

LF/P19-0079

Send by email: local.plan@stroud.gov.uk

16th January 2019

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

Dear Sir/Madam,

Representations to the Stroud District Local Plan Review – Emerging Strategy Paper (Nov 2018) - Land at Chipmans Platt

Pegasus are pleased to submit representations to the Stroud District Local Plan Review – Emerging Strategy Paper (Nov 2018) with regard to Land at Chipmans Platt on behalf of [REDACTED]

The site is situated within Eastington Parish and therefore within the area falling within the Stonehouse Cluster as identified in the Local Plan Emerging Strategy consultation document. The site is centrally located in the parish being situated immediately to the west of the A419 Chipmans Platt roundabout. A site plan indicating the location of our clients site is attached at Appendix 1.

The site was considered in the Strategic Assessment of Land Availability in 2017 (site ref: EAS008). However, in the Stroud District Local Plan Review – Emerging Strategy Paper (Nov 2018) the site is not considered by the Council at this time to have development potential for the plan period as part of the Stonehouse cluster, (EAS008 on the Stonehouse map on p.67).

Our client wishes to challenge the findings of the Local Plan Review to date and promote the development of the Chipmans Platt site through the Local Plan Review process for mixed use purposes (commercial and residential) given its sustainable location and proximity to existing and proposed development sites.

Existing Planning Policy

The current Stroud Local Plan was adopted in November 2015. The Policies Map for the adopted plan shows that the site is located outside the current settlement boundaries for both Stonehouse and Eastington.

The site is situated within the area covered by the made Eastington Neighbourhood Plan.

The adopted Stroud Local Plan is currently under review having been subject to an Issues and Options consultation in November 2017 when the site was promoted for development to the local planning authority by our client.

Local Plan Emerging Strategy Evidence Base

Strategic Assessment of Land Availability (SALA) (2017)

The site is included in the Council's Strategic Assessment of Land Availability (SALA) (2017) as site EAS008 'Land at Chipmans Platt'.

When considering the site's 'suitability' for future development the SALA stated that the site had 'future potential', it was also stated to be 'available' and 'achievable'. Clearly therefore the site is suitable for development, available and deliverable and has the potential to contribute to the authorities emerging five-year housing land supply position in the Local Plan Review.

The site is situated to the north of the Industrial Heritage Conservation Area that runs along the route of the Stroudwater Canal. No other heritage assets are identified as affecting the site. The site is not subject to any other designations or constraints except for a small percentage of the site situated within flood zone 2 and a further small percentage within flood zone 3.

The suitability summary of the SALA states that:

'The site is not currently suitable for housing development because of the relatively remote location of Chipmans Platt relative to existing established settlements with services and facilities. The lane is also narrow and rural in character. There are therefore physical constraints preventing sustainable development in this location. However, there may be future potential to consider a small sensitively designed housing or care home scheme here should adjacent land be developed in the future for residential, community and employment uses.' (emphasis added)

The development potential summary for the site states:

'Taking account of the character of the site and its surroundings, this site could be developed for low density development typically comprising a mix of detached and semi-detached dwellings at an average density of about 20 dph, and the suggested yield is 20 units. Alternatively, the site could be developed as a care home or other institutional use set within landscaped grounds.'

It is clear therefore that the Council's own assessment of the site is that it has development potential for residential, community or employment uses.

Stroud Local Plan Review Emerging Strategy Sustainability Appraisal (Nov 2018)

The site is assessed at Appendix 3 of the Sustainability Appraisal accompanying the current consultation at p.336.

The site scores positively with regard to the delivery of new homes, health, accessibility to employment opportunities and economic growth. However, the site scores negatively with regard to access to services and facilities; impact on local landscape, water quality, flooding and efficient land use.

With regard to these matters our client challenges the findings of the SA on the following grounds;

- Services and facilities – While the site is not directly located within a Tier 1-5 settlement it is located within 120m of a Shell Garage and within 200m of the Stonehouse Travelodge hotel which are both located to the north of the Chipmans Platt roundabout.

To the immediate west of the site is the William Morris College, a specialist college promoting work related learning and independence for young people with learning difficulties, assisting in their transition into adulthood.

