

# HEARING STATEMENT ON BEHALF OF COTSWOLD HOMES LTD

Stroud District Local Plan Review Examination Matter 6: Site Allocations

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## REPORT

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## MATTER 6: SITE ALLOCATIONS

This Statement has been prepared on behalf on Cotswold Homes LTD (CH) in respect of their interests in Land at Bath Road, Leonard Stanley. CH hold that view that several allocations are either unsound or have serious question in terms of their deliverability, which make a further allocation in Leonard Stanley a viable option for the plan going forward.

Issue

Issue 6 – are the proposed housing employment and mixed-use site allocation justified, effective and consistent with national policy?

### **1) What is the purpose and status of the guiding principles for growth for each of the eight defined areas in Chapter 3 of the plan?**

1. The district is relatively centralised with a central economic area centred on the Stroud Valleys, around 40% of the population reside here.
2. However, The Stroud cluster has significant constraints due to its location within the Cotswold Area of Outstanding Natural Beauty (**AONB**) therefore to meet the housing requirement, significant allocations have been placed away from this district. Allocations in the Stroud Valley's have an emphasis on Brownfield sites.
3. However, CH believe that in order to offset these constraints, the council have moved too much of the proposed allocation of housing too far from the district's primary settlement, primarily through the proposed allocation at Sharpness Dock [**CD1, PS36**], located at the southern periphery of the district.
4. Stonehouse cluster, which also benefits from a Tier One settlement, benefits from a central location within the district, with good access to both district's other tier one settlements: Stroud and Cam & Dursley. Notably this cluster has been allocated a major employment site [**CD1, PS20**] at J13 of the M5 junction; making it a clear area of emerging growth. As demonstrated by the existing allocation in Local Plan at Great Oldbury [**SDLP: SA2**], and its proposed extension in the SDLPR, this cluster is able to accommodate growth despite its impact on view from the Cotswold Escarpment, in a way that is not possible in Stroud District.
5. CH therefore believe the plan could be amended for minor settlements within the Stonehouse Cluster to accommodate more growth and in doing so meet more of Stroud's housing need within the vicinity of its major economic centres without detrimentally impacting upon the setting and character of the Cotswold AONB.

### **4. Site allocation that include housing development specify dwellings capacity figures.**

**a) Is it clear how these have been determined for each site allocation? Are they based on the suggested yields from the SALA, or have they been updated to take account of more recent developer evidence or detailed assessments?**

6. It appears that the SALA does provide some basis of predicted planning yields from allocations within the plan. However, according to finalised SALA methodology [EB18, p9], the deliverability of sites is “evidenced from a broad assessment of economic viability of a site” and confirmed by a SALA panel, this methodology has had no greater finalisation beyond this statement. Nor has it had any review in light of more up to date resources regarding deliverability in the district such as the Housing Delivery Test or Five Housing Land Supply (5YHLS)
7. Furthermore, there is no evidence of the use historical build out rates in the district informing the timescale of proposed allocations at any time, even if it has occurred. This information is available from reputable resources such as Lichfield’s Start to Finish Document<sup>1</sup>, last updated in 2020. This methodology was built using up to date 5YHLS evidence from Councils. CH recommend the adoption of an approach based on build out rates as evidenced by up-to-date 5YHLS land supply data provided in December 2022.

**e) Overall is the development density and capacity for each individual site justified?**

8. In the absence of an available evidence-based approach, based on historical build rates, it is presently not possible to form a view.

**Can the council confirm which sites in the plan have been allocated in a previous plan and explain why these sites have not been successful delivered? Do the same reasons exist now, and if so, why does the council consider the sites will be delivered during this plan period?**

9. Reviewing Stroud’s most recent 5YHLS statement it is clear build out rates for large sites are much lower than anticipated. For example, Land West of Stonehouse received outline permission in 2014 [S.14/0810/OUT], with the first reserved matters application for housing not receiving permission in 2018, meaning that as of 2022 it has delivered at a rate of 121 dpa since the first reserved matters application or 67 dpa since the first outline permission was received over a 9 year period. This allocation has still not been fully built out nearly 10 years since first receiving permission, with 742 dwellings yet built.
10. These remaining approximately 700 homes appear to have been reallocated in the SDLPR [CD1, PS19a]. This emphasises the difficulty of relying on strategic sites for the vast majority supply as is the position taken by the council and has been the case with development at Great Oldbury, will not deliver in the lifetime of the plan, and will instead be re-submitted to meet housing requirement again allowing for their allocation against future versions of the plan.

