

## Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="√"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="√"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Stonehouse Cluster**

Pegasus supports the identification of Stonehouse as a Tier 1 settlement in the Pre- Submission Plan. It is a sustainable and suitable Tier 1 settlement location at which housing needs can be met. The ‘very important employment role’ of Stonehouse to the Stroud economy is acknowledged with its sustainable transport linkages to Stroud, Swindon, Gloucester and beyond via the railway network. As a settlement with excellent access to both sustainable transport infrastructure and the strategic road network, situated at junction 13 of the M5, the Tier 1 settlement is well placed to enable the District to meet its economic growth objectives.

### Land south of Bristol Road, Stonehouse.

Pegasus consider that STO 006 Land South of Bristol Road should be considered for development purposes in the emerging SLPR. The site is situated adjacent to the main A419, it was considered in the SALA 2017 as site (STO 006) 'Land South of Bristol Road', a site plan is included in Appendix x, together with a Heritage Assessment.

#### **APPENDIX 1 LAND SOUTH OF BRISTOL ROAD, STONEHOUSE (INCLUDING INDICATIVE PLANS AND A HERITAGE ASSESSMENT)**

The SALA concluded that:

***“Development of housing or employment should be small scale and there would need to be green gaps retained to allow views towards the canal corridor and to emphasise the physical separation between the historic mills. In terms of housing, this site could be part developed for medium density development typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of about 30 dph, and the suggested yield is 70 units.”***

The Assessment acknowledged that there are no known physical constraints preventing development of this land and that it is accessible with good access to local facilities and services.

The site is located on land immediately adjacent to the built-up area of Stonehouse. The town forms part of the Stroud Urban Area along with the settlements of Stroud, Thrupp and Brimscombe, North and South Woodchester and Nailsworth and lies approximately 4km to the west of Stroud Town centre. The site is itself is located on the south western edge of Stonehouse approximately 0.8km from the town centre. It lies to the south of the A419 Bristol Road which acts as key arterial route linking Stroud to the M5 motorway. The site is a flat arable field on the southern side of the A419, Bristol Road.

From the adopted Local Plan Proposals Map it can be seen that the site is located immediately adjacent to, but outside of the defined settlement boundary. The site is however enclosed by existing development on three sides with residential and large scale industrial development to the north, modern Industrial and business units to the west and a commercial training centre and established areas of residential development beyond a railway embankment to the east. To the south beyond a line of trees is the Stroudwater Canal, which separates the site from the open countryside beyond.

The site is situated immediately opposite the residential area of Avenue Terrace and the industrial area of Stonehouse Commercial Centre both on the northern side of the main road. The site consists of a roughly rectangular parcel of land contained by the Stroudwater Canal to the south with Bonds Mill to the west and the elevated railway to the east. The site comprises 4.5ha of which 2.12ha is considered developable.

The Landscape Sensitivity Assessment (December 2016) has identified this site ST13 as:

***“Medium sensitivity to housing uses and Medium sensitivity to employment uses. Housing or employment south of the road would remove the openness of the area, and therefore the green gap, and would therefore reinforce the ribbon development character of the A419. It would also, potentially, adversely affect the setting of the canal. If housing or employment is considered, it should strictly follow the Conservation Area policies and guidelines and***

***strong green gaps should be retained which allow views towards the canal corridor. It would however be very important that it addresses both the Bristol Road and canal edges in an appropriate way as well as providing gaps in the frontage.***

The Heritage Impact Appraisal (May 2017) identifies that there are “significant constraints” although the site itself has no structures of historic interest, it lies within the IHCA and contributes to the setting of the conservation areas character.

In support of the site a Heritage Assessment was prepared by Pegasus in August 2019 and submitted to the Council.

The Assessment concluded at paragraph 7.1 of the report that:

***“The site is considered to make only a minor contribution to the character and appearance of the IHCA; derived from the site’s historic and aesthetic values, being historic agricultural land that is open space next to the Stroudwater Canal. However, its contribution has been diminished by the realignment and expansion of Bristol Road, and modern industrial and commercial development to the north and west, which have undermined the aesthetic and historic values of the site and, by extension, the IHCA. New built form within the site would not obstruct any key views within, towards or out from the IHCA. Overall, development of the site would be considered to cause minor less than substantial harm to the IHCA, at the low end of this spectrum of harm.”***

Appendix 5 has been prepared which provides indicative plans for residential or employment generating uses. It also includes a housing delivery programme.

In the Issues and Options consultation, the site was included in the area ‘STO A South of Bristol Road’ and identified as a broad location for development around the settlement of Stonehouse. Pegasus consider that the site should be included in the Local Plan review being well related to a Tier 1 settlement at Stonehouse with access to facilities and services and is therefore consistent with the settlement strategy. The site is available, suitable and achievable and could start to deliver housing on adoption of the plan, delivering a range and mix of open and affordable housing products in the early part of the plan period.

