

Date: 08 March 2019
Our ref:
Your ref:



Stroud District Council,
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

Dear Sir or Madam,

**Representation for the Stroud District Local Plan Review (SDLPR)
Land adjoining the southern boundary of Fieldway, Upton St Leonards**

This representation has been put forward to illustrate why proposed housing allocations should be considered in Upton St Leonards and why the above site should be considered for a residential allocation in the Stroud District Local Plan Review.

Stroud Local Plan Review - Settlement Hierarchy

Upton St Leonards is set out in the Emerging Strategy as a tier 3b settlement that typically has a more basic level of facilities than tier 3a settlements.

Tier 3b settlements do not propose to allocate housing growth over the next plan period, in contrast to tier 3a settlements which propose to allocate a total of 3,995 dwellings.

The Stroud District Settlement Study – November 2014, contains information which has been used to determine the emerging local plan’s settlement hierarchy. Each settlement has been analysed based on its access to local and strategic services. Upton St Leonards has a total combined score of 5, as it has 1 strategic facility and 4 local facilities. In reviewing comparable settlements, Upton St Leonards has a higher service and facility score than all the tier 3a settlements selected to accommodate housing growth in the emerging local plan review.

The settlement study also looks at each settlement’s accessibility to other services by both car, bus and walking times. In this instance Upton St Leonards is rated fair, above all but one of the 3a settlements. The only one which surpasses this is North Woodchester which has a proposed allocation of 54 dwellings over the next plan period.

Upton St Leonards has a greater or equivalent level of access to community services and facilities than other 3a tier settlements. It is considered Upton St Leonards should move up from a tier 3b settlement to a tier 3a settlement, and as a result it is able to accommodate a proportion of the housing growth (3,995 dwellings) set out in the Emerging Strategy.

Furthermore, it should be noted that out of all the tier 3a settlements that Newtown & Sharpness has been selected to allocate circa 69% (2,770 dwellings) of all its proposed growth over the plan period.

It is questionable whether Newtown & Sharpness will be able to deliver the proposed housing growth over the plan period, due to potential slow delivery and build rates which could result in a deficit for Stroud's future housing supply. It should be considered that this allocation is distributed more evenly to areas which are considered to have good access to strategic and local facilities such as Upton St Leonards.

It can be seen extrapolating evidence from The Stroud District Settlement Study and applying it to the emerging local plan review, the settlement hierarchy is not sound and Upton St Leonards should be moved higher in the settlement hierarchy, and further Upton St Leonards would be considered as a residential allocation in keeping with other 3a settlements which have good access to facilities and public transport.

Land adjoining the southern boundary of Fieldway, Upton St Leonards

The above land set out in the supporting location plan, is in a sustainable location because it is located on the outskirts of Upton St Leonards which forms part of an urban extension to Gloucester. The site is located circa 3.5 miles from junction 11a of the M5 motorway and has access to numerous facilities in the village and Gloucester's wider area.

It should be considered that Upton St Leonard's future growth is extremely restricted, because as noted in the 2017 SALA, its principal physical constraints are the floodplain to the south west and north east; the proximity to the M5 to the west and the Cotswold AONB which adjoins the settlement to the south and east.

The latest Landscape Sensitivity Assessment sets out that Upton St Leonard's preferred direction for housing growth in landscape terms is to the south east to improve the settlement edge to become better screened and indented. The future development of SALA sites UPT002, UPT003 AND UPT004 along with the subject site (UPT012) will round off the built form of the village.

A desktop appraisal of significant issues on and around the site has been undertaken to inform this representation:

Heritage

The nearest heritage asset is Teckels Cottage (1154997) which is Grade II listed and is located circa 125 metres from the site's boundary to the south. It is separated by a field and allotment and there is a satisfactory buffer in place to ensure that the site's development will not adversely impact the heritage asset.

Landscape

The site is flat and is not set within any sensitive landscape designations apart from being located in the open countryside. Its development along with SALA sites UPT002, UPT003 AND UPT004 could help round off existing development.

Ecology

The majority of the site is in agricultural/equestrian use with limited if any ecological benefit. The ecological benefit of the site is likely to relate to boundary features of the site which will both be retained and improved upon by new tree planting in any future development.

Access

Access to the site is via a gated entrance from The Stanley which has good visibility in both directions. A public footpath referred to as Upton St Leonards footpath 36 runs to east of the site. The footpath is outside the site's boundary and will not need diverting.

Drainage

Environment Agency Flood Risk mapping for land-use planning indicates that the majority of the site is located in flood zone 1. This indicates that the overall site has a low probability of flooding (less than 1 in 1,000 annual probability of river flooding) and can be developed.

A small section to the east of the site is located in flood zone 2, and this area which measures circa 0.25 hectares is not proposed to be developed and will be used as open space for future residents.

Affordable Housing

The adopted Stroud Local Plan sets out that there is a shortfall of affordable dwellings and that an additional 446 per annum are required.

In considering the above, there would appear to be no overriding physical constraints or potential impacts preventing sensitively located development for a small to medium scale residential scheme.

Bruton Knowles would like to express that the site is under single ownership and that it is immediately available and deliverable over the next 5 years. For these reasons the site would make an appropriate residential allocation.

Below we provide the following answers to your consultation document insofar as they relate to our client's site.

Question 1.0a Have we identified the top 5 issues for you?

Yes. The identified issues seem a reasonable approach, however housing allocations should be more evenly distributed between tier 3a and some 3b settlements, because there is an overreliance on the delivery of housing in Newtown & Sharpness.

Question 1.0b Do you agree with the ways we intend to tackle these issues?

The promotion of development within Gloucester's fringe needs to be explored further because access to facilities and infrastructure is greater than other settlements identified for housing growth near Stroud.

Question 2.1a Do you agree with the ways in which the emerging Strategy intends to support the local economy and the creation of jobs?

[REDACTED] to release further land by the motorway which would benefit the local economy of jobs.

[REDACTED] 3a Do you agree with the ways in which the emerging Strategy intends to meet local [REDACTED]

The urban expansion of fringe development is encouraged by National Policy. In this instance, it is considered an opportunity is being missed to release a greater amount of land to meet this need.

Question 2.3b Do you support an alternative approach? Or have we missed anything?

As discussed above, an opportunity is being missed to provide a greater area of land around Gloucester's fringe due to its non-flood risk, and proximity to the wider motorway network. Our client's land would assist this and would help round off the built form of Upton St Leonards, as set out in the Landscape Sensitivity Assessment 2014.

Question 4.2a Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

As set out above, housing growth should be more evenly distributed between tier 3a settlements and it should be considered that some tier 3b settlements (such as Upton St Leonards) have the capacity to accommodate a proportion of this growth (3,995 dwellings).

Question 4.2c Have we identified the right towns and villages for growth? Or do other settlements have growth potential? (and 4.3a)

Insofar as relates to our client's land it is considered incorrect and it should be considered that Upton St Leonards should be promoted from a tier 3b to 3a settlement based on evidence provided

in the Stroud District Settlement Study (Nov 2014). Upton St Leonards should be considered a settlement where growth is directed towards.

Question 4.4c & d Do you support the proposals to allow some limited development beyond settlement development limits?

Yes. Development beyond the settlement limits is welcomed.

Should you have any queries please let me know.

Yours sincerely

[Redacted signature]

[Redacted name]

[Redacted contact information]

Planner