**6. As regards the assessment of development impacting on landscape and scenic beauty of the AONB, we note the council’s document on development in the Cotswold AONB dates may 2021 (EB39). This seeks to assist in justifying the two-site allocation for housing development in the AONB (Policy PS05 and PS41). Whilst our questions on these specific sites are set out below, we have the following general queries about the assessment of development impact on the AONB**

**a) Are the conclusions set out in EB39 justified and consistent with national policy?**

11. Paragraph 176 of the NPPF states that “great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty” and that the “scale and extent of development within all these designated areas should be limited while development within their setting should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas”.
12. CH are concerned the SLDPR has not been carried out with the utmost regard to this guidance, given that clear alternatives to allocations PS05 and Policy PS41 have not been taken forward in the plan review. The settlements would be capable of meeting the housing needs located within AONB with less of an impact on its character; falling outside the designated landscape, but within its immediate socio-economic context.
13. When assessed by the council in 2017 **[EB19c, p84]**, the proposed allocation at Bath Road, Leonard Stanley was described as having the potential for an allocation of 60 dwellings. However, in conjunction with the findings of a planning appeal at the site **[APP/C1625/W/16/3150621]**, it was considered problematic in its immediate landscape impact. However, the inspector also noted that the impact on setting of the Escarpment, afforded status as a special quality of the AONB in the Cotswold Management plan was considered limited.
14. *“11. In terms of long-range views from the escarpment to the south of the village and higher ground to its east, due to the distance and angle of view, the development would be likely to merge in with the existing development to a large degree.”*
15. Given this, CH believe that Land at Bath Road would be more favourable to meet requirement for an allocation to meet housing need within the AONB than the proposed allocations in Minchinhampton and Painswick.

#### **Allocation PS05 East of Tobacconist Road**

**19) The site is allocated for up to 80 dwellings and associated community and open spaces uses and strategic landscaping.**

**a) As regards the site’s location within the AONB our queries are as follows:**

**i) Has its allocation within the AONB been robustly justified?**

16. In lieu of the above response to question 6, CH are not satisfied that there is a robust justification for the allocation within Minchinhampton. There is little in the way of justification provided in the plan itself for the allocation. Reviewing the evidence base, The SALA **[EB19c, p.87]** describes the site as having medium sensitivity in landscape terms with need to protect the wider landscape, implying but not explicitly referring to its negative impact on the surrounding AONB.
17. Given that Minchinhampton is located prominently with views over the Stroud Valley. Development here will inherently have an impact upon the landscape of the AONB.

**g) Is the inclusion that affordable housing will be for those with a local connection justified? How will this be determined?**

18. The allocation states that “Affordable housing will be for those with a local connection to address local housing needs within the AONB” [CD1, PS05], despite this, only 19 households were found in need of housing within Minchinhampton Parish Housing Needs Survey Report conducted in February 2022 {EB97, p.12}. In their justification given in the Cotswold AONB policy assessment, the council state that that the development of 80 homes would allow, through the incorporation of 30% affordable housing, 24 affordable homes to come forward. However, in the view CH this constitutes the overdevelopment of a settlement in a sensitive location when smaller a solely affordable allocation would suffice to meet the localised need of the parish.
19. As stated in the response to matter 3, Stroud District evidentially has a need for both affordable housing and general market housing, however it is unclear why this need is being met within rather than immediately outside the Cotswold AONB.
20. This appears an unsound basis by which to allow a substantial allocation.

**Local Sites Allocation Policy PS06 The New Lawn, Nailsworth**

**21) The site is allocated for approximately 90 dwellings and associated community and open space uses and enabling infrastructure.**

**a) The sites delivery is subject to the relocation of Forest Green Football Club and the retention or relocation of associated community uses what progress has been made on this?**

21. CH are concerned about an allocated site that is dependent on the planning process to deliver the approval of another major development. The Eco Park proposals, which include the new stadium that Forest Green Rovers F.C intend to move to received outline permission in 2019 [S/19/1418/OUT] however an application proposing revisions to the scheme has been submitted [22/0206/OUT]. A further application under consideration by the council is an EIA scoping opinion, validated 2021 which has yet to be processed.
22. CH are also aware that there are several other applications presently going through the planning process that form part of the package forming the “eco-park development”. Extensive works associated with the development park such as reinstatement of the ‘missing mile’ of the Stroudwater navigation [S.19.0290/FUL] despite being received in 2019 and validated in 2021 has yet to be validated.
23. Presently the only work being carried out at the eco-park site relate to the development of two training pitches for training purposes [S.21/1739/FUL].
24. Given that this site is completely dependent on the successful building out of a large green-field mixed use site, it appears unlikely to come forward in the short-medium term. In the SALA [EB19b, p.85] the council envision the likelihood of the site coming forward from 2027, yet this appears optimistic at best given the several different factors contingent the development of the eco-park, not least the financing of the proposals, and other matters beyond the scope of the planning system.

**Matter 6C Stonehouse Cluster Site Allocations**

**Local Sites Allocation Policy PS42 Land off Dozule Close, Leonard Stanley**

**26. The site is allocated for up to 15 dwellings and associated open space uses**

**a) The policy seeks the retention of the majority of the southern part of the site in open space use and the conservation of existing trees and hedgerows are these requirements justified and sufficiently clear to a developer or a decision maker?**

25. CH are making this statement in respect to their interests for an alternative site for development in Leonard Stanley. Despite this, fundamentally; land off Dozule Close offers several barriers as a deliverable development as was noted by the council in the SALA [EB21c, p7], where it was considered as having the future potential.

