

Ref: Stroud Emerging Strategy Paper- Stroud District Local Plan Review

Via email only

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

18 January 2019
KF Ref: TS/1042

Dear Sir/Madam

**Stroud District Local Plan Review: Emerging Strategy Paper
Representations on behalf of Mactaggart and Mickel**

These representations have been prepared by Knight Frank on behalf of our client, Mactaggart and Mickel, in relation to the Stroud District Local Plan Review: Emerging Strategy Paper, which closes on Friday 18 January 2019.

Our client has an interest in the land and is promoting the site: land at Lower Knapp Farm, Cam, on behalf of the landowners. Representations have previously been made to the initial Issues and Options public consultation and previous SALA exercise in respect to site reference CAM010- Lower Knapp Farm, Cam (site location enc.)

Site Context

The site comprises of approximately 20 hectares of Greenfield land located to the north-west of the settlement boundary of Dursley. There are few physical constraints on the site. The Environmental Agency identifies the site as being located within Flood Zone 1, with the least probability of flooding. No statutory or locally listed buildings and/or monuments are located in close proximity to the site. There are a number of locations for potential access along Elstub lane and Woodend Lane.

The site is located in a very sustainable location. The land is ideally located for residential development with a range of services and facilities within close proximity. The site is well served by public transport. The nearest bus stop is located within easy walking distance (350m) of the site. This provides high frequency connections to Dursley town centre, Woodmancote, Thornbury and Stroud. To add to this, Cam and Dursley train station is just 1.2 miles from the site.

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Stroud District Local Plan Review: Emerging Strategy Paper

These representations have been prepared in response to the Emerging Strategy Paper public consultation. We provide our response to the document in the subsequent sections below, principally structured around the questions asked.

Question 1.0a: Have we identified the top 5 issues for you?

No. As set out in representations submitted by Colliers International on behalf of Mactaggart and Mickel for the Lower Knapp Farm site to the Issues and Options Consultation, our clients top five issues are:

1. Meeting the District's identified future housing needs;
2. Tackling the acute lack of affordable housing in the District;
3. Ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development;
4. Developing a Green Infrastructure network of public open space provision throughout the District, to increase accessibility, ensuring public open spaces are adaptable and capable of accommodating multiple uses;
5. Achieving mixed, balanced, and cohesive communities offering a sense of community identity and belonging.

The proposed top five issues include issues 2, 3, and 4 above. However, it is considered that not including meeting the District's identified housing need as a top issue is a mistake as this should be a key goal of any Local Plan. In addition, it is considered that the highlighting of preventing developments impact on the natural countryside is counterproductive to the other key issues identified, particularly as not all areas of the District will have high levels of brownfield land and development on Greenfield may be necessary to meet housing needs and to effectively contribute to affordable housing supply. Our client believes that focus should be instead on creating sustainable development with balanced and cohesive communities in the most appropriate places.

Question 1.0b: Do you agree with the ways we intend to tackle these issues?

Issue 1: yes. It is vital that new housing development is located in the right places to ensure that sustainable development is achieved. It is considered that First Tier settlements are the most appropriate areas to focus this development, with larger-scale housing developments having the best change of improving existing access and infrastructure, as well as providing mixed, balanced, and cohesive communities through careful master planning. Ad hoc development of small housing sites is less likely to achieve this.

Issue 2: Yes, though we wish to note that master planned sites are more likely to provide cohesive and useable green infrastructure that truly benefits the locality.

Issue 3: It is agreed that priority should be given to re-development of brownfield sites, however this should not prejudice sustainable development in other locations.

Issue 4: Yes.

Issue 5: No. As set out in the response to the Issues and Options consultation, affordable housing is best delivered on larger sites through a policy requirement for provision of a percentage of affordable homes to be delivered, such as the 30% requirement in the Stroud Local Plan 2015. The proposed methods of tackling affordable housing supply are necessary and should be encouraged, though it is considered that small-scale affordable housing sites fail to create balanced and cohesive communities. The emerging Strategy should also ensure affordable housing delivery through larger sites.

