

17th January 2019



Cambridge House
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Local Plan Review

The Planning Strategy Team
Stroud District Council
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Dear Sirs

STROUD DISTRICT LOCAL PLAN REVIEW: EMERGING STRATEGY PAPER, NOVEMBER 2018 – CONSULTATION RESPONSE ON BEHALF OF CHARTERHOUSE STRATEGIC LAND

We are instructed by and write on behalf of Charterhouse Strategic Land (CSL) with respect to the *Stroud District Local Plan Review: Emerging Strategy Paper* (November 2018).

CSL welcome the opportunity to review and comment on the Emerging Strategy Paper and trust that the important matters set out herein will be given detailed consideration.

Context

CSL has a significant land interest at Painswick. It is an agricultural site extending to some 3.13 hectares with existing residential development to the south-west and also to the north. The Site is situated to the north of Painswick centre immediately adjacent to the A46 Cheltenham Road near Clattergove. The accompanying Site Location Plan identifies the extent of CSL's interest.

The Site has been submitted in response to the 'Call for Sites' exercise that the District Council is currently running in parallel to the Local Plan consultation.

Response to the Local Plan Emerging Strategy Paper Questions

The purpose of these representations is to provide a response to the current *Local Plan Review Emerging Strategy Paper* consultation. The comments made on behalf of CSL are set out below with regard to the various questions in the Strategy Paper.

Question 2.3a – A Local Need for Housing

The Emerging Strategy proposes to deliver at least 638 dwellings per annum over the period to 2040 (equating to some 12,800 new homes in total). It indicates in Section 2.3 that there will be a mix of brownfield and greenfield sites allocated of varying sizes to ensure that delivery is maintained in the plan period.

CSL support the overall principle and approach proposed. Meeting, in full, the identified housing needs for the District is a critical part of the District's responsibilities to deliver Government's national planning policy objectives.



The Plan's use of the Government's 'Standard Method' for calculating and setting the District's future housing requirement target is supported as it reflects the national policy and guidance approach.

It is noted that the use of the 'standard method' will result in an approximate 40% increase in the District's housing target (current Local Plan target is 456 dpa) and that the level of recent completions has not reached more than 497 dwellings. It is however essential that housing needs are effectively identified and met in the District.

The Emerging Strategy's overall recognition of the importance in meeting housing needs is welcomed and the joint work, currently underway with other Gloucestershire authorities to prepare a Local Housing Needs Assessment (identified at page 16 of the Emerging Strategy Paper) is an important component in the final evidence base for the Local Plan.

It is therefore incumbent on the Local Plan Review to identify a sustainable, deliverable distribution of new housing growth in order to ensure the timely delivery of new homes.

As CSL's response to other consultation questions sets out (see below) the role of smaller sites and lower hierarchy settlements (such as Painswick, a Tier 2 settlement) will be critical in meeting housing delivery requirements and ensuring an effective five-year housing land supply in addition to the contribution that strategic housing sites might make over the longer term plan period.

Smaller sites have a distinct advantage in efficient housing delivery as they tend to be less encumbered by physical constraints and require less new or improved infrastructure to be provided in order for them to deliver housing swiftly.

Smaller sites and lower tier settlements therefore offer opportunities for residential development and, in CSL's view, should be given greater prominence and priority in the Local Plan with a strengthened policy basis (coupled with appropriate site allocations) to enable this.

Question 3.1a and 3.1b – A Vision for the Future

The emerging Local Plan Vision for the future is set out in Section 3.1. CSL agrees with the overall thrust of the Vision statement as it seeks to describe a position in 2040 where the District has a good quality of life and is responsive to changing social and environmental conditions.

Question 3.1b asks whether there is an alternative approach or if the Vision is missing anything. CSL consider that the Vision should make a more explicit recognition of the importance of meeting housing needs across the District and the economic and social benefits of achieving this for smaller settlements as well as in the larger market towns. The Vision should therefore make more direct reference to the future strengthening of smaller settlements in the District's settlement hierarchy (including locations such as Painswick) to meet housing needs.

Question 3.2a and 3.2b – Strategic Objectives

CSL has reviewed the Plan's proposed Strategic Objectives in Section 3.2. The Objectives are supported overall, but it is considered that there needs to be a clear and explicit statement as part of SO1 (Accessible Communities) that identified future housing requirements will be delivered in full to ensure that there is a choice and mix of housing to meet future needs.

Without such explicit recognition in SO1 it is considered that this Objective is too imprecise and would not ultimately be effective as the basis for a sound planning strategy.



Question 4.2a, 4.2b and 4.2c – The Emerging Growth Strategy

Section 4.1 sets out the four options for growth that the Emerging Local Plan has considered at the Issues and Options stage and explains what further work has been undertaken through Transport Assessment and the Sustainability Appraisal to deliver the Emerging Growth Strategy in Section 4.2.

