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Cambridge House  
Henry Street  
Bath  
BA1 1BT

### **Local Plan Review**

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

T: 0330 223 1510  
planning@chilmarkconsulting.co.uk

Dear Sirs

## **STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT PLAN FOR 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: Draft Plan for Consultation* (November 2019).

CSL welcome the opportunity to review and comment on the Draft Plan 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 (7.73 acres) 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 Site has been submitted in response to the 'Call for Sites' exercise and has been discussed with officers of the Council further during August 2019.

### **Representations**

These representations are concerned with various policies and proposals set out in the Draft Plan.

#### Section 2.2: Strategic Objectives

CSL has previously commented on the Plan's proposed Strategic Objectives in Section 2.2. The Objectives are supported overall, but CSL remains concerned that there is not a clear and explicit statement as part of SO1 (Accessible Communities) to state that the 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 CSL consider that this Objective is too imprecise and does not provide the basis for a sound planning strategy.



## Core Policy CP2: Housing Need and Distribution

The Draft Plan proposes to deliver at least 638 dwellings per annum over the period 2020 - 2040 (equating to some 12,760 new homes in total). It indicates in Section 2.5 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. This equates to a residual housing requirement (when taking completions and commitments into account) of at least 8,000 dwellings.

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.

It is incumbent on the Local Plan to identify a sustainable, deliverable distribution of new housing growth in order to ensure the timely delivery of new homes and meet national planning objectives set out in the National Planning Policy Framework.

CSL do not support the apportionment of housing development proposed. 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.

CSL consider that there is an enhanced role for smaller sites and lower hierarchy settlements (such as Painswick, a Tier 2 settlement) to make a critical contribution towards 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 such as Painswick therefore offer opportunities for residential development and, in CSL's view, should be given greater prominence and priority in the Local Plan with appropriate additional sites allocated to enable this.

Indeed, the level of provision proposed for Painswick (20 new dwellings at one proposed site – PS41, Washwell Fields) is not a sufficient response to the level of housing need in this settlement (see CSL's significant highways and heritage concerns relating to PS41 set out below in more detail). Additionally, it fails to demonstrate a commitment to the long term sustainability of key services and facilities in the settlement; furthermore it does not adequately support the objectives of Core Policy DCP1 (Delivering Carbon Neutral By 2030) that seeks, *inter alia* to locate new development where the form and mix of development or proximity to essential services and facilities minimises the need to travel.

Put simply, the distribution of housing needs to ensure that there is a sufficient choice and mix of allocated land at sustainable locations (including Painswick) for new housing so that inclusive, balanced, sustainable communities are created.

CSL conclude that the proposed apportionment of housing set out in Core Policy CP2 (Strategic Growth and Development Locations) should be increased to provide a greater level of housing provision for Painswick and offer a wider range and choice of potential housing sites.

## Core Policy CP9: Affordable Housing

Policy CP9 sets out the Council's policy for the provision of affordable housing and developer contributions.



The policy indicates a need for 425 new affordable dwellings per annum, although it is not entirely clear to CSL where this figure is derived from. It is assumed it is calculated based on the emerging findings of the *Consultation Draft Gloucestershire Local Housing Needs Assessment* (October 2019) (GLHNA) which provides a total of the key components of affordable housing by area at Figure 50. If it is from this source, it is clear that the analysis was not undertaken in the context of any local viability assessment to determine the precise affordable housing target or provide a view on deliverability (paragraphs 8.72 – 8.73 of the GLHNA refer).

In turn, there is no evidence in the GLHNA as to how draft Policy CP9's different levels of affordable housing provision (i.e. the threshold sizes of development, either 4+ or 10+ dwellings above which contributions will be sought) have been derived.

There is, in CSL's view therefore no certainty within the evidence base for policy CP9 that a sound, reliable and appropriate affordable housing requirement has been identified.

It is appreciated that the explanatory text and supporting information is to be provided to accompany the final version of policies in the Pre-Submission Plan anticipated in autumn 2020. A complete and clear evidence base is however critical in terms of establishing a sound policy basis for affordable housing provision overall and the contributions which may be needed from new development in order for the Draft Plan to be consistent with the National Planning Policy Framework at paragraph 63 which identifies that plans should not require affordable housing contributions from sites that are not 'major development' (defined in Annex 2 of the NPPF as ten or less units or sites of less than 0.5 Ha).

