

1. Introduction

1.1. It appears that the justification for the possible amendments to the recently approved Local Plan (2019) is the Government's late adjustment to regional housing targets together with proposed amendments to the planning system that reduce involvement of the local community in the decision making process.

1.2 It is noted that the Government reliance on a revision to its computer based algorithm, without taking fully into account the constraints on development already firmly imposed by the Government's own Cotswold AONB policies, gives rise to a basic conflict. The resulting confusion, with pressure for more development, now proposed within an area where development is otherwise carefully constrained to protect a national landscape, has already been highlighted in the national press as a major concern.

1.3 The Parish Council therefore asks that SDC, in conjunction with neighbouring Cotswold AONB authorities (Cotswold & Cheltenham), challenges the 'algorithm' process with whatever means appropriate, with a view to achieving a substantial reduction in the overall target figure.

1.4 In addition the Parish Council asks that the District Council also resists Government proposals to remove the opportunity for local public involvement in planning decisions at the detailed stage. The Parish Council is firmly of the view that a local input into the detailed design and disposition of development (that has already been agreed in principle), is a vitally important way of ensuring the protection of local character

2. Local Plan Questionnaire

2.1 The consultation document suggests a range of strategies and spatial options and seeks views on which might be the most appropriate way forward, assuming that the revised government targets have to be adopted.

2.2 The Parish Council is responding to this request for feedback as best it can, but with the anticipation that the overall target figures will be reduced (see 1.3 above) thereby relieving the pressure for new homes in sensitive locations such as in and around the Cotswold AONB

3. Spatial Options

3.1 Four Options are suggested with the proviso that combinations or 'hybrids' might also be considered. (- Options 1-4 extracted from consultation document . See Blue type below). Note that Upton St Leonards is classed as a 3b Settlement.

'Option A Intensify

Additional housing within the boundaries of sites already identified within the **Draft Local Plan**. Some of the sites may have potential to increase densities whilst delivering well designed places.'

Response

Whilst there may be potential for further intensification in some settlements this is not considered to be the case in Upton. The Parish has seen very considerable growth within its defined boundaries over the past 10 years (more than any other Parish in SDC) The Parish has actively played its role in providing for future housing needs.

Further growth will place undue pressure on existing infrastructure and facilities and risk damaging the settlements village character. Sites outside the agreed Local Plan boundaries can only be found by locating development within or adjacent to the AONB. In Upton the AONB is protecting the scarp edge, an extremely sensitive part of our Cotswold heritage. The village of Upton is well defined by an approved Local Plan boundary. Any expansion of this will risk the transformation of this Stroud village into a Gloucester suburb. A move that residents are most anxious to avoid.

'Option B Towns and Villages

Look for further housing sites at the smaller towns and larger villages in the District, thereby distributing a greater proportion of the housing required to **Tier 2** and **Tier 3** settlements.'

Response

See 'Option A' comments, above

'Option C Additional Growth Point

A new growth point, potentially located along one of the main movement corridors within the District (A38, A419, A4135), where most future transport improvements will be located.'

Response

If reserves are needed for further growth the Parish Council considers that this option provides the most appropriate opportunity. The suggested growth points along the transport corridors, provided by the A38 in particular, appear to provide an option that is well separated from AONB considerations. However the Parish Council draws attention to the proximity of the M5 to the sites at Whitminster (PGP1) and at Hardwick and Moreton Valance (PGP2) .Effectively this may mean that a part of these sites, close to the Motorway, will need to be deleted if motorway generated pollution is to be avoided . This recommendation comes from a community struggling with these problems in an area where the M5 runs close to existing housing. The Parish Council notes that surprisingly, the Consultant's Sustainability Report makes no reference to these issues when evaluating the sites potential. A considerable oversight.

‘Option D Wider dispersal

Identify a range of additional housing sites, not just at **Tier 2** and **Tier 3** settlements, but extending to small sites at **Tier 4** villages’

The Parish Council would not consider this to be an appropriate option. It would encourage dispersal of development within the Cotswold AONB and at and adjacent to conservation areas that are an essential part of the Cotswold heritage.. This approach should be strongly resisted.

Conclusion

Upton St Leonards Parish Council recommends that if additional and substantial growth requirements have to be accommodated, then carefully selected ‘Additional Growth Points- as suggested in Option C’ would be supported. Whilst the sites proposed in the A38 corridor appear to have potential for the reasons set out, the constraint posed by M5 generated air and noise pollution should also be taken into account