The Emerging Growth Strategy is supported insofar as it seeks to identify and distribute the housing growth required as a result of the Government's 'Standard Methodology' approach.

CSL do not support the Emerging Growth Strategy with regard to the apportionment of future housing growth. As it stands this is considered to place an over-reliance on emerging strategic locations / sites for housing and conversely fails to properly support the long-term sustainability of lower tier settlements.

By way of illustration, Painswick, a Tier 2 settlement (as Section 4, page 39 in the Strategy Paper states) and well-connected, larger service centre with a range of facilities, services and infrastructure, has a proposed housing allocation on only one site (PS41 - Washwell Fields) for a total of 20 dwellings over the plan period.

This low level of future housing provision proposed in Painswick (and similarly for other such settlements) will not adequately support the needs of the settlement over the plan period and is unlikely to result in a sustainable, vibrant settlement. The spatial distribution strategy needs to ensure that there is a sufficient choice and mix of allocated land at sustainable locations (like Painswick) for new housing so that inclusive, balanced, sustainable communities are created.

Conversely, the Emerging Growth Strategy's reliance on larger and more strategic sites may serve to restrict the potential choice of housing locations for future residents in the District and also reduce the prospects of ensuring that housing needs are met in the immediate and shorter term. Put simply, larger strategic sites are more complex to deliver and inevitably take far longer to make a meaningful contribution to housing land supply and housing delivery and should be balanced with more, smaller sites.

In response to Questions 4.2b and 4.2c therefore, CSL's alternative strategy is to refine the Emerging Growth Strategy to place greater emphasis on the ability of lower tier, sustainable settlements, including Painswick, to provide a greater level of housing during the earlier part of the plan period to support overall housing delivery and sustain existing communities.

Question 4.3a – Settlement Hierarchy

CSL supports the movement of Painswick from Tier 3 to Tier 2 in the Settlement Hierarchy (Section 4.3) as highlighted on page 39 of the Emerging Strategy Paper.

It is agreed that Painswick meets the characteristics and conditions necessary to be considered as a Tier 2 settlement – larger settlements which have a 'strategic' role in providing services and facilities that serve a District-wide or wider than local catchment including a retail role and a good / excellent level of other services and facilities.

Question 4.4a, 4.4b – Settlement Development Limits

Section 4.4 is concerned with the approach and potential future role for defined settlement boundaries. The Plan notes that settlement limits are an established part of the strategy for managing growth since the 1990s.



CSL consider that the Strategy's approach to settlement development limits should be based on a policy and criteria-led approach rather than by prescriptive, inflexible boundaries that are often based on out-dated landscape character assessments and evidence which fail to reflect the reality now.

It is recognised that this would represent a departure from the existing approach, but there are substantial benefits arising from taking a policy and criteria-led approach as this allows a much more responsive, adaptable and positive Plan to be created and for decisions on individual development applications to be evaluated in a more comprehensive and balanced manner (in accordance with the emphasis on securing sustainable development in the NPPF) rather than by reference to blanket restrictions.

This is particularly important in CSL's view given the changing scale, nature and character of residential and economic growth that is likely to arise during the plan period to 2040. With rapid changes in terms of communications and transport technologies and a growing need for climate adaptation as well as the changing role/function of settlements and centres over time it is critical that the Local Plan is flexible enough to react to and indeed shape such change and growth. Fixed settlement boundaries are therefore an out-dated and overly restrictive approach in this context.

Given CSL's position, the preferred, alternative approach (in response to Question 4.4b) would be to establish a framework of appropriate, criteria-based planning policies that allow development proposals to be assessed on their merits and against the evidence and situation at the time of the application rather than against a rigid and overly-simplistic boundary definition approach. Therefore, CSL support Option 2 (as described on page 42 of the Emerging Strategy Paper) and which the Sustainability Appraisal Scoping Report concluded: *"may benefit housing and economy objectives if residential and commercial developments are able to come forward in wider locations where it can be established that there would not be harm as a result"*.

Question 4.4c and 4.4d – Settlement Development Limits

Question 4.4c and 4.4d are focused on whether proposals to allow some limited development beyond settlement boundary limits to come forward should be supported.

CSL's conclusion is that there should not be settlement boundary limits (as explained above in response to Q's 4.4a and 4.4b).

In any event, the Plan must have the ability to allow development beyond settlement limits, subject of course to relevant sustainability, environmental and design criteria in accordance with national planning policy.

Question 5.1a – Making Places: Potential Sites and Alternatives

CSL's comments in relation to Question 5.1a are concerned with development allocations in Painswick as set out in Section 5 at page 94.