In addition, draft policy CP9 does not include any reference to a viability and deliverability testing mechanism to establish the ability of individual sites to make contributions towards affordable housing needs. This mechanism is critical and it needs to be set out in the policy wording in order to ensure housing land is identified taking account of economic viability as required by the NPPF including at paragraph 67.

### The Cotswold Cluster: Painswick

The Draft Plan's proposals for Painswick identifies one site at Washwell Fields (PS41) as a residential development allocation in the plan period totalling up to 20 new dwellings and associated community and open space uses including strategic landscaping.

It is not clear to CSL why only one new housing site totalling just 20 dwellings has been proposed for allocation in Painswick? The low level of housing allocation in Painswick represents just one additional dwelling for every year of the twenty year plan period and offers very little potential for growth, including supporting the economic and social sustainability of the settlement.

Indeed, the *Stroud District Settlement Role and Function Study: Update 2018* (May 2019) identifies sizes and growth rates of each settlement as at 2011 and in 2018. For Painswick the study found a total of 1,248 dwellings as at 2011 and a projected total dwelling stock of 1,268 as at 2018. The additional 20 units proposed in the Draft Plan therefore represents a dwelling stock increase of only 1.5% from the 2011 base and below the District's average. This is not a sufficient quantum of new dwellings to help support the future vitality of the settlement.

As there are no other residential development sites proposed, there is also a significant risk of under-delivery (or non-implementation) of the proposed housing site allocation in Painswick (with a consequent reliance on windfall sites of a permissions granted as a departure from the Plan as it stands).

This does not, in CSL's view, represent a robust or sound approach to providing a choice and mix of housing that meets the needs of this settlement in future. There is clearly potential for further



residential sites to be identified and allocated in Painswick in order to help sustain and support this Tier 2 settlement and help meet the District's housing needs.

An alternative and preferred approach would be to establish a framework of 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 (including changing levels of local housing need) rather than against a rigid and rather simplistic method (defining sites as either 'within', 'adjoining' or 'outside settlement') as shown in Figure 3: Proposed Development Strategy for Tiers 1 - 4. A more flexible approach would benefit housing and economic objectives for Painswick if residential and commercial developments are able to come forward at sustainable sites, i.e. treating each site and development proposal more clearly on its merits.

#### PS41: Proposed Site Allocation, Washwell Fields, Painswick

There is no clear explanatory information in the Draft Plan to show why Washwell Fields, Painswick (PS41) is preferred as the only residential allocation in the settlement.

The *Strategic Assessment of Land Availability* (SALA) and its most recent update (November 2019) 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.

CSL has reviewed the proposed allocation of PS41 and raises the following more specific concerns:

- there is highly restricted vehicular access to the site. This is both in terms of the width of the existing Lower Washwell Lane to safely accommodate additional traffic, service vehicles and pedestrians that would be generated from new development; and in securing an adequate, safe connection from Lower Washwell Lane at its junction with the A46 road which is especially narrow and without any visibility splay. CSL's highway and transport advisor has prepared a more detailed report (appended to this representation letter) which sets out the analysis undertaken and concludes that the proposed allocation of PS41 - Washwell Fields would be contrary to both national policies in the NPPF (especially at paragraph 108) as well as inconsistent with the objectives and policies of the Draft Stroud Plan (policies DCP1, CP4 and CP5 in particular). It is considered that the highway access and safety matters are of such concern as to render inclusion of PS41 as a residential site allocation as unacceptable and to do so would likely render the Plan unsound in this respect;
- there is potential for a significant adverse effect arising from new residential development to the setting of Washwell House (a Grade II listed property and therefore a designated heritage asset). There has not been any detailed heritage assessment evidence of the site's ability to accommodate residential development and the SALA conclusion that there is unlikely to be an effect is unfounded. For 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.

