

Date: 18 July 2021
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Dear Sir or Madam,

**Representation for the Stroud District Local Plan Review (Regulation 19) (SDLPR)
Land adjoining the southern boundary of Fieldway, Upton St Leonards**

This representation has been put forward to illustrate why proposed housing allocations should be considered in Upton St Leonards, why policies DHC2 and HC3 need to be altered and why the above site should be considered for a residential allocation in the upcoming Submission Plan to the planning inspectorate.

This representation should supersede any previous representations made on this land, however, should be read in conjunction with the additional housing consultation representation, submitted in December 2020 (see enclosed).

Stroud Local Plan Review - Settlement Hierarchy

Upton St Leonards is classified as a tier 3b settlement in the Draft SDC Publication. Tier 3b settlements are known to be less accessible and have a more basic level of facilities than tier 3a settlements.

Tier 3b, 4 and 5 settlements do not propose to allocate housing growth over the next plan period, in contrast to tier 3a settlements which propose to allocate a total of 3,995 dwellings.

The Stroud District Settlement Role and Function Study Update 2018 - May 2019, contains information which has been used to determine the Draft Plan's settlement hierarchy. Each settlement has been analysed based on its ease of access to key services and facilities and the relative levels of community services and facilities which are available.

This latest study provides an update to findings set out in the previous 2014 study, which was reviewed in the prior representation made to the Preferred Options Report.

Paragraph 2.10 of the report sets out that Upton St Leonards has received a particularly low proportionate housing growth, in comparison with other settlements in the district that have an average growth of 6% between 2011 and 2018. It is somewhat confusing why this is the case

because, as set out in the housing accessibility section (table 3), Upton St Leonards is identified as one of the most affordable settlements in the district, where the average housing price is £283,990 in comparison to Gloucestershire's average at £298,441.

The settlement study looks at each settlement's accessibility to other services by both car, bus and walking times. Settlements with poorer accessibility to facilities are scored in ascending numbers.

Findings indicate that Upton St Leonards is rated 'fair'. Table 6: (Ease of access to key services - 2016) Upton St Leonards has an equal accessibility score (5) to Minchinhampton that is equal to Chalford and Hardwicke which are both considered tier 3a settlements. Kings Stanley (Kerton) which are both tier 3a settlements have lesser accessibility to facilities, scoring a 6, and Whitminster which is also a tier 3a settlement is considered to have even poorer accessibility to facilities, scoring an 8.

It should be considered that Upton St Leonards has equal or better accessibility to facilities over 7 other settlements, which are all tier 2 and 3a settlements where housing growth is focused.

The settlement study goes onto assess each settlement's relative levels of community services and facilities (including: healthcare, education financial, recreation and transport etc). Settlements with greater services and facilities are scored in ascending numbers. Table 5, sets out that Upton St Leonard has an overall local provision score of 8, similar to tier 3a settlements; Kings Stanley, Brimscombe, Chalford, Kingswood and Newtown and Sharpness.

It should be considered that Upton St Leonards is scored better than Hardwicke, North Woodchester and Leonard Stanley which are all tier 3a settlement with 7 facilities, and also better than Whitminster that has 6 facilities and Thrupp that has 3, which are also tier 3a settlements.

It should be noted that Upton St Leonards has an equal or better provision of community services and facilities than 10 settlements that are all considered tier 3a settlements.

On a separate note Newtown & Sharpness have been selected to allocate circa 69% (2,770 dwellings) of all proposed growth located in tier 3a settlements.

It is questionable whether Newtown & Sharpness will be able to deliver the proposed housing growth over the plan period, due to potential slow delivery and build rates which could result in a deficit for Stroud's future housing supply. This allocation should be distributed more evenly to areas which have good access to strategic and local facilities such as Upton St Leonards.

When considering the above information, it can be seen that the settlement hierarchy set out in the Draft Plan (pg. 50) is not sound and that Upton St Leonards should be promoted higher in the settlement hierarchy to at least a tier 3a settlement.

