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

Dear Sir/Madam

STROUD DISTRICT LOCAL PLAN REVIEW DRAFT PLAN ADDITIONAL HOUSING OPTIONS PUBLIC CONSULTATION – REPRESENTATION ON BEHALF OF BLOOR HOMES

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

This letter first responds to the consultation, before setting out why as part of its recommendation that sufficient growth should be allocated to the villages, Land South of Walk Mill Lane, Kingswood (the subject site or The Site) be allocated for 95 new homes. And that this site should be considered for future housing development in addition to the land currently proposed to be allocated, land South of Wickwar Road, Kingswood. With this representation I have attached a note (prepared by EFM) assessing the capacity of schools in the area, particularly Wotton-under-Edge (given existing capacity issues at the local school in Kingswood) to accommodate both these sites.

Spatial Strategy

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

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

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

- Option F: Other

Question 1 – Which strategy option(s) would you support, if additional housing land is required?

It is considered that a combination of options represents the most sustainable way of delivering the required growth in the District. Such an approach is required by the NPPF which in Paragraph 68 sets out that when identifying land for homes the local planning authority should promote the development of a good mix of sites. Paragraph 68 also states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.

Notwithstanding this point Bloor Homes would as an alternative strongly advocate options B or D as Kingswood is identified in the Draft Plan as a Tier 3 Settlement – defined as generally well-connected and accessible places, which provides a good range of local services and facilities for their communities. In Kingswood’s case it is also close to Wotton-under-Edge which is highly constrained by the AONB (also constrained by the topography of the area) and the Site therefore offers the opportunity to achieve some of the growth that might have otherwise been provided in this Tier 2 settlement. As stated in the draft plan, Tier 2 Settlements have the potential to:

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

Kingswood contains a number of services and facilities and is therefore able to accommodate additional growth over that already planned. Whilst it has been advised that Kingswood Primary School is constrained the attached note from EFM identifies that there is capacity at local schools in the area.

A material consideration therefore in the assessment of both the draft allocation PS38 and the subject site is the distance primary school aged children will have to travel to attend school. The draft allocation, south of Wickwar Road, is outside of the 2 miles considered to be the acceptable walking distance for children under 8 by the New Home to School Travel Guidance, published by the Department for Transport in 2014. Whereas the subject site is located within the 2-mile limit. This means that the draft allocation is located in an unsustainable location when considered against the subject site.

Indeed, the development proposals also identify a number of opportunities to improve the pedestrian and cycle infrastructure on routes between the subject site and Kingswood School which will increase their accessibility and the safety of the users.

Furthermore, the proposed scheme includes a dedicated sports pitch for the use of and controlled by Kingswood Primary School, as this has been identified by the school as a facility that would be of great benefit to the village. Indeed, the proposal could also accommodate a nature corridor to the south of the site, which would provide an additional facility accessible to school children.

There are significant employment opportunities nearby. As well as two key employment sites within the village, the nearby Renishaw acts as an employment hub. The employment offering of Renishaw is set to substantially increase following the draft allocation – PS47 for its expansion. The current allocation of housing in close proximity to Renishaw is not considered to be acceptable. The business already draws a significant percentage of its workforce in from further afield.

Finally the provision of additional housing at Kingswood is able to support the needs of Wotton-under-Edge whose growth is highly constrained by the AONB.

In summary it is recommended that the strategy option for the emerging Local Plan should allow for a higher number of dwellings to be allocated at Kingswood.

Question 2 – If you answered yes to Q1e above, please explain which of the spatial options you would like to see combined in a hybrid strategy, and why?

Not Applicable.

Question 3 – Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?

Yes.

Question 4 – Which strategy option(s) would you support, if a reserve site (or sites) is required?

Option E, for the reasons set out in question 1 above.

Question 5 – If you answered yes to Q4e above, please explain which of the spatial options you would like to see combined in a hybrid strategy, and why?

Not Applicable.

Question 6 – What should trigger a reserve site (or sites) coming forward?

A delay in an allocated Local Plan site receiving planning permission? Yes

Failure to deliver housing at the build rates set out in the Local Plan? Yes

To further explain the answers given above I wish to focus on why Kingswood can accommodate an additional level of growth.

Land South of Walk Mill Lane, Kingswood

Therefore in order to demonstrate the appropriateness for Kingswood to accommodate additional development and so as to support the spatial options recommended above, an assessment has been carried out of the site referred to as Land South of Walk Mill Lane, Kingswood.

The assessment made below has been carried out in response to the council's assessment of the site (KIN010) in its Sustainability Appraisal. In the first instance this sub-section summarises a number of reports or notes that accompanied the previous representation made to the Draft Local Plan (January 2020).