The site is also located directly opposite the westernmost extent of the adopted Stroud Local Plan strategic allocation of Policy SA2 Stonehouse – allocated in the current adopted Local Plan (p.59). This strategic allocation has commenced development and will provide the following; 1,350 dwellings and 10 hectares of B1, B2 and B8 employment land; local retail and local community facilities; a two-form entry primary school; a primary vehicular access from A419 Chipmans Platt roundabout; enhanced transport connectivity with Stonehouse for sustainable transport modes and the private car.

The delivery of this strategic allocation during the existing plan period will ensure that our client's site has enhanced access to services and facilities over and above those that it has been assessed against in the SA.

The current Stroud Local Plan Review consultation document also highlights two large sites to the north-west of our client's sites as suitable for development – PS20a and PS20b – the proposed uses at these sites will also ensure that local services and facilities are brought in closer proximity to our clients site during the emerging plan period.

- Landscapes and townscapes – The site was identified in the Stroud Landscape Sensitivity work undertaken to provide evidence for the SALA (2017) as part of parcel St04 and found to have medium sensitivity for housing development and medium sensitivity for employment development.

Site St04 comprises the whole of the parcel from Chipmans Platt roundabout to the M5 motorway to the north west and includes the northern half of PS20b (which is considered to be suitable for development in the SLPR consultation document).

The SA states that the site was rated as medium – high/medium sensitivity for residential development, however, this is not borne out by the mapping in the

relevant evidence base which clearly shows the site as only having medium sensitivity to both housing and employment development.

- Water Quality – The site is located in a wider area that is identified as a Drinking Water Safeguarding Zone. This designation has not prevented the allocation of the current SA2 West of Stonehouse strategic allocation or the Identification of sites PS20a and PS20b as suitable locations for development – all three areas are also affected by the Drinking Water Safeguarding Zone¹, it is therefore not considered to be a constraint to development.
- Flooding – Only approximately a quarter of our client’s site is affected by flood zone 2 or flood zone 3 designations, therefore three quarters of the site is located within flood zone 1 and is not subject to any flood risk constraints. The implementation of Sustainable Drainage techniques for either residential or commercial development at the site in accordance with the NPPF (2018) could result in net gains in water quality and biodiversity at the site and therefore the fact that a small part of the site is located within these flood zones should not render a major negative score against flood risk. Moreover, employment development is considered to be a less vulnerable use in terms of the consideration of flood risk.
- Efficient use of land – The NPPF (2018) encourages the use of brownfield sites and the consideration of Best and Most Versatile Land designations during the plan making process. However, our client’s site represents a relatively small parcel of agricultural land that is effectively surrounded by either existing development (to the south or west) or highway (to the north and east). The site does not comprise a constituent part of an immediately adjacent wider agricultural holding and therefore is limited in terms of its attractiveness for agricultural purposes. The grade 3 agricultural land classification does not preclude the site from being suitable for development as evidenced by the suitability entry for the site in the SALA (2017).

Sustainable Location

The site is situated immediately to the south of the A419 approximately 0.5km south east of Junction 13 of the M5 on the main access route to Stonehouse and Stroud. The site is situated adjacent to an existing public transport corridor that provides services to Gloucester, Stonehouse and Stroud. Further sustainable transport infrastructure enhancements will be secured and implemented as the West of Stonehouse Strategic Allocation is built out.

The site is well placed, in accordance with the Gloucestershire Local Economic Partnership (LEP) Strategic Economic Plan (SEP) in close proximity to Junction 13 of the M5 providing excellent connectivity to the M4/M5 Almondsbury interchange and the regional cities of Bristol, Birmingham and Cardiff and locations beyond.

¹ <https://environment-agency.cloud.esri.uk.com/farmers/>

To the west of our client's site are two large sites considered to be suitable for development in the SLPR Emerging Strategy, with PS20 a) being identified for 10ha employment land, canal and open space and PS20 b) for a sports stadium and community uses. These sites are therefore considered by the Council to represent sustainable development having been proposed as part of the emerging development strategy for the Local Plan Review.

