 years. This joined up approach aligns with national policy and guidance and seeks to ensure that housing needs across the entire county are met over the plan period.

4.1.4 The next following chapters of this representation will respond to the proposals outlined in the Regulation 19 Pre-Submission Draft version of the Stroud Local Plan Review.

4.2 Housing Distribution – Core Policy CP3

4.2.1 The proposed development strategy set out in the Pre-Submission Draft Local Plan outlines a hybrid approach incorporating a variety of different options for future growth in the District.

4.2.2 The strategy will concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure, and will support the regeneration of the canal corridor through the Stroud valleys and at Berkeley/Sharpness. Housing and employment growth will also

be centred at two new settlements at Sharpness and at Wisloe within the Severn Vale (Rail /A38/M5 corridor), where there is the potential to create new sustainable communities along garden village principles. In order to meet wider development needs and to support and improve existing services and facilities at smaller towns and larger villages, modest levels of growth will be delivered.

4.2.3 Gladman are supportive of a strategy which adopts a hybrid approach to growth, in so much as it directs growth to a range of tiers of settlements and also to the creation of new settlements. Whilst Gladman recognise that the main towns offer the most sustainable locations and consequently it follows that they should be delivering a significant proportion of growth, this does not mean that the plan should place an over reliance on these locations at the expense of other settlements within the district.

4.2.4 Gladman are supportive of the LPR including a number of new settlements as part of their overall growth strategy. These types of locations can have an important role to play in the delivery of much needed housing across the plan period. Notwithstanding this, it is of fundamental importance that the plan adopts a realistic approach in terms of the lead in times and delivery rates for these types of developments. With this in mind, Gladman make reference to the recent Inspectors letter in relation to the Uttlesford Local Plan, in summary this recommends withdrawal of the Local Plan on the basis that there is a lack of evidence to robustly justify the deliverability of the three Garden Communities which make up a significant proportion of the growth strategy. It is important that the Council consider in detail the infrastructure requirements, overall viability and delivery timeframes for these new settlements to ensure they are capable of demonstrating their deliverability and soundness for inclusion within the LPR.

4.2.5 Gladman consider that smaller settlements, particularly some of the local service centres and Tier 3a villages, have sufficient capacity to accommodate significantly more than the 985 dwelling requirement indicated at Table 3 - Policy CP2 in total. In order to achieve sustainable patterns of development across the District it is vital that some of these settlements are allocated additional growth. For example, Kingswood is a net importer of employees from other areas. Additional growth here would assist in reducing the need to travel and support broad sustainability objectives.

4.2.6 In relation to the distribution of growth, in allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary, a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

4.3 Housing Requirement – Core Policy CP2

4.3.1 The Pre-Submission Draft outlines that the Local Plan's development strategy will distribute at least 12,600 additional dwellings over the 20-year plan period which equates to 630 homes per year. This housing requirement is based on the recent Gloucestershire Local Housing Needs Assessment (LHNA) and represents a 40% increase on the annualised requirement as set out in the current Local Plan which is 456pa.

4.3.2 The Government's standard methodology as revised in December 2020 states the need for Stroud to deliver a minimum of 635 dwellings per year, for the 20-year Local Plan Review plan period this would equate to a total housing requirement of 12,700 dwellings. The housing requirement in the Local Plan Review is therefore short of sum 100 dwellings over the total plan period based on the standard method figure.

4.3.3 Gladman acknowledge that Stroud District Council accept that their housing requirement is a minimum figure and are seeking to allocate sites for development which will deliver in excess the figure outlined in Core Policy CP2.

4.3.4 As stated above, Gladman concur that the smaller settlements, in particular some of the local service centres and Tier 3a villages have capacity to accommodate significantly more than the 985 dwelling requirement indicated at Table 3 in Policy CP2 in total. Some of these settlements require additional growth to achieve sustainable patterns of development.

4.3.5 Gladman submit that it is critical that the LPR provides sufficient contingency and flexibility for occasions when housing allocations do not come forwards as planned. From our experience with regards to other Local Plans, Gladman recommend that the LPR should include a 10-20% flexibility factor. This would help ensure the plan is effective and the necessary scale of housing is delivered over the plan period.

4.4 The Wotton Cluster

4.4.1 Gladman are promoting a site within Kingswood, which falls within the Wotton Cluster. Further details regarding this site are provided later within this representation.

4.5 Core Policy – CP9 Affordable Housing

4.5.1 Policy CP9 outlines that in the listed areas sites capable of providing 4 or more dwellings will be required to provide 30% affordable housing .In all other areas, sites capable of providing 10 or more dwellings, or covering a site area of 0.5 hectares or more will be required to provide 30% affordable housing

4.5.2 Gladman note that this update to Policy CP9 reflects the changes to affordable housing thresholds as set out in paragraph 63 of the NPPF (2019).