It is also noted that the Draft Plan identifies that PS41 could deliver 20 dwellings however the SALA site analysis (ref: PAI004 in the 2017 SALA) concluded that the total yield might be 10 – 15 dwellings given the need for landscape buffers and the general location. There is a realistic concern that, notwithstanding the evident site constraints and highways access issues identified, even if it were developed, the site would not provide a significant number of homes for Painswick.

Without alternative, additional housing allocations there is a real risk of a failure to deliver new housing in Painswick in the plan period.



### Site Omission PAI013: Land near Clattergrove, Adjacent to the A46, Painswick

CSL have previously submitted their land interest in Painswick adjacent to the A46, Cheltenham Road (known as PAI013, Land at Clattergrove in the SALA) to the District Council as part of the 'Call for Sites' exercise.

The site has been subject to a cursory review in the SALA *New Sites Update Report* (November 2019) at Appendix 4 and appears to have been rejected due to the likely landscape impact of extending the settlement into the AONB and detrimentally altering the rural character with the potential to coalesce existing, sporadic development.

CSL object to the omission of the site from inclusion in the Draft Plan and to the analysis and conclusions reached by the Council in the SALA for the site which do not reflect the discussion's held with Council planning policy officers in August 2019.

The site represents an accessible, available and sustainable location for new residential development. Indeed it is consistent with the approach for locating growth in Painswick (page 145 of the Draft Plan) which states that there is potential for housing growth within or on the northern edge of the town.

With appropriate building and landscape design it is wholly capable of providing for new residential development while protecting and maintaining landscape character and visual amenity. It can therefore be developed in the context and with respect for the character and purpose of the AONB in this area of Painswick. It would not, contrary to the assertion in the SALA's analysis, lead to coalescence as it would abut to existing, adjacent residential development which is not sporadic in morphology. It would enable a new, logical and clear boundary for Painswick. The development of the site would not extend the settlement into the AONB as, like all other land in and around Painswick it is already within the AONB designation.

The key attributes of the site can be summarised as follows:

- there are no nature conservation designations on the Site. The potential for development of the site would not pose a constraint to the statutory and non-statutory sites within proximity whilst the nature of the site habitat provides limited opportunities for protected species interest;
- forms part of a national, district and local landscape character assessment influenced by a sloping landform, rural character with pastoral farmland, extensive areas of woodland and stone built settlements and walls. In visual impact terms, the Site raises no concerns from the north, south and west whilst opportunities exist to safeguard longer range views from the east;
- is well located with good opportunities for safe and convenient access to the A46 Cheltenham Road maximising opportunities for cyclists and pedestrians as well as public transport and private vehicles;
- is of low flood risk (Zone 1);
- is not subject to any known heritage constraints;
- has no utilities constraints.

The site's allocation would be to the benefit of Painswick and the District's overall ability to meet its housing needs. This is particularly critical given the obvious restrictions and challenges that the development of site PS41 faces.

CSL's site should therefore be carefully re-examined and included as an additional residential allocation in order to support a choice and mix of housing sites in Painswick and to address the risk of non/under-delivery of housing from proposed site PS41.



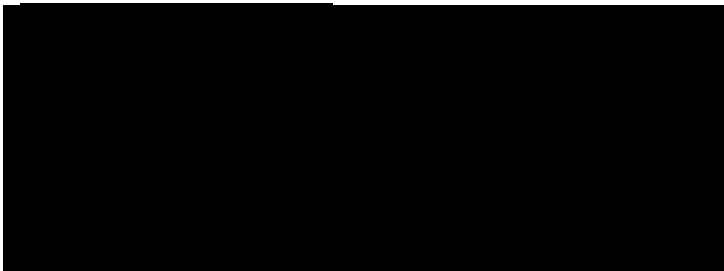
## Conclusions

There is a need to refine and amend the emerging Draft Plan in a number of important respects, including removing site allocation PS41 at Washwell Fields 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.

We would be grateful if you will confirm safe receipt of this representation.

Yours sincerely,



Director, Chilmark Consulting Ltd.

For and on behalf of Charterhouse Strategic Land

Encl. Technical Paper: Response to Consultation on the Draft Stroud Local Plan Concerning PS41, Washwell Fields; Calibro Consultants (2020)