It is clear therefore that our client's site should also be considered as a sustainable location for mixed use development in the emerging plan period given the view the Council have taken with regard to PS20a) and PS20b) in the consultation document. Moreover, to ensure the comprehensive planning and consideration of land between Junction 13 of the M5 and Chipmans Platt roundabout our client's site should also be taken into consideration for allocation.

Suitability for development

Our client's site has been identified as suitable for development by the Council's SALA in 2017 with particular reference to the site coming forward '**should adjacent land be developed in the future for residential, community and employment uses**'. The Council's attention is drawn to their own evidence base comment regarding this matter given the comments made above with regard to sites PS20a) and PS20b).

Our client confirms that the site is in single ownership and that it is available for development with the ability to contribute to the Council's emerging five-year supply for either housing or employment land requirements.

I would be most grateful if you could please confirm receipt of these representations and advise on the next stages of the preparation of the Stroud Local Plan Review,

Yours faithfully,

[Redacted signature]

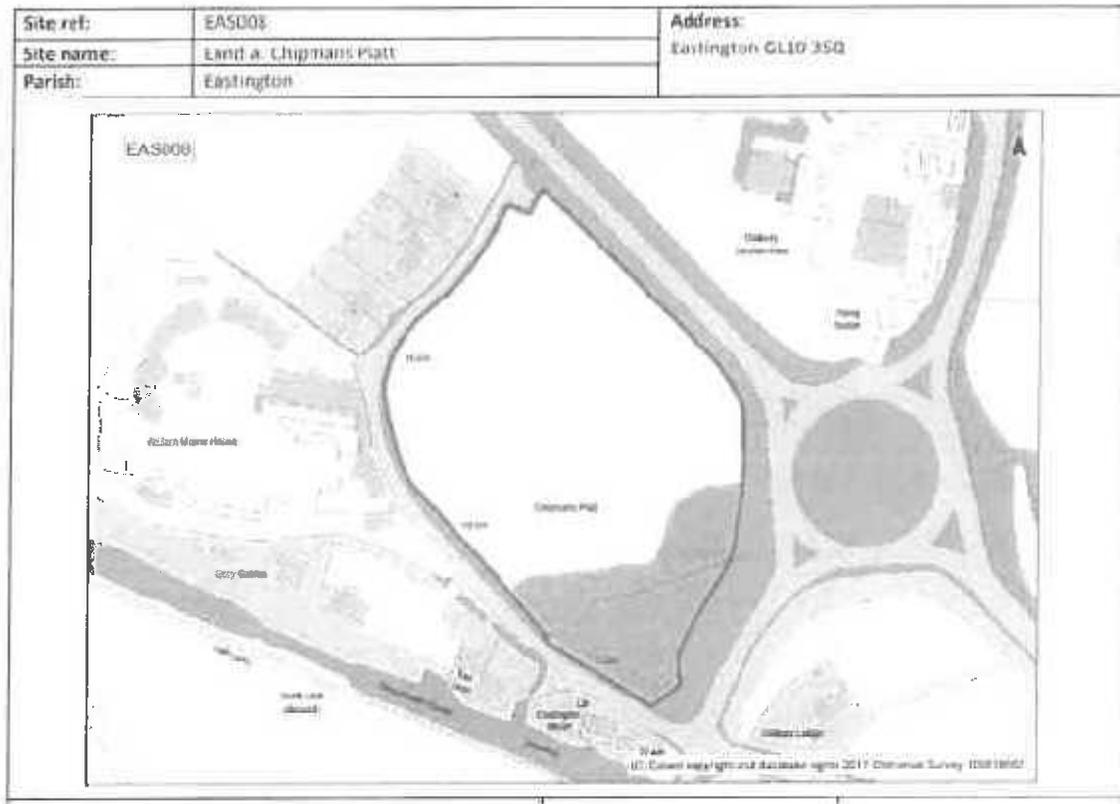
[Redacted name]

REGIONAL DIRECTOR

Email: [Redacted email address]

Enc.

Appendix 1 -Site Plan Chipmans Platt



Source: Stroud Strategic Assessment of Land Availability (2017) Appendix 3 p. 47