4.5.3 The policy goes on to state that the Council will negotiate tenure, size and type of affordable housing on a site by site basis having regard to housing needs, site specifics and other factors. Gladman support the flexibility provided within this policy in terms of the tenure, size and type. This is important to ensure that the affordable housing delivered both aligns with local needs and is appropriate for the site.

4.6 Delivery Policy – DHCP1 Meeting Housing Need Within Defined Settlements

4.6.1 Policy DHCP1 sets out the Councils approach to settlement boundaries and outlines that:

“at all settlements with defined settlement development limits, permission will be granted for residential development or redevelopment within those defined settlement development

limits, subject to the satisfaction of detailed criteria defined for meeting housing need at settlements.”

4.6.2 Gladman object to this approach as there may be sites adjacent to but outside of the defined settlement limits which are sustainable, would not result in material harm and would assist the Council in meeting their housing need.

4.6.3 The policy should be amended to be flexible enough to accommodate new development outside of existing settlement development limits, to allow the Council to quickly address any issues in shortfall in housing supply against the plan requirement. Gladman recommend that the Council could incorporate a criteria based policy to achieve this, such an approach would allow the plan to protect itself against unsustainable development at the same times as being open and flexible to additional development opportunities to come forwards to meet identified needs. Gladman refer to policy GD2 of the Harborough Local Plan as an example, which states:

“in addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of Market Harborough, Key Centres, the Leicestershire Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where...”

4.6.4 A series of criteria then follows.

4.6.5 Gladman recommend that the Council consider updating Policy DHCP1 to reflect these comments.

4.7 Delivery Policy – DHC2 Sustainable Rural Communities

4.7.1 Policy DHC2 is a new policy proposed through the LPR which it states is seeking to provide greater flexibility for the rural communities in order to counter demographic trends in the rural settlements.

4.7.2 The proposed policy outlines that housing schemes of up to 9 dwellings will be supported outside SDLs at designated Tier 4 settlements providing certain criteria are met. The policy goes on to set out that for schemes of 4 or more dwellings, where

30% affordable housing is required, the affordable housing will be made available for those in need with a strong local connection.

- 4.7.3 Gladman are supportive of the flexibility provided through this policy to enable some development to come forward outside SDLs of Tier 4 settlements, however believe that this should not be restricted to schemes of up to 9 dwellings, rather it should allow for schemes of an appropriate size (in relation to the settlement) to come forward.

4.8 Delivery Policy HC4 - Local housing need (exception sites)

- 4.8.1 Policy HC4 outlines the Councils approach to exception sites which respond to local housing need through the delivery of affordable housing, including entry level homes, and single plot self-build or custom build affordable dwellings on sites well related to existing settlements.

- 4.8.2 Gladman are supportive of Policy HC4 in its approach to delivering affordable housing on exception sites in Tier 3 or above in terms of the Plan settlement hierarchy providing numerous criteria are met. Gladman are also supportive that the Council have stated that with robust evidence that some market housing can be included on affordable housing sites proposed under this policy where this is required to make the scheme viable.

4.9 Delivery Policy DHC3 - Live-work development

- 4.9.1 Policy DHC3 responds to National policy which encourages flexible working practices, such as the integration of residential and commercial uses within the same unit. As such Policy DHC3 supports live-work development subject to complying with numerous criteria.

- 4.9.2 Gladman are supportive of the positive approach to live-work development as outlined at Policy DHC3.

4.10 Delivery Policy – DHC4 Community Led Housing

4.10.1 Gladman note that Policy DHC4 is a new policy that does not feature in the existing Local Plan. Gladman object to the introduction of this policy and recommend it should be removed from the LPR in its entirety.

4.10.2 The proposed policy states:

“The Council supports the development of housing schemes that are initiated by local communities... While there are a number of types of community group or organisation that may be appropriate to promote development proposals, the Council will expect that the proposal has been initiated by a legitimate local community group ...”

4.10.3 Gladman are unclear why a proposal for a scheme on the same piece of land but being promoted by a developer rather than a community should be afforded this support by the Council. If it is a sustainable site, appropriate for development then, then it is so irrelevant of who is bringing the site forwards. Gladman strongly recommend the removal of this policy.

4.11 Core Policy – CP14 High Quality Sustainable Development

4.11.1 Gladman note that Policy CP14 is proposed to be updated through the LPR to reflect changes in national policy with regards to biodiversity net gain. Specifically, part 9 of the policy refers to biodiversity net gain. Whilst Gladman accept this reference it is important that the long term impacts are considered when reviewing proposals for biodiversity net gain taking into account that many of the measures provided as part of the development will need to mature beyond the build period.

4.11.2 Gladman also take the opportunity to note that if off-site mitigation provides the best opportunity for biodiversity gain, then the policy should be flexible enough to allow for this and it should not be ruled out from the planning application process.

4.12 Core Policy – CP15 A Quality Living and Working Countryside

4.12.1 Policy CP15 provides a series of exceptions for where development will be considered outside of SDLs in the open countryside. These include amongst others, rural

exceptions sites, replacement dwellings and schemes of up to 9 dwellings at tier 4a or 4b settlements with support from the local community.

