

Date: 22 Jan 2020
Our ref:
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Dear Sir or Madam,

**Representation for the Stroud District Draft Plan (November 2019)
Land at Ebley Road, Stroud**

This representation has been put forward to illustrate why Land at Ebley Road, Stroud should be included as a proposed housing allocation in the upcoming publication plan (Reg. 19 consultation), expected in Autumn 2020.

The site has previously been submitted to the SHLAA in 2010. The site was submitted twice, once as a smaller parcel and once as the entire site, site reference numbers are 67 and 60 respectively. Both areas of the site were considered to be Suitable, Available and Achievable with housing to be delivered over the plan period between 2016-2021, as detailed in the SHLAA 2011 Update Report.

The parcel of land measures circa 1.5 hectares (3.7 acres). At standard densities the site can accommodate 45 dwellings however, given the existing pattern of development along Ebley Road this may not be achievable. It is also worth noting that a small area of the site to the south west is located within flood zone 2. The site is to the north of the Stroudwater navigation canal. A buffer to the canal will be retained in any future development.

Stroud District Local Plan Policies Map shows that the site is located directly adjacent to the Settlement Development Limit which runs to the east of the site. The Policies Map also shows the site is located within an "Industrial Heritage Conservation Area" and therefore any scheme proposed for the site would need to be sensitive to this. My client is willing to provide an indicative layout on request to include a scheme which considers these potential constraints.

The site is well located given easy access to both Stroud and Stonehouse. There is a bus stop located circa 40m to the east of the site which provides access to Stroud town centre, Dursley, and Gloucester. Stroud town centre in turn provides access to the wider public transport network such



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as further buses to surrounding larger settlements such as Cheltenham and the train station which has a direct service to London Paddington. It is therefore considered that the site is located in a sustainable location which would allow residents of any potential development to access local facilities easily.

The adopted Stroud District Local Plan (2015) states the Stroud is a Tier 1 Settlement and therefore it should be a “primary focus for growth and development to safeguard and enhance their strategic roles as employment and service centres”. The site has been retained as a Tier 1 settlement in the Local Plan Review.

Stroud currently has only 265 dwellings allocated over four sites in the emerging plan. Given it is the largest settlement in the district and one of the principle settlements this is not considered to be sufficient. Cam, another Tier 1 settlement, has a total of 895 dwellings proposed in draft allocations and Stonehouse has a total of 700 dwellings in addition to 15ha of employment space.

It is acknowledged that the topography and landscape constraints surrounding Stroud make it more difficult to develop very high numbers of dwellings however, 265 is a very low number given Stroud’s size and importance in the district. Also, the only constraint associated with this site is the Conservation Area which can be overcome with good design.

██████████ sites currently in Stroud are brownfield. This will mean that remediation costs for the sites will be much higher than if they were greenfield. This will therefore likely mean that the ██████████ essentially not be viable to provide the required percentage of affordable housing. As the subject site is greenfield with minimal constraints it would be able to provide a high percentage of affordable housing to contribute towards the need for the area. Stroud currently has one of the highest percentages of social rented homes in the district, at 18.6%, and therefore providing sufficient affordable housing on new sites is essential.

Stroud is one of the most affordable areas in the district with average housing prices of £245,034 compared to the average housing price for Gloucestershire of £298,441. It is therefore important to provide new development in this area to provide people who wish to live in the district an affordable choice.

In addition, much of the housing which has been allocated within the emerging plan is at Sharpness, with circa 2770 dwellings proposed by 2031 and an additional 5000 dwelling proposed by 2050. This is likely to be unviable due to the current lack of infrastructure and facilities in this area. Allocating so many houses in one area will produce slow delivery and build out rates in comparison to

allocations which are more spread out over various sites. There is also more of a risk, if the allocation were to fall out of the plan, the Council would be left with a large deficit of reserve housing sites to find.

The following desktop appraisal for Land at Ebley Road, Stroud sets out any potential constraints to the site:

Heritage

The nearest heritage assets are Ryeford Double Lock (1340669) and Double Locks Cottage (1090662) which are both Grade II listed and located on the canal directly to the south of the site. Although these assets are both located close to the boundary of the site it is unlikely they will be affected by the development. The site slopes steeply up from the canal before levelling out and therefore it is doubtful that the area of the site adjacent to the canal will be developed. The frontage of the site cannot be seen from the lock or cottage on the canal footpath.

According to the Stroud District Local Plan Policies Map the site is also located within the “Industrial Heritage Conservation Area”. Any proposal would therefore be designed to conserve and enhance this historic environment.

[REDACTED] located within any sensitive landscape designations such as green belt or AONB. As the site is outside of the settlement boundary it is considered to be “open countryside” however, [REDACTED] surrounding on three sides by existing development and on the fourth side by the canal.

Ecology

The majority of the site is grassland with limited ecological value. There are some trees and hedges along the boundaries of the site which would be retained and enhanced in the event of any development of the site. There is the potential for some ecological value to the south of the site where it borders the canal. As previously stated, this area would not be developed due to the gradient of the area of the site.

Access

There is currently a gated access in the north west corner of the site. This access has good visibility in both directions along Ebley Road.

There are currently no public rights of way crossing or along the boundaries of the site.

Drainage

Environment Agency Flood Risk mapping for land-use planning, indicates that the majority of the site is located in a Flood Risk 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. There is a small section of the site in the south western corner which is located within flood zone 2. Again, as previously stated this are of the site is unlikely to be included in a potential scheme due to topographical and historical constraints.

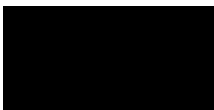
Miscellaneous

There is currently a power line crossing the site across the south eastern corner. This could either be redirected or an easement left around it in the event the site was developed.

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 housing scheme. Bruton Knowles would like to express that the site is immediately available and deliverable over the next 5 years.

Yours sincerely,



Planner