The Emerging Strategy for Painswick identifies one site – PS41 (Washwell Fields) as a potential allocation for residential development in the plan period. Alternative sites are shown edged in blue on the Painswick key plan (although it is not easy to readily identify the extent of some of the sites on the plan).

There is little direct comparability between the proposed allocation site (PS41) and the alternatives shown; each possible site is of a markedly different size and would have very different characteristics in terms of development potential for new housing. There is no explanatory information in the Emerging Strategy Paper to explain why PS41 is preferred overall to the alternative sites identified; or that all



reasonable alternatives have been considered (including our client's Site on land adjacent to the A46 Cheltenham Road).

The *Strategic Assessment of Land Availability (SALA)* offers some background information (in the various appendices) on possible sites but does not draw a clear conclusion as to why PS41 is preferred, or whether all reasonable alternatives have been identified and assessed.

The *Sustainability Appraisal Site Options for the Stroud Local Plan Review (August 2018)* and the *Sustainability Appraisal: Report for the Stroud District Local Plan Review: Emerging Strategy Paper (November 2018)* prepared for the District Council by consultants LUC do undertake site level analysis of potential alternatives.

It is noted that the appraisals for each of the Painswick sites (PAI001, 002, et al) scores the sites highly negatively against the SA16 (Employment) criterion on the basis that the site is not within a Tier 1 or Tier 2 settlement. This is incorrect as Painswick is identified in the Emerging Strategy Paper as a Tier 2 settlement. Consequently, that particular indicator leads, in the case of Painswick sites, to a more negative outcome finding for each site in comparison to other sites and settlements elsewhere in the District.

Possible sites in Painswick are appraised in the SA against a series of Sustainability Objectives and then scored accordingly. A comparative table is included in the document, but there is no stated ranking or specific recommendation arising from this work which identifies a preference for proposed allocation.

Indeed, the Report states at paragraph 1.50 *inter alia* that the Sustainability Appraisal findings are not the only factor to consider when selecting site options and the reasons for deciding which sites to allocate will need to be recorded in the full SA.

As matters stand, there is not a clear rationale advanced for the proposed allocation of PS41, or why only one site has been allocated at Painswick. Landscape sensitivity is advanced at page 94 as a potential factor but it is clear that all of Painswick and many other settlements in the District have a landscape sensitivity. However, it is not accepted by CSL that such sensitivity should automatically out-weigh the potential for further residential sites to be identified and allocated in Painswick in order to help sustain this Tier 2 settlement and meet evident housing needs.

In this respect, CSL have submitted their land interest in Painswick to the District Council as part of the current 'Call for Sites' exercise (the Site Location Plan is appended). The land in question represents an accessible, available and sustainable location for new residential development and is capable of development while maintaining landscape character and visual amenity. The site's allocation would be to the benefit of Painswick and the District's overall ability to meet its housing needs. This site should therefore be carefully examined and included as a residential allocation at the next stage of the Local Plan Review process.

Conclusions

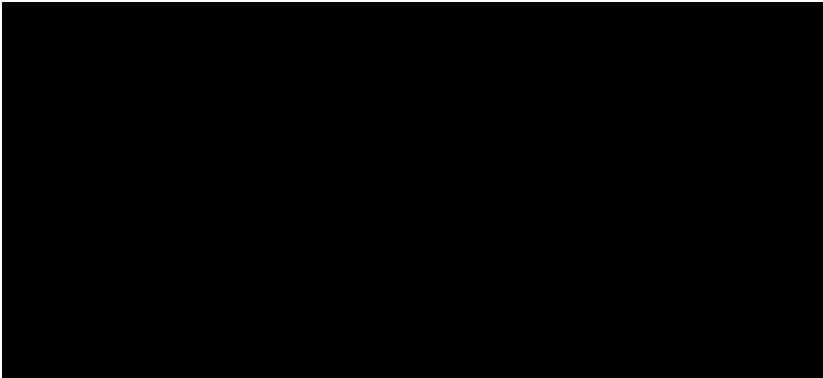
There are many positive aspects to the Local Plan Review Emerging Strategy. There is however a need to refine and amend the emerging Plan in a number of important respects so that an effective spatial planning strategy, which fully recognises and positively utilises site development opportunities particularly for smaller town settlements such as Painswick, is created which better supports the District to meet its evident, pressing, housing needs.

As outlined, our client's land interest in Painswick represents a suitable and sustainable location for residential development and we confirm that the Site is being submitted for consideration through the parallel 'Call for Sites' process.



We would be grateful if you will confirm safe receipt of this representation and can confirm that we would be pleased to discuss any aspect of our submission further at your convenience.

Yours sincerely,



For and on behalf of Charterhouse Strategic Land

Encl. Land adjacent to A46 Cheltenham Road, Painswick - Site Location Plan

Land West of the A46 Cheltenham Road, Painswick, Gloucestershire

Site Plan