Question 2.3a: Do you agree with the ways in which the emerging strategy intends to meet local housing need?

Yes.

Question 2.3b: Do you support an alternative approach? Or have we missed anything?

No.

Question 3.2a: Do you agree with the Strategic objectives as drafted?

Yes, though please see response to Question 3.2b below.

Question 3.2b: Do you support an alternative approach? Or have we missed anything?

It is considered that an additional strategic objective should be included under the heading of 'Homes and Communities' setting out a strategic objective of meeting housing need - both market and affordable - in order to demonstrate Stroud District's commitment to providing a sufficient supply of homes to meet the objectively assessed housing need. It is considered that without this strategic objective, SO1 and SO1a are unlikely to be achieved.

Question 4.2a: Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

We support the approach of continuing to concentrate housing and employment development at large sites located at the main towns in the district, as this is considered the most sustainable form of development. Housing development should logically be located where employment opportunities are high to promote sustainable transport and support the local economy. Additionally, larger housing sites generally deliver higher amounts of affordable housing than smaller sites of fewer than 10 dwellings.

Question 4.2b: Do you support an alternative strategy approach?

No.

Question 4.2c: Have we identified the right towns and villages for growth? Or do other settlements have growth potential?

Yes, the identified towns and villages are the most appropriate for growth. In particular, the continued designation of Cam as a Tier 1 Settlement is supported.

Question 4.2d: Do you support our approach to addressing Gloucester's housing needs?

Yes.

Question 4.3a: Are any of the settlements in the wrong tier, and if so, for what reason?

No. It is considered that all settlements are correctly identified, in particular Cam and Dursley are correctly identified as Tier 1 settlements.

Question 4.4a: Do you support the emerging Strategy's approach towards maintaining settlement development limits?

It is acknowledged that a hybrid approach is proposed, essentially combining Options 1 and 2 from the Issues and Options consultation paper. This is supported, however further emphasis on the scope for development outside of development boundaries is considered most appropriate. The reasons for this are set out below.

Question 4.4b: Or do you support an alternative approach?

Whilst it is accepted that settlement boundaries are a useful tool for controlling isolated development in the countryside, it is considered that restricting development to only those sites within restrictive boundaries prevents the potential for sustainable development that has the potential to form a positive net impact on the community. The National Planning Policy Framework does not in itself mention 'settlement boundaries', instead dictating that isolated homes in the countryside should be avoided. In addition, paragraph 72 of the NPPF sets out that the supply of new homes is often best achieved for planning for larger scale developments, including planning for significant extensions to existing villages and towns.

The extension of settlement boundaries is supported, however it is considered that the small alterations proposed are not sufficient. In particular, at Cam and Dursley, the minor amendments to the settlement boundary to accommodate sites SDL-CAM01 and SDL-DUR01 are considered contrary to the overall growth strategy of concentrating housing growth at the main towns of Cam and Dursley, Stonehouse, and Stroud.

We believe that a hybrid approach is the right option, particularly to avoid inappropriate development in the countryside. However, the hybrid approach we support is one that provides more scope for development outside of settlement boundaries in sustainable locations, as opposed to only limited development. It is not clear in the Emerging Strategy Paper what the Council considers to be limited development, and this should be clarified if it is to be retained.

Question 4.4c: Do you support the proposals to allow some limited development beyond settlement development limits?

Yes, however as set out above it is considered that this should be extended to larger scale development as opposed to 'limited development'.

Question 4.4e: Do you support the specific changes to existing settlement development limits that are set out in Appendix A?

As set out above, the proposed amendments to the settlement boundaries at Cam and Dursley are supported in principle, but we believe should be extended further than the limited adjustments proposed if the restriction on development outside of settlement boundaries is retained as proposed for only 'limited development'.

Question 5.0a: Do you support the proposed mini-visions for your area?

Yes. Cam & Dursley represent a settlement with strong potential for future growth, and the proposed mini-vision supports this.

Question 5.1a: Assuming growth is desirable, have we identified the best sites(s) at each town and village?

