

## Stroud District Local Plan Review Examination

### Response to Matter 6i: The Cotswold Cluster Site Allocations

For and on behalf of: Charterhouse Strategic Land

February 2023

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#### Introduction

1. This Hearing Statement is for and on behalf of Charterhouse Strategic Land (CSL) (representor no. 865) with respect to the Stroud District Local Plan Review (SDLPR) submitted for Examination by Stroud District Council (SDC).
2. It is concerned with **Matter 6i** (The Cotswold Cluster Site Allocations) as set out in the Inspectors' Matters, Issues and Questions (MIQs) (Examination document reference: **ID-05**).
3. The Hearing Statement has been prepared on the basis:
  - a) that the Inspectors have received and reviewed in detail the representations previously submitted to the Stroud District Local Plan Review Pre-Submission Draft (May 2021) on behalf of CSL.
4. This Statement does not repeat previous representations, which must be read in conjunction, but makes points relevant to the Matter in question in the following sections.

## Local Sites Allocation Policy PS41 Washwell Field, Painswick

**Question 50:** *The site is allocated for up to 20 dwellings and open space uses.*

- a. *As regards the site's location within the AONB our queries are as follows:*
  - i. *Has its allocation within the AONB been robustly justified and is this suitably recognised within the policy?*
  - ii. *How will a decision-maker determine that 'landscape impacts within the Cotswolds AONB' will be minimised when determining future applications for the site?*
  - iii. *Is the Council's conclusion that the site does not constitute major development, in the context of paragraph 177 of the Framework, justified?*
- b. *How much open space is sought within the site and is this justified?*

5. These are questions for SDC to answer.

6. CSL's concern is the lack of thorough or detailed evidence available in the Plan or its evidence base that has established and evaluated the proposed allocation in terms of its landscape impacts or impact on the AoNB in comparison with other potential sites in Painswick, including CSL's own land interest at Clattergrove, adjacent to the A46.

- c. *The evidence in EB39 Appendix A includes statements that, in regard to this site, there are 'no significant heritage constraints'. The site adjoins the garden grounds of the Grade II listed Washwell House and there are two conservations areas (Painswick and Gyde House) within the surrounding area. The policy refers to 'conserving heritage assets and their settings' and the supporting text mentions 'heritage properties along Cheltenham Road'.*

- i. What assessments have been carried out of the impact that the development of the site may have on the significance of all relevant heritage assets? How has this informed the decision to allocate the site?*
  - ii. Is the approach in the Plan justified and is the wording in the policy consistent with national policy and legislation on the historic environment?*
7. CSL have raised concerns with SDC throughout the Plan's preparation that there has not been any headline or detailed assessment of the significance of the designated heritage assets or the potential impact of residential development of site PS41 contrary to Chapter 16 of the NPPF.
8. No such work has been prepared by SDC and the Council's answer appears to be that this can be left to a planning application stage.
9. This is inappropriate as there may be significant heritage impacts arising from residential development of the site. For the site's inclusion in the Plan to be sound it is necessary to assess the significance of the heritage assets and then the level of harm that may arise before any conclusion can realistically be reached that this is a suitable site for development. This is in order to accord with the NPPF at paragraph 184, et seq.
10. CSL's concern over the lack of detailed heritage impact assessment is raised in the context of the PS41 site as the only proposed residential development allocation in Painswick (or indeed in the whole Cotswold Cluster). There is no flexibility and clearly it is essential for such a Site proposal to be scrutinised in detail as part of the allocation process.
  - d. What specific ecological, landscape and access issues need to be addressed? Why does the policy refer to 'potential' impacts?*
11. PS41 refers to potential impacts because there has not been sufficient survey, assessment and conclusion as to appropriate mitigations (if any) of the potential ecological, landscape or access issues that development of the site may require.

12. Turning specifically to access issues, CSL has raised concerns in this respect during the plan's preparation. Their representations to the Pre-Submission Plan considered, in some detail (including a separate report prepared and provided to the Council during the plan's consultation period) that there were access concerns with regard to vehicular access conflict and safety. The two key areas of concern and impact were:
- a) the narrow and restricted width of Lower Washwell Lane that limits the ability for that road to safely accommodate additional traffic generated by new residential development as well provide for service / emergency vehicles and for pedestrians; and
  - b) an inability to secure an adequate and safe connection from Lower Washwell Lane at its junction with the A46 road. This junction is especially narrow and without any exiting visibility splay or the potential to create one given the existing built form at this location.
13. It remains CSL's view that the proposed allocation would not meet the requirements of NPPF 108 (b) and (c) concerning safe and suitable access for all uses and that the significant impacts from the development on the transport network and on highway safety can be cost effectively mitigated. Similarly, the proposed allocation would also have an unacceptable impact on highway safety and would not accord with NPPF 109.
14. SDC's approach to site PS41 appears to be that this is all fine to leave until the planning application stage and that there are no fundamental constraints. CSL disagrees.
- e. *Is the policy wording that affordable housing will be for those with a local connection justified? How will this be assessed?*
15. CSL has not seen any evidence or information that sets out what the affordable housing need for those with a local connection' within the AONB is, or what the specific justification (see Stroud District Local Plan Review: Draft Plan Consultation Report , April 2021, at Section 5 from page 182) to "*need arising from within the AONB in 2020 which cannot be met elsewhere*" is referring to.

16. There is simply no clarity on how this has been or would be assessed and whether local housing need might relate to Painswick, to the Cotswold Cluster or the whole Cotswold AoNB.
17. CSL also draw attention to the lack of evidence of local housing needs analysis in either Painswick or the Cotswold Cluster (see CSL's separate Matter 2 statement) that has informed the preparation of the SDLPR prior to its submission for Examination.
18. For site PS41 the target of up to 20 new dwellings appears to be at odds with SDC's evidence in the 2017 Strategic Assessment of Land Availability (SALA) (**EB19** and appendices) which (setting aside CSL's concerns about the level of detail of assessment) concluded a total housing yield of 10 – 15 dwellings and based on a low density residential development and accounting for landscape buffers and the site's general location.
  - f. Some of the representations raise concerns about other issues affecting the site including a restrictive covenant, the impact of additional traffic, and inadequate local services. Have these factors been suitably assessed as part of the process to allocate this site?*
19. CSL's view is that the other issues raised by representations reflect the overall lack of attention to undertaking a detailed, realistic, assessment of PS41 site during the plan preparation process and drawing conclusions as to the extent to which they could be resolved or mitigated as necessary.
20. There is not sufficiently clear evidence and analysis provided to demonstrate that the site is deliverable or developable for residential use. There is no clear information available that resolves or responds in detail to the concerns of consultees (including CSL) as to the potential for highways access, safety, ecological and heritage impacts arising from residential development of PS41.

## **Making the Plan Sound**

21. For the reasons set out above and in the Pre-Submission Plan representations, CSL conclude that the proposed site allocation PS41, Washwell Fields should be deleted from the Local Plan.

22. Alternative sites should be identified and allocated in Painswick in order to provide sufficient flexibility and certainty of deliverability over the plan period. This should include CSL's site interest at Clattergrove, Painswick which is a sustainable and deliverable location for residential development to support the settlement's future needs.