26. The proposed allocation is exceptionally narrow and will require significant landscaping to the South to respect the amenity of residential dwellings to the South. Although the impact on the Escarpment has now been limited, the proposals now fall within a built-up area of the village which in many ways provides a greater challenge in taking them forward, ensuring a positive relationship with the dwellings that surrounding them.

**B) the supporting text states that development should be focused on the northern part of the site with access from Dozule Close. Is this justified and should this be clearly set out in the plan?**

27. CH believe that the factor that has fundamentally limited the amount of development allocated to Leonard Stanley is the council's position in the plan that Leonard Stanley and King's Stanley. Yet this it is clearly stated in the assessment that development has "now filled in the previous countryside gap between Leonard Stanley and Kings Stanley" [EB21c, p7], limiting the landscape impact that would have existed on the Cotswold AONB

28. The access to Dozule Close allows allocation to be attributed to Leonard Stanley, in line with the council's position within the SDLPR that the two settlements remain as separate entities when this is clearly no longer the case. CH do not seek to question whether these allocations are justified, however if they are deemed to be by virtue of a coalescence of these two settlements into one, then clearly there is the capacity for the Stanley's to take forward a further allocation in the context of questionable deliverability at other sites in the district.

**Local Sites Allocation Policy PS16 Land South of Leonard Stanley School Primary School**

**27. The site is allocated for up to 25 dwellings and associated open space uses**

**a) The policy seeks the conservation of existing hedgerows and trees adjacent to Bath Road. Is this justified and achievable?**

29. CH believe that fundamentally this proposed allocation is justified and achievable in line with those at Dozule Close; however, this justifiability reflects the Stanley's sustainability as a location for

development, which could be enhanced and furthered in line with an accurate presentation of Leonard Stanley and King's Stanley in the settlement hierarchy.

**Strategic Site Allocation Policy PS20 Stonehouse – Eco Park M5 Junction 13**

**f) What progress has been made on the re-opening of Stonehouse Bristol Road Rail Station, what are timescales of its delivery and is it feasible? is criterion 15 justified?**

30. As noted in the response to matter 5; the SDLPR places emphasis on the opening of an additional station as part of the justification for the garden village at Sharpness [CD1, PS36], however as stated there are clear issues with delivering an additional station in Stonehouse which has been a long-term objective for the council.

31. Policy SA2 – Land West of Stonehouse also made the development of an additional station a key criteria of any masterplan for its development when the plan was adopted in 2015, yet despite the building out of the allocation in the intermitting period, the railway station has not come forward. Evidencing the fundamental difficulty of securing such additional infrastructure.

**Local sites allocation policy PS41 Washwell Fields, Painswick**

**50. The site is allocated for up to 20 dwellings and open space units**

**A) As regards to the site's location within the AONB our queries are as follows:**

**i). Has its allocation within the AONB been robustly justified and is this suitably recognised within the policy**

32. The justification within the plan for this allocation is extremely limited. Painswick, as with Minchinhampton, is located within the Cotswold AONB, a designated landscape for protection. The SALA identifies that the landscape sensitivity would be high/medium to housing uses. Given its location on the outskirts of the village of Painswick, beyond the existing settlement boundary, CH believe this is unsound and should be classed as high.

33. The Cotswold AONB policy Assessment [EB39, p.4] suggests that the impact on the AONB would be limited by development on three sides and a farm to the East. Despite this; CH maintain that given the topography of Painswick, in a deep valley surrounded by PROWs and other settlements, any additional development to the settlement will inherently have an impact on the setting in the AONB and clearer justification for doing so needs to be provided in the plan.

**ii) How will a decision-maker determine that landscape impacts within the Cotswold AONB be minimised when determining future application for the site?"**

34. Given the absence of criteria, and an unwillingness by the council to address the relationship between proposed allocation it is unclear how such a decision could be made in line with national policy.

**E) Is the policy wording that affordable housing will be for those with a local connection justified? How will this be addressed?**



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35. In the policy assessment **[EB39, p.5]**, in a similar vein to their justification for the allocation at Minchinhampton, the council point to parish HNS which identified 16 households with need. Therefore a 30% affordable development would provide 6 affordable homes.
36. It is therefore unclear, given that the justification for the development is based on affordable housing, why an 100% allocation for affordable housing has not been sought?
37. CH note that Stroud, unlike its neighbour, Cotswold District Council, benefits from many villages of similar character, scale and amenities that do not fall within the Cotswold AONB, but immediately adjoin it, where landscape impacts could be limited or mitigated more effectively. Therefore it is the duty of the council to protect this designated natural environment as well as providing the affordable homes that the district needs.

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<sup>i</sup> <https://lichfields.uk/content/insights/start-to-finish>