No. The emerging strategy sets out the preferred growth area for Cam as the north and northeast of the settlement, forming sites PS22 – 25, and SA3. It is considered that the area to the west/north west of the settlement represents a sustainable growth location.

The site identified in the 2017 SALA process as CAM010 (Lower Knapp Farm) is considered a more suitable site for development of the settlement. However, the site was rejected under the SALA. The reasons for rejection given were:

“The site is not suitable for development because of the likely high landscape impact, highly visible as part of the escarpment foot slopes, helping to separate Cam from the M5 and fulfilling a recreational role on the edge of the settlement. There are therefore potential impacts preventing sustainable development in this location”

Development at Lower Knapp Farm would be of a magnitude that would provide a community with a diverse range of residents due to a sound mix of type, tenure, and size of housing. The integration of affordable housing units onto the site would encourage social cohesion.

Cam benefits from a GP surgery and pharmacy, situated near to the historic high street in the north of Cam. The medical centre is only 500m from the edge of the site. Additionally, Cam already benefits from a good range of leisure facilities including a sports club, cricket pitch, and a number of public open spaces and play areas. The CAM010 site is approximately an 8 minute walk from the Jubilee playing field and athletics track, and would incorporate on-site provision for informal public open space, including the potential for a children’s play area on-site. The provision of these recreational facilities on-site negates the potential for loss of the recreational role set out in the rejection reason above.

The site is also well-located in terms of bus travel times/distance to a market town, supermarket, post office, community centre, primary retail, primary school and sixth form school. There is potential for a bus link to be incorporated into or near to the development which would enable easier access to these facilities, as well as the marginally further afield minor injuries unit and leisure facility.

The potential for landscape impact was one of the key reasons for being discounted during the SALA process. It is recognised that the site sits within the ‘Rolling Hills and Valleys’ Landscape Type and that the upper levels of the site play a strong visual and landscape role given the topography. In contrast, the lower lying areas are visually well contained.

Any development to be brought forward on the site would recognise and respond to the landscape, with housing development being kept to parcels of land at low levels with limited landscape impact. The development would also include structured planting along the upper edges to enhance the site’s ecological value and create a more treed character complementary to that found in the landscape around and to the north and east of Cam.

As set out above, due to the constraints of landscape character at the higher levels of the site, development would be kept to the lower lying areas close to the existing urban edge of Cam. Development on the site would provide pedestrian and cycle routes to connect the development to the local area, in particular to the primary school south west of the site.

A Vision Document for the site was prepared in 2011. In preparation for the production of this, a Transport Appraisal was carried out on the basis of two separate development parcels. Gloucestershire County Council was consulted on vehicular access. The proposals presented to the Council consisted of an improved Woodend Lane with site access to the northern area of the site, and improvements to Elstub Lane for access to the southern area of the site. GCC indicated that the proposals were acceptable in principle. Detailed transport assessments would be undertaken prior to any development and reasonable mitigation would take place.

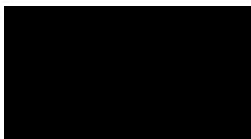
In light of the above, it is considered that the CAM010 site has the potential to deliver a more sustainable extension to the existing urban area of Cam in comparison to the proposed urban extension to the north. Therefore, it is not considered that the most appropriate sites have been identified in the Local Plan, and these should be reviewed. The CAM010 site, known as Lower Knapp Farm, is a sustainable development location and should be considered as an excellent site for allocation in the forthcoming Plan.

Conclusion

In summary, these representations have demonstrated that the land at Lower Knapp Farm, Cam is available now and in a suitable location for residential development. Although the site was discounted during the SALA process due to its potential impact on the landscape, any development would recognise and respond to the landscape with housing development being kept to parcels of land at low levels with limited landscape impact. The development would also include structured planting along the upper edges to enhance the site's ecological value and create a more treed character complementary to that found in the landscape around and to the north and east of Cam.

If further information regarding the site is required, please do not hesitate to contact me.

Yours faithfully,



Partner

Enc. Site Location Plan