The LUC Sustainability Appraisal (SA) (2021) Appendix 5 of the SA provides a summary of SA findings for all site options considered at each stage of plan preparation and is presented in Table A5.1 to Table A5.6 in Appendix 5

Table A5.3 of the SA ‘Summary of scores for mixed use site options’ indicates that site STO006 was considered by the SA for mixed use purposes (despite being in Appendix 3 of the 2017 SHLAA as having potential for up to 70 dwellings). The site has been promoted through the Local Plan for residential purposes, not mixed-use purposes and has previously been the subject of an outline planning application for up to 90 dwellings including infrastructure, ancillary facilities, open space and landscaping and construction of new vehicular access from the A419 Bristol Road (S.13/1348/OUT). The application was refused on 19th December 2014 and a subsequent appeal was withdrawn in October 2015.

It is noted that in Appendix 1 of the previous SA (November 2019) that:

***“The site appraised through the SA report was considered for 90 dwellings as part of a mixed use development, as advised by the Council and reflective of the recent planning history of the site.”***

Appendix 8 of the previous SA (November 2019) page 713 states with regard to site STO006:

***“Emerging Strategy Paper Stage: The SALA identified that the site may have future potential for some development subject to resolving specific constraints and impacts. However, having considered the scale of growth appropriate for this settlement set out in the emerging strategy and the benefits and dis-benefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development. Draft Local Plan Stage: Having considered the scale of growth appropriate for this settlement set out in the Draft Plan and the benefits and disbenefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development.”***

This does not appear in the SA Appendix 8 (2021) there appears to be an error in the table as STO006 is not included, instead there is a reference to STO005 as land north of Bristol Road, Stonehouse (page 1002) but the reasons for the Council’s decision making do not relate to the site.

Pegasus object to the findings of the SA (2019) as the site was not promoted to the Council as a mixed-use allocation; it should have also been considered with other sites submitted to the Council for residential purposes at Stonehouse.

It is considered that a further medium sized residential site at Stonehouse will help ensure the delivery of new dwellings to meet housing need at the Tier 1 settlement in the first five years of the plan, complimenting the larger sites of PS19a and PS19b which will ensure a continued supply of housing for the remainder of the plan period.

Land to the south of Bristol Road, has the capacity to accommodate up to 90 dwellings or a mix of employment generating uses (up to around 10,000 sq m) in a sustainable and highly accessible location. It is in the control of an experienced developer and can be brought forward quickly delivering jobs, new homes or a combination of both. The site accords with the strategy and focus on Stonehouse.

#### APPENDIX 2 Land South East of Nupend

There are other sites which have been promoted: land south east of Nupend, Eastington (SALA ref EASO22) which is included in the SALA Assessment 2020 Appendix 3 Additional Sites with Future Potential. The site was promoted in the representations to the last consultation on the Draft Local Plan in our submission in January 2020.

The area edged red is 1.85 ha (4.6 acres). The site is an area of mainly brownfield land which could come forward for development as a modest extension to Nupend without compromising the separation from the strategic west of Stonehouse development. The site would benefit from the proximity to the urban extension.

The SALA states in terms of Suitability summary:

***“Although not currently policy compliant, the part of the site containing existing agricultural buildings has no overriding physical constraints or potential impacts preventing employment, community or housing uses, should the Local Plan strategy identify the need for growth in this location. However, any redevelopment must be in keeping with its rural character and context and provide for a strengthening of the strategic buffer between Nupend and Great Oldbury to prevent visual coalescence and to retain the character of this rural hamlet. Adjacent undeveloped land should be retained to enhance the visual separation.”***

“The site is being promoted and there is a reasonable prospect that the site will be available at a point in the future for development.”

In terms of achievability the SALA concludes:

*“From the information available, it is considered that there is a reasonable prospect that development as envisaged will be delivered on the site. It is also considered that the site is economically viable and the capacity of a developer to complete and sell the properties in the timeframe expected in this area is good.”*

The SALA concludes that the site has a capacity for approximately 15 dwellings which is not dissimilar in scale to the land at Sellars Road, Hardwicke Policy HAR017.

*“Taking account of the character of the site and its surroundings, the part of the site with current agricultural structures could be redeveloped for a range of rural uses, including housing. Housing should be low density development typically comprising a rural mix of detached and terraced dwellings in keeping with a current farm complex at an average density of up to 15-20 dph, and the suggested yield if development solely for housing would be up to 15 units.”*

An application was submitted on part of the site for 9 dwellings ref S.20/1975/OUT in September 2020. Part of the application site benefits from outline planning permission pursuant to the Great Oldbury development (reference S.14/0810/OUT); the remainder being an infill plot on the edge of that development between the consented area described above, the newly constructed dwellings off James Sleeman Close built pursuant to that permission and existing farm buildings.

There are no site specific or wider environmental constraints preventing the development of this land as proposed. The attached concept plan shows how around 60 dwellings could be accommodated in a development that would result in the replacement of the collection of buildings with a more modest and sensitive form of development without compromising the surrounding area. The development would therefore be in keeping with the character of the area.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A modification should be made to include land off Bristol Road, Stonehouse in the Plan. The site accords with the settlement strategy and the focus on Stonehouse as a Tier 1 settlement. The overall housing requirement is an “at least” figure and even though there appears to be some flexibility this could be quickly eroded if the new settlements fail to deliver, this will be inevitable as the trajectory for the new settlements is very optimistic.

Additionally land south east of Nupend can also contribute to housing land supply as the SALA concludes.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

