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BY EMAIL

██████████ Planning Strategy Team
Local Plan Consultation
The Planning Strategy Team
Stroud District Council
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11 December 2020

Dear ██████████ the Planning Strategy Team,

Stroud District Local Plan Review – Additional Housing Options Focused Consultation - Further Millfields Housing Development Phases at North-East Cam

I refer to the above and I write to you on behalf of Bathurst Ltd which, as you will be aware, has promoted and is successfully delivering the Millfields strategic urban extension at North-East Cam (strategic allocation SA3 in the adopted Stroud Local Plan). I also refer to our previous submissions promoting additional housing numbers and further phases at Millfields and, specifically, our letter to Mark dated 15 June 2018 and our Revised Local Plan representations (and enclosures) dated 16 January 2020.

We welcome the opportunity to respond to the Additional Housing Options focused consultation document issued in October 2020. We have read and carefully considered the additional housing options consultation document, which explains that the Council may have to find land for an additional 1,050 – 2,400 homes in the Plan period to 2040.

In terms of the spatial options, we support a hybrid approach of intensifying the use of existing and allocated sites (Option A) and promoting more growth within larger villages (Option B). We do not consider that the scale of the additional housing requirement is so great that it justifies an additional growth point

(Option C), or an approach of 'wider dispersal' (Option D). These options (C and D) would be unsustainable and would have negative environmental consequences; they would also represent a major departure from the established growth strategy for the district.

With specific regard to Millfields we have set out in our previous submissions the significant scope for further housing delivery phases at Millfields. We have also set out the compelling sustainability case for looking to the existing SA3 strategic allocation, and its considerable infrastructure investment, to maximise (not limit) its contribution to sustainable growth. We have also argued (see the 16 January 2020 submission) that the Millfields additional phases are infinitely more sustainable and deliverable than any part of the PS24 site and, in particular, its more northerly fields (towards the M5).

Whilst the Draft Revised Local Plan does allow for some additional Millfields development, it limits it to just 180 units on parts of the land parcels known as Phases H7 and H8. We have challenged this and maintained that significantly higher numbers could be achieved. We have also made the case that more homes can be delivered within the existing SA 3 boundary and this is demonstrated by the live Planning application (Ref S.20/1116/OUT) for Phase H6, which will increase the delivery of new homes by 56 units.

To further support that case for greater development on Phases H7 and H8 we have now prepared two masterplans, which are enclosed with this letter.

The first (plan ref ALIN12) is a high level masterplan showing the Millfields 'bigger picture'. It shows how these additional phases can be seamlessly integrated into the existing approved masterplan development. It also shows the potential for an additional road link (within the SA3 consented area) to improve connectivity and facilitate a new public transport route.

The second (plan ref ALIN16) shows a more detailed high level masterplan. This demonstrates the close proximity and linkages (existing and future) to the district centre, which will lead to a highly sustainable development. It also shows how the Phases H7 and H8 will integrate with the consented Millfields development and continue the strategic landscaped belt along the eastern development boundary.

These submissions provide compelling evidence that these sites can, using quite conservative density assumptions, deliver substantially greater dwelling numbers than currently envisaged in the Draft Revised Local Plan (November 2019).

Phase H6, within the SA3 consented area, can deliver an additional 56 units. Phases H7 and H8 can deliver at least 315 units, i.e. 135 more than indicated in the Draft Plan. Taken together, these sites will deliver at least an extra 191 new homes. That represents over 18% of the lower end of the current shortfall, and about 8% of the higher end of the range.

There are compelling sustainability reasons to support these proposals which are uncontentious, soundly based and with low environmental impact. Indeed, Bathurst Ltd submits that the Additional Housing Options focused consultation, represents a resounding confirmation of the soundly based Planning case it has been making for several years on these matters.

In the light of the above, Bathurst Ltd requests that the Council embraces the opportunity to expand the planned delivery through the Millfields strategic urban extension to meet identified housing requirements. Bathurst Ltd specifically requests that:

- 1. A policy should be introduced to update the 2015 SA3 allocation. This should include a direct reference to Phase H6 (56 dwellings) and update the SA3 allocation unit numbers to 506 dwellings. The policy should include a list of criteria to be applied to the H6 development, including affordable housing and strategic landscaping requirements.**
- 2. Draft Plan allocation PS25 should be extended to include Phases H7 and H8 shown on the attached plan with a combined housing unit number of 315. The associated policies should include specific criteria for this allocation, including affordable housing, strategic landscaping and strategic pedestrian / cycling links and connections.**

We trust that you will consider these submissions and respond positively. If you require any further information or wish to discuss these proposals further, please do not hesitate to contact me.

Yours sincerely,

P. Staddon

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Enclosures

Masterplan ALIN12

Masterplan ALIN16