In the first instance it is worth noting that the site's assessment was based on the impact of a 100-dwelling development at the site - this has since been reduced to 95 dwellings to incorporate community facilities and landscape improvements into the proposals, which should therefore result in an improved score for the site.

Our response to the key 'topic' areas of the Sustainability Appraisal as considered by the District Council to have an adverse impact on the potential for residential development on the site is provided below.

Heritage

The site was assessed in the council's SALA Heritage Impact Appraisal 2018 Update, where the site scored 2B. The assessment was based on an initial view on the level of sensitivity (1 – 4 where 1 is minimal and 4 is highly sensitive); potential for positive heritage benefits of the development; and potential impacts / development constraints (where 'A' is heritage interest would only influence the scale massing and design of new development and 'F' is could prohibit development). The assessment concluded that the is:

“Scope for some residential development, subject to scale, design and massing to reflect the nature of this site's conspicuous rural edge location. The impact on the setting and significance of the conservation area is likely to be minimal, subject to the scale and design of any new development.”

The accompanying Heritage Response to the council's SALA Health Impact Assessment, prepared by Orion, concludes that:

“The concept plan layout for the residential allocation provides a generous landscape buffer between the new development and the watercourse located to the south. This has the advantage of limiting the development to the northern part of the subject site, where it adjoins the edge of the existing settlement. The existing vegetation to the south-west boundary also assists in screening potential new development, particularly in longer views from the south looking north and north-west across the subject site. This screening should be reinforced, and

future development should be low in scale and utilise a materials palette that resonates with the landscape and the adjoining Conservation Area. These mitigative measures would lessen the visual prominence of any new development and adequately protect the settings of the heritage assets in the immediate vicinity."

The accompanying heritage response therefore demonstrates that residential development can be achieved on the site without adversely affecting Kingswood's heritage assets.

Landscape

The SALA states that the net developable area for the site would be 1.9ha, including an area of employment land, with a recommended development yield potential of 50 dwellings. This representation makes the case that a net developable area of 3.1 hectares, with a yield of 95 dwellings, would be entirely appropriate at the subject site.

Given the edge of settlement location the housing density will be fairly low, especially along the south-eastern countryside edge. In this location, detached and to a lesser degree semi-detached typology will be appropriate and will be served via private drives to reduce potential highways impacts on the development edge. The density can be slightly higher to the north and west where the built form will reflect the continuity of building frontage which exists along Walk Mill Lane.

The proposed density, when considered alongside the landscaping and community facilities proposed, should not therefore be considered inappropriate or to represent overdevelopment of the site.

Given the above, the proposal makes the most efficient use of land, in line with paragraph 122 of the National Planning Policy Framework (NPPF) whilst also accounting for:

"a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places."

The Landscape and Visual Assessment note previously submitted, identifies many potential benefits based on the proposed masterplan:

- The retention and enhancement of existing hedgerows;
- The planting of additional trees along the south-eastern boundary to reflect historic mapping;
- The retention of a nuclear settlement pattern for Kingswood;
- The removal of commercial depot buildings and associated HGV traffic movements within the site along Walk Mill Lane;
- The removal of commercial noise leading to a more tranquil landscape character;
- Set back of development from the stream and riparian corridor;
- Provision of open space within a location currently not publicly accessible, and
- Enhancement of the settlement edge in terms of design and creation of public open space.

It is considered that by retaining the existing landscape features, setting back development from the stream, coupled with the provision of a riparian corridor and green infrastructure enhancements whilst redeveloping the existing employment area for residential use, a net developable land of approximately 3.1 hectares could

be achieved. With sensitive boundary treatments and landscape strategy measures being adopted to inform the emerging scheme layout it is also considered that a higher density of development could be achieved within the site, without harm to the wider landscape or visual context.

As noted above, the SALA assessment for the site and Landscape Sensitivity Assessment both consider the site to have a Medium sensitivity for housing development. However, for the reasons outlined above, the sensitivity of the site for the proposed residential development should be reduced to low, especially as the site is already partially within, and adjacent to, the existing settlement boundary and protects the wider rural and historic landscape character.

Biodiversity

An Ecological Enhancements Briefing Note sets out the current ecological qualities of the site and a number of mitigation and enhancement measures that have been incorporated into the development proposals.

The Briefing Note concludes that the proposed development retains the habitats of greatest value within the site and provides a significant buffer to the adjacent stream. The proposals also include a large amount of green open space and include a pond with areas of wildflower grassland, which will provide a range of opportunities and increase the overall biodiversity within the site.

Additionally, the note states that the improved management to the stream and its banks could encourage Water Voles and Otters to utilise the stream and the habitats within the site.

