
‘Draft Plan for Consultation’ Stroud District Local Plan Review (November 2019)

Representations by Savills on behalf of L&Q Estates

'Towards the Emerging Spatial Strategy'

Representations by Savills on behalf of Taylor Wimpey



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Introduction

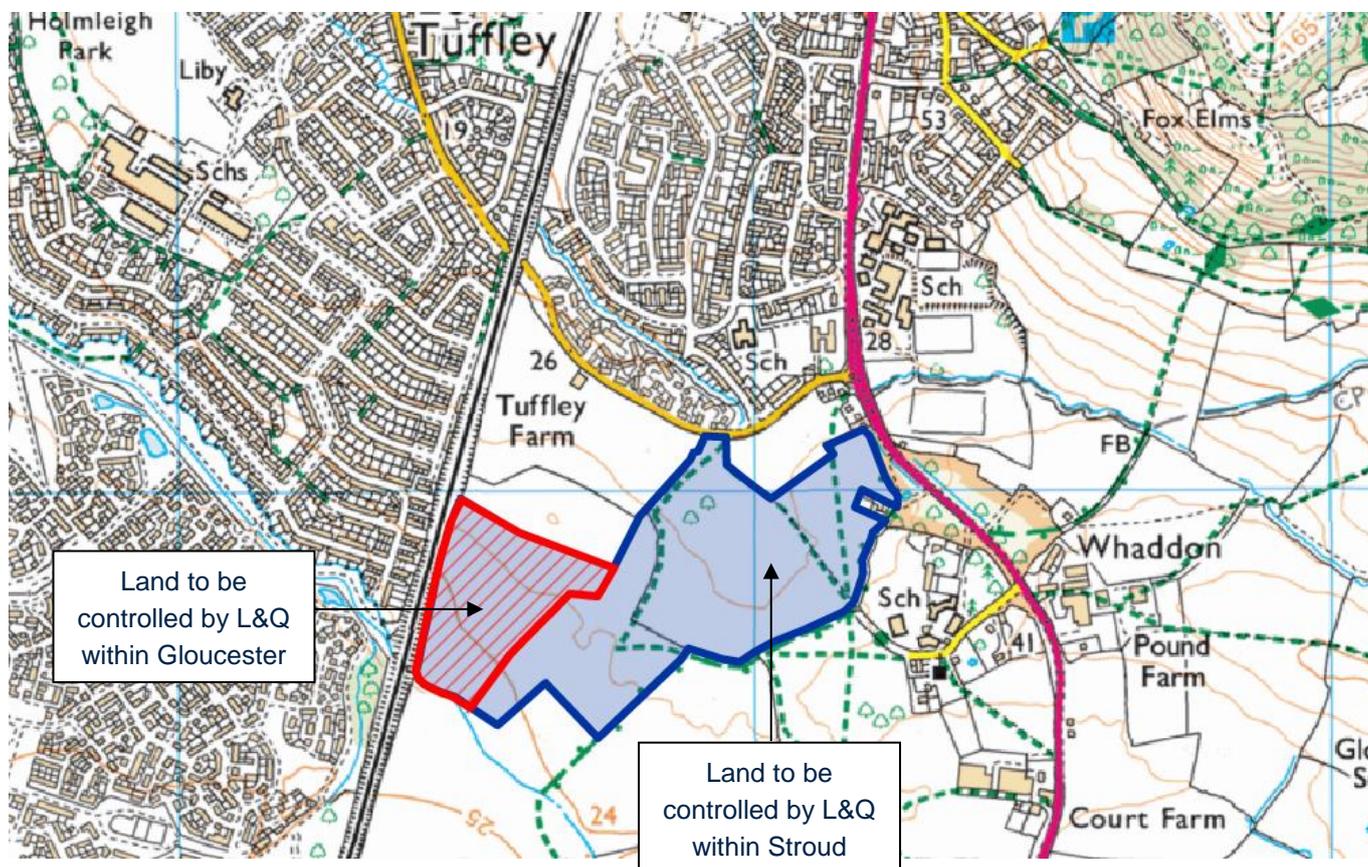
L&E Estates

These representations are submitted by Savills on behalf of L&Q Estates. L&Q Estates is one of the UK's largest, most successful, strategic land development companies with over 40 years' experience in promoting and developing high quality residential, commercial, retail and mixed-use schemes throughout the UK.

