From: 19 January 2020 09:57

To: \_WEB\_Local Plan
Subject: Consultation on Draft Local Plan

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## **Unsound classification of Tier level**

The reclassification of Painswick from Tier 3 (accessible settlement with limited facilities) to Tier 2 (Service Centre) is unsound being based on source information that is neither current nor correct.

The last time the existing Stroud Local Plan was inspected by Stephen J Pratt in November 2015 he confirmed that Painswick's Tier 3 had been allocated by SDC using a consistent, logical and evidence-based process. The Inspector saw no reason to challenge the analysis in fact he thought it to be an appropriate, effective and soundly based settlement hierarchy.

Comments made in recent desk-based studies produced to inform the draft Local Plan such as the Settlement Role and Function Study update 2018 are based in part on an old survey undertaken in 2009. Incorrect conclusions have therefore been drawn erroneously defining Painswick as a Service Centre and therefore concluding Painswick was similar to Minchinhampton, Berkley and Cam in this regard.

A simple walk around the respective retail offerings of the settlements would clearly demonstrate that an inappropriate conclusion has been drawn by this reliance on outdated and therefore incorrect source data.

Painswick should retain its current status of tier 3 in the Settlement hierarchy.

## **Habitat Regulations**

A Habitat Regulations Assessment of the Stroud Local Plan at Emerging Strategy Stage was prepared by Footprint Ecology in November 2018. This considered the implications of the Plan and site allocations for European wildlife sites in terms of any possible harm to habitats and species. A variety of buffers were devised to screen for potentially significant effects, 5 km for the Cotswolds Beechwoods. Potential site allocations within these areas require appropriate detailed assessments including visitor surveys and potential mitigation strategies to be proposed. Development sites within 5 km of the Cotswolds Beechwood SAC require mitigation measures and although a visitor survey of Cotswolds Beechwood has been undertaken. Mitigation measures have neither been proposed nor agreed. It is for the competent authority to gather the information and evidence necessary for the appropriate assessment to give them certainty that adverse effects will not occur. Fundamentally that therefore means that in the absence of certainty, the plan or project should not normally proceed.

## Washwell Field (PS41)

Inclusion of PS 41 runs counter to the stated objectives of the draft Local Plan and does not take account issues raised by supporting documentation.

The vision for the Cotswold Cluster (Page 140) sets out that the Cotswold 'brand' is of key importance economically to the region making it important to cater to high quality tourism needs that are in line with the relative affluence of the region. However, the vision also explains that inclusiveness in this area is important so that all residents feel the benefits of increased tourism. The approval of 20 houses on this site would have for many reasons a negative effect in meeting this aspect of the Cotswold Cluster vision.

A housing estate which in all likelihood would comprise of 4- and 5-bedroom houses would not meet a locally-identified need.

The Cotswold Cluster vision states that preservation of the area's landscape and heritage assets will be of great importance and that it will be necessary to find a balance in the region between the needs of residents, tourists and the area's role as a 'protected landscape'. As part of this balance the preservation and enhancement of the area's landscape, character and built heritage is considered to be great importance. PS41 will have an adverse effect on all these aspects.

Washwell Field (PS41) falls outside the settlement boundary and within the Cotwolds Area of Outstanding Natural Beauty (AONB) which has been designated in recognition of its rich, diverse and high-quality landscape. Many planning applications have been rejected on this basis alone for many years.

Possible adverse impacts of protecting water sources in the vicinity which could have a significant negative effect on water quality. (ref. LUC's Sustainability Appraisal Report for the Stroud District Local Plan Review: Emerging Strategy Paper)

Washwell Field's (PS41) location has been identified as having medium/high sensitivity to development as set out in the Landscape Sensitivity Assessment for Stroud Sustainability Appraisal Report for the Stroud District Local Plan Review. Development at this location would have a particularly adverse impact on landscape character in the area.

Washwell Field (PS41) is close to Cotswolds Beechwood (SAC) and necessary mitigation measures to satisfy current Habitat Regulations have not been agreed, on that basis the Plan should not proceed.

The emerging growth strategy supports development which is to occur on areas of greenfield land and this is likely to result in an increased level of flood risk, due to increasing the area of impermeable surfaces. Washwell Field (PS41) is such a sloping greenfield site and is within Flood Zone 3a. As such it is expected that the development of this site would have an adverse effect in terms of flood risk to the properties situated below it.

Inclusion of Washwell Field (PS41) is expected to have a detrimental impact in terms of promoting efficient land use and preserving higher value agricultural soils in the area. This greenfield site containing grade 3 agricultural soil will likely to be lost as a result of development.

## PS 41 is Undeliverable

The Washwell Field (PS41) site is undeliverable for two principle reasons:

- 1. There is very poor access to the site via Lower Washwell Lane, and without adequate access, development of the site will not be approvable.
- 2. A Restrictive Covenant preventing building on part of the site is lodge is registered with HMLR. This protects a strip of land behind all of the properties on Lower Washwell Lane and extending about 30m into the site.

Kind regards		