Additionally, in the council's assessment the site was determined to have a negative (-) effect on biodiversity/geodiversity. The justification for this score is that the site is located within 250m of Nind Trout Farm and Ozleworth Brook Key Wildlife Site (KWS). The site is approximately 150m from the KWS. The majority of the KWS is located upstream, and the proposed Sustainable Urban Drainage System (SuDS) would prevent any hydrological impacts to the KWS and Nind Trout Farm.

Conclusion

In light of the technical reports produced since the council's Sustainability Appraisal, we believe that the site's assessment within this document needs to be updated. The table below shows the site's original assessment with an additional column showing our suggested amendments:

SA Objective	Score	Justification	Suggested Amendment	
SA 1: Housing	+	This site has capacity for 100 homes.		
SA 2: Health	-/+	The site is not located within 800m of a GP. The site is located within 800m of a council play area, a green space and a protected outdoor playspace. The site is not located within 400m of a walking or cycle path.	-/++	The site would also include a large area of open space including a wildlife corridor and a dedicated sports pitch for use by and in the control of Kingswood Primary School
SA 3: Social Inclusion	0	Residential site options will all have negligible effects on this objective.		
SA 4: Crime	0	Residential site options will all have negligible effects on this objective.		

SA 5: Vibrant Communities	0	This site is on majority greenfield land. A commercial depot (Soils UK) currently occupies an area of land in the NE of the site.		
SA 6: Services and Facilities	0	This site is at a third-tier settlement.	+	The site is a tier 3a settlement, the draft allocation South of Warwick Road scored + on this point under the same justification.
SA 7: Biodiversity / geodiversity	-?	The site is not within 1km of an internationally or nationally designated site. It is also not within 3km of Rodborough Common SAC or within 7.7km of the Severn Estuary SAC/SPA/Ramsar site. The site is however located within 250m of Nind Trout Farm and Ozleworth Brook KWS.	+	As set out in the accompanying Ecological Enhancements Briefing Note, the improved management of the stream and its banks could encourage Water Voles and Otters to utilise the stream. Other initiatives as part of the development proposals include large area of open space, grassland, landscape planting, SuDS, a wildlife area and a pond which will also contribute to biodiversity enhancements. It is also considered that the proposed development would not impact the KWS.
SA 8: Landscape/townscapes	-?	This site is in an area which was rated in the Landscape Sensitivity Assessment as being of medium sensitivity to residential development. It is not within the Cotswold AONB or within 500m of the AONB.	0	The sensitive nature of the landscaping proposals would enhance the edge of Kingswood Village. Furthermore, the site has a better relationship with the built-up area of the village than the draft allocation PS38.
SA 9: Historic Environment	-	This site scored 2 in the SALA heritage	0	The accompanying heritage report

		assessment.		demonstrates residential development can be achieved at the site without materially affecting the significance of any heritage assets.
SA 10: Air Quality	0	The site scored 67 in the Stroud SALA Transport Accessibility Assessment.		
SA 11: Water quality	0	The site is not within a Drinking Water Safeguarding Zone or a Source Protection Zone.		
SA 12: Flooding	-	The site is on greenfield land outside of flood zones 3a and 3b.		
SA 13: Efficient use land	-?	The site is relatively small in size and on greenfield land. The site is within an area of Grade 3 agricultural land.	-	It is considered that through appropriate landscaping a higher density of development could be achieved at the site without harm to the wider landscape or visual context; ensuring the efficient use of land made available for residential development.
SA 14: Climate change	0	Residential site options will all have negligible effects on this objective.		
SA 15: Waste	0	This site is on greenfield land.		
SA 16: Employment	+/-	The site is located within 600m of key employment sites (Abbey Mill Industrial Area; Orchestra Works) but is not at a Tier 1 or 2 settlement. The site is currently in employment use.	+/-	Kingswood has a higher employment offering than that of a typical tier 3a settlement, especially in the context of the allocated expansion of Renishaw New Mills. Furthermore, the employment use of the site is dated and has very limited capacity for job opportunities and is

				unsuited to neighbouring residential uses in terms of noise etc. This use is effectively being replaced by a sports pitch to be used by the school.
SA 17: Economic growth	+	The site is located within 800m of at least one existing primary school but is not within 800m of an existing secondary school.		

The updated scoring provided above means that the site has an improved score relevant to its suitability for the proposed development identified above, and in doing so would mean the score being achieved which is the same or better than the Council’s currently preferred site in Kingswood. Thus supporting it for development alongside land south of Wickwar Road, Kingswood and therefore for additional development in the district’s villages, which in turn is required to support rural communities and support development which is already sensibly located where it relates and is proportional to existing development.

Summary and Conclusions

This letter has set out that there is potential for further growth in Kingswood in line with the settlement hierarchy.

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

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

Yours faithfully,

[Redacted Signature]

[Redacted]
Ridge and Partners LLP
 [Redacted]

enc.