L&Q was founded in 1963 by a group of 32 people who had a vision of ending homelessness. With an initial investment of £32 in 1963, the charity is now recognised as one of the most dynamic, forward thinking housing organisation in the UK. L&Q Estates is the strategic land business of the London & Quadrant Group (L&Q).

L&Q Estates (L&QE) is in the process of securing an interest in land to the South of Gloucester, between the railway line to the west and Stroud Road to the east (see Figure 1 below).

Figure 1 – Site Plan





The figure above shows the overall extent of the land promoted by L&QE. Approximately 6 hectares fall within the Gloucester City administrative area and a further 17.3 hectares are within Stroud District Council (SDC). It is anticipated that the total capacity would be in the region of 500 dwellings (of which circa 375 dwellings would be within Gloucester City). The land within SDC is identified in the Emerging Stroud Local Plan (from here on referred to as the ‘Draft Plan’) as part of a larger area known as ‘Land at Whaddon’.

The Local Plan Review

The existing Local Plan was adopted in November 2015 and there is therefore less than a year until a review is required¹. Given the increase to the housing requirement there is no doubt that this review would indicate that it is necessary to update the Plan. In this context we welcome the progress that has been made by SDC in the preparation of the new Local Plan and the commitment to consultation on the Final Draft Plan before moving to the Pre-submission consultation later in 2020.

Arguably the greatest challenge facing SDC in the preparation of the Draft Plan is the significant increase to the housing requirement. Increasing housing delivery by approximately 40% from the adopted Local Plan will require a step change in the delivery of housing. It is important that the Local Plan positively supports this step-change, and that once adopted, it is an effective, deliverable and positively prepared plan that provides for the right development, of the right quantities, and in the right locations.

The production of an effective, deliverable and positively prepared Local Plan will not only provide a solid foundation for tackling the increased housing requirement but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the Local Plan submitted for examination is sound. Consistent with the National Planning Policy Framework (the “Framework”) (February 2019), to be sound, the Local Plan must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

¹ Paragraph 33 of the Framework



- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

In addition to satisfying these ‘tests of soundness’, there are a number of legal obligations placed upon the authorities which govern the plan-making process. Of particular relevance to the content of the Local Plan are the provisions of paragraph 39(2) of the Planning and Compulsory Purchase Act 2004 (the “2004 Act”), which requires that, in plan-making, local planning authorities *“must exercise the function with the objective of contributing to the achievement of sustainable development”*.

These representations cover a number of matters in the Draft Local Plan and the associated evidence base. They are intended to be constructive and to assist SDC with the production of a sound and legally compliant development plan document. Many elements are supported and we recognise the ambition and commitment of the authority to tackle key issues facing the authority area. For example, the decision to endorse the housing requirement arising from the Local Housing Needs Assessment (LHNA) is strongly welcomed. This is an essential component of a sound development plan and the acceptance of this at this early stage in the plan-making process enables all those involved to focus on the key issues and challenges of how to deliver this step-change in housing development in the most sustainable manner. However, fundamental concerns are raised regarding certain content of the Draft Plan and it is essential that these matters are aired and addressed prior to the publication of the Pre-submission Local Plan later this year.

In order to most effectively and efficiently respond, we have structured these representations around the five principal sections of the Draft Plan.

- Section 1 addresses the Development Strategy, including the Key Issues, Vision and Strategic Objectives of the Local Plan, the ambition to deliver carbon neutrality by 2030, the settlement hierarchy and developer contributions. As is the case with the objectives themselves, the comments and issues raised in this section set the context for the subsequent representations on the policies and allocations.
- Section 2 responds to the overall spatial vision and the relevant sub-areas within SDC. In particular it addresses draft Policy PS36 (Sharpness New Community), raising significant concerns over the soundness of this proposed allocation. It then addresses Policy G2 on the Land at Whaddon and explains why this is a suitable, sustainable and deliverable location for development and why L&QE consider this land should be allocated in the Stroud Local Plan now.
- Section 3 comments upon the Core and Delivery Policies of the Draft Plan, addressing detailed matters which will be important in the determination of all future planning applications.

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- The final section provides a conclusion and summary of the key issues raised through our representations.