- 4.12.2 Gladman consider the approach to development in the open countryside to be too restrictive. In this regard Gladman refer to comments made in response to Policy DHCP1 and suggest that again a criteria based policy providing additional flexibility would be appropriate here.

5 SITE SUBMISSION PROFILES

5.1 Charfield Road, Kingswood

- 5.1.1 As the Council are aware Gladman are promoting land at Charfield Road, Kingswood for residential development and associated community infrastructure. The location plan for this site is shown in Figure 1 below.

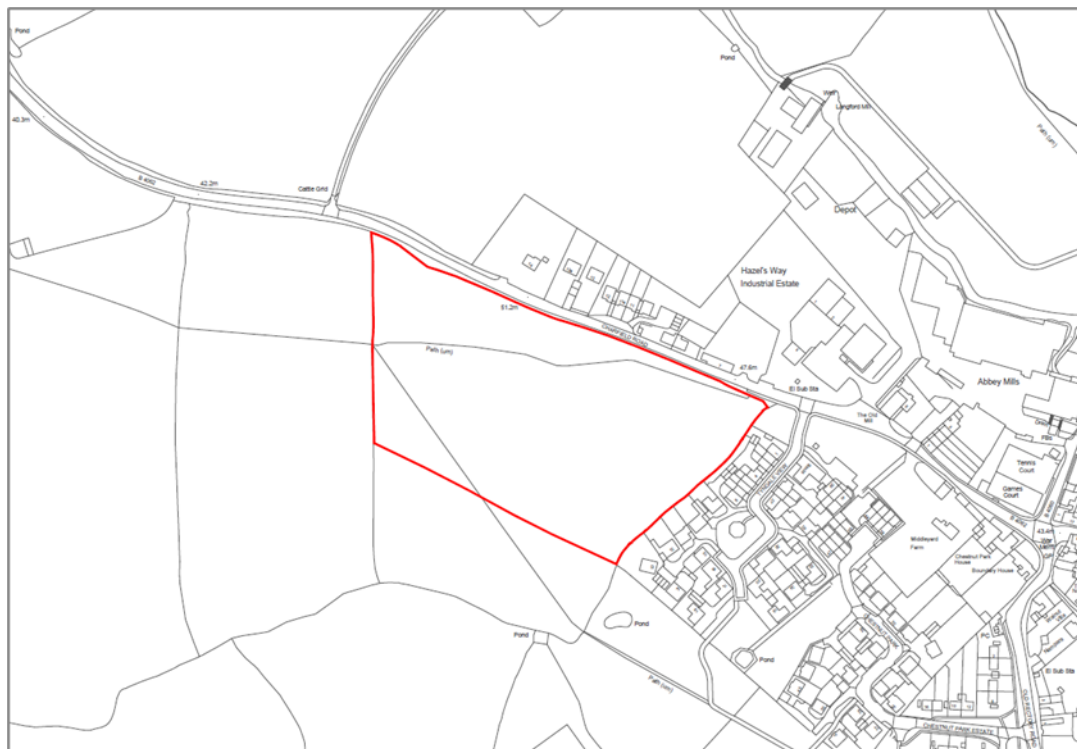


Figure 1: Location Plan, Charfield Road, Kingswood

- 5.1.2 Gladman believes that this site offers a real opportunity to the residents of the local community and the wider area to assist in meeting identified housing needs and deliver significant improvements to the public realm, including the provision of public open space.

- 5.1.3 The site is free from significant constraints, and is not subject to, nor especially sensitive in terms of built or natural protection designations. The proposed housing development will not result in significant harm in terms of acknowledged amenity, community, heritage, landscape, traffic, environmental, technical or other acknowledged public interest.
- 5.1.4 The site extends approximately 3.32 hectares and can be accessed directly off Charfield Road, which forms the site's northern boundary. The site is contained to the east by existing residential development. The western and southern field boundaries are bordered by interspersed hedgerows.
- 5.1.5 Taking account of the recent patterns of growth to this settlement, this site forms a logical extension to Kingswood. The site would provide a wider range of community benefits for both existing and new residents.
- 5.1.6 Gladman submits that the site is available and suitable for residential development and request that the Council consider allocating the site for residential development through the LPR to assist Stroud in meeting its local housing need. Gladman would welcome the opportunity to discuss our proposals for this site with the Council in more detail.

6 CONCLUSIONS

6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the Pre-Submission Draft Local Plan that are currently being explored by Stroud District Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2019) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman have provided comments on a number of the proposed policies within the LPR and believe that these need considering and addressing in order for the plan to be found sound at examination.
- 6.1.3 We hope you have found these representations informative and useful towards the preparation of the Stroud District Local Plan Review and Gladman welcome any future

engagement with the Council to discuss the considerations within forwarded documents.