SDC Draft Plan – New Policy DHC2 Sustainable Rural Communities

This proposed policy sets out that, *“in order to maintain the social sustainability of smaller rural settlements, small housing schemes of up to 9 dwellings will be supported outside settlement development limits at designated tier 4 and no tier 3b settlements, providing all of the following criteria are met:*

1. the proposed housing will consist of types, tenures and sizes that seek to address existing demographic imbalances in the local population and/or specific housing needs identified in a parish

2. the proposal would not exceed settlement development limits or would fill in an otherwise built up frontage close to the settlement boundary in a manner that would be in accordance with the settlement character and landscape setting of the settlement;

3. the proposal is included within a Neighbourhood Development Plan or is supported by the relevant parish council;

4. the proposal would not lead to a cumulative increase of more than 10% of the settlement housing stock at 2020;

5. the proposal satisfies the detailed criteria defined for meeting housing need at settlements”.

We welcome the inclusion of proposed policy DHC2 and acknowledge that SDC have extended the policy to cover Tier 3b settlements since concerns raised throughout the Draft Plan consultation.

We still have slight reservations that this policy might lead to piecemeal development, meaning that settlement boundaries will continually be adjusted to facilitate unrestricted minor development. While we support the principle of this policy, we would prefer to see the promotion of some (including Upton St. Leonards) Tier 3b to Tier 3a settlements.

Suitability of land adjoining the southern boundary of Fieldway, Upton St Leonards

The above land set out in the supporting location plan, is in a sustainable location because it is located on the outskirts of Upton St Leonards which forms part of an urban extension to Gloucester. The site is located circa 3.5 miles from junction 11a of the M5 motorway and has access to numerous facilities in the village and Gloucester’s wider area.


It should be considered that Upton St Leonard's future growth is somewhat restricted, because as noted in the 2017 SALA, its principal physical constraints are; the floodplain to the south west and north east, the proximity to the M5 to the west, and the Cotswold AONB which adjoins the settlement to the south and east.

The latest Landscape Sensitivity Assessment sets out that Upton St Leonard's preferred direction for housing growth in landscape terms is to the south east to improve the settlement edge so that it becomes better screened and less indented. The future development of SALA sites UPT002, UPT003 and UPT004 along with the subject site (UPT012) will round off the built form of the village.

A desktop appraisal of significant issues on and around the site has been undertaken to inform this representation:

Heritage

The nearest heritage asset is Teckels Cottage (1154997) which is Grade II listed and is located circa 125 metres from the site's boundary to the south. It is separated by a field and allotment and there is a satisfactory buffer in place to ensure that the site's development will not adversely impact the

 in any sensitive landscape designations apart from being located in the open countryside. Its development along with SALA sites UPT002, UPT003 AND UPT004 could help round off existing development.

Ecology

The majority of the site is in agricultural/equestrian use with limited if any ecological benefit. The ecological benefit of the site is likely to relate to the boundary features of the site which will be retained and improved upon by planting additional trees in any future development.

Access

Access to the site is gained via a gated entrance from The Stanley which has good visibility in both directions. A public footpath referred to as Upton St Leonards footpath 36 runs to east of the site. This footpath is outside the site's boundary and will not need diverting.

Drainage

Environment Agency Flood Risk mapping for land-use planning indicates that the majority of the site is located in flood zone 1. This indicates that the overall site has a low probability of flooding (less than 1 in 1,000 annual probability of river flooding) and can be developed.

A small section to the east of the site is located in flood zone 2, and this area which measures circa 0.25 hectares is not proposed to be developed and will be used as open space for future residents.

Affordable Housing

The adopted Stroud Local Plan sets out that there is a shortfall of affordable dwellings and that an additional 446 per annum are required.

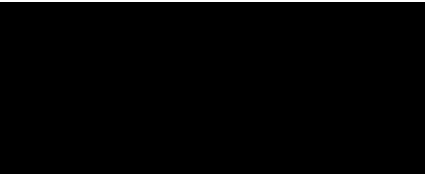
Summary

In considering the above, there would appear to be no overriding physical constraints or potential impacts preventing sensitively located development for a small to medium scale residential scheme.

Bruton Knowles would like to express that the site is under single ownership and that it is immediately available and deliverable over the next 5 years. For these reasons the site would make an appropriate residential allocation for either open market or self-build units.

Should you have any queries please let me know.

Yours sincerely



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