1. The Development Strategy

Key Issues and Strategic Objectives

- 1.1 There are a number of common themes in the Key Issues defined in Chapter 1 of the Draft Plan and the resultant Strategic Objectives within Chapter 2. In the vast majority of cases we support these issues and objectives and agree that they represent a sound basis upon which to define the future development plan policies. There are however a number where we object, not to the issue or objective itself, but to how this has been followed through and reflected in the policies, proposals and allocations in the subsequent sections of the Draft Plan. These objections have been grouped and to avoid duplication, this section of the representations deals with the relevant themes rather than the individual issues or objectives.

Delivering a sustainable pattern of growth

- 1.2 One of the priority issues on page 14 of the Draft Plan is to concentrate *“housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure”*. Key Issue 18 similarly seeks to improve the sustainability of the transport system to help reduce CO² emissions *“with an emphasis on limiting car use by extending the cycling and walking network and making improvements to public transport”*.
- 1.3 These are entirely logical and sound objectives and consistent with the overarching principles of the Framework. In essence, this priority of the plan is explicitly supporting geographical sustainability and emphasising the importance of locating development where sustainable travel opportunities exist to meet the needs of future residents. As recognised at paragraph 1.30 of the plan, CO² emissions from transport continue to rise both locally and nationally. Establishing a spatial strategy which prioritises future development at locations where travel options exist which do not involve the generation of CO² emissions is crucial if the authority is to achieve its climate change objectives.
- 1.4 Whilst we support this principle and welcome its inclusion as a *“priority issue”*, we have concerns that the plan does not then subsequently act upon this priority in the selection of the larger strategic housing locations. Further details are provided later in this representation.

Economic Growth and Commuting Patterns

- 1.5 The third key issue identified under the heading of *“economy”* is to address a high level of daily commuting out of the District to Bristol, Gloucester, Cheltenham and Swindon. Whilst there are obvious sustainability merits to reducing travel for employment purposes and we therefore endorse

this ambition, it is important that the authority is (a) realistic about the extent that this will change; and (b) that the Spatial Strategy of the Local Plan reflects the most realistic distribution of economic and jobs growth during the planned period and not the aspiration.

- 1.6 Stroud District contains a number of settlements with motorway access to large areas of employment outside of the authority area. To provide some context to the scale of these markets we have analysed the total number of employees in these neighbouring areas. According to the Labour Market Profiles published by Nomis, there are a total of 685,000 jobs within the West of England and a further 198,000 jobs in the Gloucester, Cheltenham and Tewkesbury conurbation (JCS Area). This compares with circa 60,000 jobs within Stroud.
- 1.7 Table 1 below shows how the number of jobs in each of these three geographies has changed over the past 10 years². The evidence shows that in the period from 2008 to 2017 the number of jobs in the West of England and the JCS Area increased by 15.13% and 15.12% respectively. In contrast, the number of jobs in Stroud increased by only 3.45% in the same period.

Table 1: Change in number of jobs over the past 10 years

Date	Geography		
	West of England	JCS Area	Stroud
2008	595,000	172,000	58,000
2009	607,000	180,000	57,000
2010	605,000	186,000	57,000
2011	616,000	182,000	57,000
2012	604,000	184,000	60,000
2013	614,000	184,000	58,000
2014	644,000	192,000	60,000
2015	656,000	195,000	61,000
2016	670,000	189,000	61,000
2017	685,000	198,000	60,000

Source: ONS Business Register and Employment Survey on the Nomis website

- 1.8 The job density figures published by Nomis provide a further helpful insight into the number of jobs available relative to the available labour force. These figures represent the ratio of the total number of jobs to population aged 16-64. For example, a ratio of 1 would indicate that there is precisely 1

² The most up to date Nomis data is available up until 2017.

job per person aged 16-64. Table 2 below provides the evidence for the past ten years for the West of England, JCS Area and Stroud.

Table 2: Change in ONS Jobs Density Calculation over the past 10 years

Date	Geography		
	West of England	JCS Area	Stroud
2008	0.84	0.85	0.83
2009	0.85	0.88	0.82
2010	0.85	0.90	0.81
2011	0.86	0.88	0.82
2012	0.84	0.89	0.86
2013	0.84	0.89	0.83
2014	0.88	0.93	0.85
2015	0.88	0.94	0.86
2016	0.89	0.92	0.86
2017	0.90	0.95	0.85

