

9 January 2019

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Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB


www.ridge.co.uk

Dear Sir/ Madam

Submission of Representations on the Local Plan Review Emerging Strategy Paper

On behalf of my client,  please see below our representations in relation to the Local Plan Review Emerging Strategy Paper. My client currently owns and operates DE Spencer and Sons which is located within the settlement of Nupend. DE Spencer and Sons is a Civil Engineering firm who have occupied the site since the 1980's. The owners are looking to retire in the next few years and they are now looking at alternative options for the site, including residential development. This is a brownfield site with several commercial buildings currently on the site. The site is considered to be in a sustainable location close to the A419 and M5. With the west of Stonehouse development coming forward, residents will have access to additional services and facilities.

This site has also been submitted as part of the Council's 'call for sites' which is running concurrently.

Having regard to the questions within the submission document, the following responses are provided:

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

It is agreed that the plan should seek to maximise development on brownfield sites. However, this should not only be within the settlements boundaries of larger settlements. The NPPF at paragraph 118 gives substantial weight to the *"value of using suitable brownfield land within settlements for homes and other identified needs"*. As a result, the strategy within the Local Plan should be to look at all brownfield land across the district. Within rural areas, the NPPF also encourages planning policies to *"identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby"* (paragraph 78). As a result, all sites should be considered on their own merits and development in small settlements should not be discounted on size alone.

Local Economy and Jobs: Question 2.1b: Do you support an alternative approach? Or have we missed anything?

It is agreed there is a need for employment sites, but the potential redevelopment of sites for other uses should be looked at pragmatically, for example paragraph 121 of the NPPF is clear that LPA's should take a *"positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to: use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors"*. Given the changing nature of the economy, there is a need for flexibility within the Development Plan.

A Local Need for Housing: Question 2.3a: Do you agree with the ways in which the emerging Strategy intends to meet local housing need?

It is agreed that the housing numbers need to be increased. The Government has set an ambitious target for housing growth across the country and all Councils should be contributing to this growth. Paragraph 59 of the NPPF supports the governments objective of significantly increasing the supply of housing. There is a clear emphasis on delivering housing on brownfield sites and meeting the needs of the local population.

However, the Council should not only focus on urban areas for the delivery of residential development. Paragraph 78 of the NPPF highlights that *"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support the services in a village nearby."*

A research paper prepared by the CLA in November 2018, entitled 'Sustainable Villages – Making Rural Communities Fit for the Future', concludes that more than 2,000 villages are missing out on new affordable homes because they are classified as unsuitable for growth by the local planning process. This results in housing delivery in these areas being restricted, further exacerbating the rural housing crisis. The research paper argues that planning criteria must be updated to reflect how people access services in the 21st century and encourages local authorities to be more proactive in identifying the housing needs of small rural communities.

Options for growth

It is acknowledged there is a need to deliver large strategic sites to enable the Council to meet its housing need. However, it is also considered that development should be dispersed across the wider district within all settlements. The Planning Practice Guidance is clear that

"a thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities."

Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence." (ref: 50-001-20160519)"

As has been set out above, strategic policies are preventing additional housing coming forward in rural villages and therefore exacerbating the housing crisis. As a result, the emerging plan should seek to deliver housing through strategic sites in tandem with dispersed development throughout the District to help maintain the vitality of rural communities.

Settlement Hierarchy: Questions 4.3c: Do you support the idea that the Local Plan should seek to manage the cumulative impacts of growth on individual settlements? How should we develop a policy framework to achieve this?

There is some benefit in settlement hierarchies in terms of controlling the level of growth. However as has been set out above, there is a need for development in all settlement to help meet the housing needs of the District. Small-scale development commensurate to the size of the settlement can help to provide much needed housing in these areas. Furthermore, consideration must also be given to the changing character of settlements. The west of

Stonehouse development will undoubtedly change the character of Nupend and will provide residents with additional facilities and services in close proximity to the settlement. As a result, Nupend should be seen as a settlement which should accommodate additional development in the future.

I trust that the above will be considered but please do not hesitate to contact me if you require any further information.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Senior Planner
For Ridge and Partners LLP