

Ref: Stroud District Local Plan Review: Emerging Strategy Paper

**Via email only**

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

18 January 2019  
KF Ref – TS/0015

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 Hawpark Farm, Wotton Road, Wotton-Under-Edge, on behalf of the landowners. Representations have not previously been submitted promoting the site to the initial Issues and Options public consultation which took place during autumn 2017. However, we request the site is now considered and assessed as part of the on-going Call for Sites exercise and Local Plan Review.

**Site Context**

The site comprises approximately 19ha of agricultural land located to the east of Wotton Road and is situated between Wotton-under Edge and Kingswood opposite Katharine Lady Berkeley's School, within the administrative area of Stroud District Council.

The site comprises undeveloped (greenfield land) that contains no Development Plan allocations or statutory designations in the Stroud Development Plan. The site is located outside of the defined settlement boundary, approximately 500m from a Site of Special Scientific Interest (SSSI) and lies immediately adjacent to the Cotswold Area of Outstanding Natural Beauty (AONB).

The site is within Flood Risk Zone 1 (low risk) and its topography is relatively level. It contains no statutory or locally listed buildings or scheduled ancient monuments. The closest heritage asset is located to the south of the site and comprises Kingswood House (Grade II, ref: 1088853).

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Wotton Road runs alongside the north western boundary of the site and is the primary route linking it to Wotton-under-Edge to the north and Kingswood to the south. The site is well served by public transport with bus stops located on Wotton Road adjacent to Katharine Lady Berkeley's School which provides access to the following bus routes: 60, 85, 288, 626, S8 and S8A. These bus routes provide regular services to locations such as Thornbury, Wotton-under-Edge, Yate and Charfield.

A Site Location Plan is enclosed.

### **Potential Use**

Given the site's context as set out above, we consider the site is able to assist Stroud District Council in meeting any unmet or additional housing needs. This is particularly pertinent given the requirement for a review of the Local Plan. Given its size and context, the site could make a significant contribution towards the Local Plan Review's housing target.

### **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

Whilst we agree in principle with the five key issues set out within the Emerging Strategy Paper, however, we consider the principal key goal of any Local Plan should be to meet the District's identified future housing needs.

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 suitable, appropriate greenfield sites may be necessary to meet housing needs and to effectively contribute to affordable housing supply in the most sustainable way. On this basis, we consider the focus should instead be on creating sustainable development with balanced and cohesive communities in the most appropriate places.

#### Question 1.0b

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 and Second Tier settlements are the most appropriate areas to focus this development, with larger-scale housing developments having the best chance 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, including suitable and appropriate greenfield sites that are well located.

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.

We also consider the strategy should be amended and updated to reflect the new NPPF definition of affordable housing. A number of additional affordable housing tenures that are acceptable now include: affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership. All of which can make a significant impact in helping meet the affordable housing requirements of the District.

#### Question 3.1a

We consider the document's vision for 2040 is adequate, however, it is not worded in an aspirational or forward facing manner. The District's vision should aspire to become a key destination in the region where people want to (and can) work, live and enjoy. The vision also needs to recognise, and make aspirations to accommodate, new homes and jobs in the right places. The current vision as drafted fails to do this.

#### Question 3.1b

Please see our response to Question 3.1a.

#### Question 3.2a

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

#### Question 3.2b

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

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.

However, we consider there is merit in adopting an element of Strategic Growth 'Option 2' which seeks to take a slightly more dispersed approach with some medium-sized housing and employment sites on the edge of larger villages, as well as the main towns. We note that the Transport Assessment undertaken to support the preparation of the Local Plan Review concluded that whilst Option 1 was the most sustainable, Option 2 was also 'highly sustainable' in terms of the location of planned growth and existing levels of non car based trips.

#### Question 4.2b

As per our response to Question 4.2a, we consider the strategic approach is largely appropriate, but should not prejudice the development of suitable, sustainable sites delivering some medium-sized housing on the edge of larger villages as well as the main towns.

#### Question 4.2c

Yes, the identified towns and villages are appropriate for growth. However, we ask that Wotton-under-Edge, and the adjacent land around the existing settlement is assessed for its development potential. As set out above, we consider the site at Hawpark Farm given its size and context would provide an excellent opportunity for a medium-sized housing allocation.

#### Question 4.2d

Yes.

#### Question 4.3a

We consider that all settlements are correctly identified, including Wotton-under-Edge as a Tier 2 settlement given its scale, character and location. As the document states, we consider Wotton-under-Edge can play a strategic role in terms of providing housing, services and facilities that serve a district-wide or wider-than-local catchment.

#### Question 4.4a

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

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. 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

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

As set out above, the proposed amendments to the settlement boundaries 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

We broadly agree with the mini vision set out for the Wotton Cluster. However, we consider the area should be identified as having the potential for providing an appropriate number of new homes and affordable homes which is currently omitted from the draft mini vision.

#### Question 5.0b

Please see our response to Question 5.0a.

#### Question 5.1a

As set out above, we wish to propose the inclusion of the site at Hawpark Farm for residential use within the Wotton-under-Edge. At present, the site is not identified as a potential site or alternative site for development. However, given its characteristics and location, we consider it to be an appropriate site that could make a significant contribution to the areas identified housing needs.

The location of the site between Kingswood and Wotton-Under Edge presents an opportunity to provide housing in a way that does not immediately cause harm to either of the two settlements, both of which are constrained and have seen moderate levels of growth in recent years. The site is relatively unconstrained and is well-positioned to access Katherine Lady Berkeley School along with other local services in the two neighbouring settlements.

These representations are supported by a Call for sites: Site Submission Form for the site at Hawpark Farm.

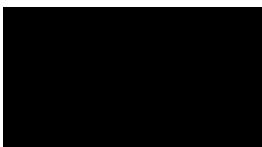
#### **Conclusion**

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 Consultation. Our client is the owner of land at Hawpark Farm, south of Wotton-under-Edge. These representations have provided responses to the relevant questions set out within the Emerging Strategy document.

In addition, these representations have demonstrated that the land at Hawpark Farm is available now and in a suitable location for residential development. As set out above, the site is not subject to any significant constraints that would prevent development coming forward. Furthermore, we consider the site should be assessed for inclusion as a site allocation within the Wotton Cluster, and would make a significant contribution towards meeting the strategic housing target for the District and should therefore be considered further for allocation.

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

Yours faithfully,



**Partner**

Enc. Site Location Plan