Source: ONS Jobs Density on the Nomis website

- 1.9 Table 2 demonstrates that over the ten year period from 2008 to 2017, there has been a 11.8% increase in the ratio of jobs to people in the JCS Area, a 7.1% increase in the West of England, but a much smaller increase of 2.4% in Stroud.
- 1.10 The analysis above demonstrates the level of reliance placed upon the neighbouring areas of the West of England to the south and the JCS Area to the north. Given the scale of these areas, the presence of a number of higher and further education establishments and the clustering benefits to business, it is of no great surprise that employment has grown at a faster rate in these areas than in Stroud. As a result of this job growth, the evidence indicates that the available workforce has decreased in both the West of England and the JCS Area. If further economic growth takes place in these areas line with recent trends, this is only likely to draw a greater proportion of workers from the labour supply of Stroud, thus increasing out-commuting.
- 1.11 In all likelihood, these proportionate levels of growth will continue and the Travel to Work areas to the north and south of Stroud will continue. It is particularly important that the Local Plan responds to these commercial market realities and plans for a pattern of housing and employment growth which responds in the most sustainable manner.



1.12 It is also important to the spatial strategy that where housing and employment allocations are proposed that there is a realistic prospect of these being delivered. For example, it should not simply be assumed that allocating land for employment will automatically result in the delivery of new jobs. We return to this matter later in these representations in response to the Spatial Strategy.

Affordable Housing

1.13 We broadly support the objectives outlined under the “*Affordable Housing*” section. The evidence clearly demonstrates that there is both an acute and urgent need to increase the delivery of affordable housing within the authority area³. In accordance with paragraph 20 of the Framework it is incumbent upon the authority to therefore put in place plans which will support the delivery of sufficient affordable housing to meet the identified needs.

1.14 There are many factors that can impact upon the delivery of housing and with it affordable housing via Section 106 agreements. In some cases the economics of development do not stack up to produce a viable development. This can be a particular issue for the redevelopment of previously developed land where the abnormal costs of remediation and demolition, alternative use values, and the often complicated nature of such building sites mean that the cost of redevelopment in many cases does not outweigh the capital return. The example of Ham Mill in Thrupp on page 16 of the Draft Plan provides a timely reminder and serves to demonstrate this key challenge facing the delivery of affordable housing.

1.15 In other instances, the cost of infrastructure, particularly where this is of a scale required to deliver a sustainable New Community, can have a similar impact on the return on capital of a development, rendering it marginal and in some cases unviable. We have particular concerns in this regard with the proposed New Community at Sharpness given the considerable scale of social, community and transport infrastructure needed to ensure that a development in such a location provides a sustainable location for a new community and is not simply a car-based commuter town.

1.16 Where viability challenges exist it is frequently the case that affordable housing provision is reduced as a consequence. In order to ensure that this is not the case in the emerging Local Plan, we strongly encourage SDC to very carefully appraise the viability implications of all policy requirements and to adopt a cautious approach when doing so.

³ For example, the ‘Summary of Affordable Housing Provision’ on Page 2 of the Housing Land Availability Report (1 April 2019) confirms that at total of 354 affordable dwellings have been completed in the three years from April 2016 – March 2019. The target for the same period was 1,338 affordable dwellings (446 dwellings per annum).



- 1.17 We return to this matter later in these representations as, in contrast to certain allocations in the Draft Plan, a significant benefit to the allocation of Land at Whaddon is that it does not have the same viability challenges.

Carbon Neutrality by 2030

- 1.18 Climate change is a key priority for the plan-making process and it is important that the Stroud Local Plan incorporates all feasible and deliverable measures to reduce CO². There are however many technological, viability and supply change challenges to overcome in order to deliver carbon neutral residential development and it is therefore necessary to strike a balance between climate change objectives and social and economic objectives.
- 1.19 However laudable and desirable, Strategic Objective SO5 of “*securing zero carbon development through building design*”, is not an appropriate target for the Local Plan. The Government has clearly stated that the energy efficiency of new housing is a matter for Building Regulations and not the planning system. The Housing Standards Review restricts the freedom of authorities to adopt optional standards for specified matters only, covering access, water-efficiency and internal space. Where this flexibility exists it is necessary for authorities to test the viability implications before specifying the standards through the local plan. The priorities and policies of the Draft Plan should be amended accordingly.

Spatial Strategy

- 1.20 The Spatial Development Strategy is set out in Section 2.3 of the Draft Plan. For the most part we support this strategy. Focusing an appropriate scale of development at serviced and sustainable settlements is, on the face of it, a rationale and logical strategy. There are however two specific areas where we object to the Spatial Strategy.
- 1.21 First, whilst we support the redevelopment of previously developed land in principle, we object to the reliance placed upon it in order to deliver the strategic housing requirement. There are frequently very considerable challenges with the redevelopment of such sites which in many instances cannot be overcome and inevitably preclude redevelopment. These include, but are not limited to the following:
- *Alternative / Existing Use* – unlike greenfield land which is almost always in agricultural use, previously developed sites often have buildings or land which have a value either for their existing or an alternative use other than housing. This represents a higher threshold land value from which to establish whether the development would be viable; a threshold which a number of developments will not exceed.



- *Costs of site preparation* – previously developed sites are much more likely to require more costly and time intensive site preparation than greenfield land. They will almost always have existing buildings which need to be demolished unless they are converted as part of the development and many have historical uses which require decontamination prior to redevelopment.
- *Provision of social and community infrastructure* – greenfield sites are typically able to be masterplanned and developed in such a way that they can incorporate sufficient green infrastructure to provide for the new residents. Previously developed sites in contrast are often more constrained and rely upon provision off-site. This either results in a deficiency in provision or adds to the infrastructure costs associated with the delivery of development.
- *Complex housing delivery* – Previously developed sites come in a wide range of locations and sizes. Some will be relatively straightforward to redevelop, however, others will be situated in tight urban environments, adjacent to operational buildings or with heritage constraints. This complexity inevitably adds to the cost and frequently requires urban design compromises which can impact upon value.

1.22 It is for these reasons and others that there have been and will continue to be significant challenges to the redevelopment of previously developed sites within Stroud. We do not object to their allocation, but we are of the opinion that a very cautious approach should be adopted whereby only a small proportion of the housing anticipated to be delivered on previously developed sites (even those with planning permission) are counted towards the strategic housing requirement. We urge SDC to undertake a review of the supply on such sites based upon the updated definition of ‘deliverable’ within the 2019 Framework and then apply a discount to ensure this element of supply does not fall short.

1.23 Second, new Garden Communities *can* provide a suitable option to deliver large scale development but only where they are sustainably located and capable of delivering the infrastructure required to support the needs of the new residents. Of the two new Garden Communities proposed within Stroud, we have significant concerns with the development proposed at Newton & Sharpness. We expand upon the reason for these objections later in these representations but the implications are that this should be removed from the spatial strategy.

Meeting Gloucester’s Housing Needs

1.24 The SDC administrative area has a very clear functional relationship with the major urban areas to the north and Gloucester City in particular. Indeed, the southern boundary of the city is drawn very



tightly around the Gloucester City Council (GCC) administrative area and, in places, abuts the edge of the existing built up area.

- 1.25 With this in mind, we welcome the acknowledgement of the strong relationship between the SDC and GCC administrative areas in the Draft Plan and the willingness of SDC to accommodate a proportion of the housing growth needs that cannot be delivered within GCC. However, this does not outweigh the importance of accommodating the growth needs arising from within SDC in the most sustainable manner. Land to the south of Gloucester (draft Policy G2 – Land at Whaddon) is, for the reasons we will explain later in these representations, the most sustainable location for housing development within SDC. Development here should not be 'reserved' simply to meet the growth needs of GCC.
- 1.26 Rather, and in accordance with the Framework, the Local Plan should allocate the most sustainable locations to deliver the housing requirement for SDC and then identify the next most sustainable and deliverable location(s) which are capable of accommodating the 'overspill' from GCC. To do otherwise risks allocating land for development which does not contribute to a sustainable pattern of development and which is not therefore justified and effective.
- 1.27 In the following section of these representations we explain the reasons why the Land at Whaddon should be preferred to land currently allocated in the Draft Plan

The South of the District

- 1.28 Paragraphs 2.33-2.34 of the Draft Plan correctly explain that any growth and infrastructure proposals in the West of England would likely have a bearing upon the infrastructure available to support development in the southern part of SDC. We do not dispute this logic, albeit clearly there would need to be robust testing of the implications as the associated developments at Charfield and Buckover etc would also consume, as well as increase, infrastructure capacity.
- 1.29 Notwithstanding it would not be prudent or appropriate for the Stroud Local Plan to assume the delivery of any infrastructure or development that was proposed in the Submitted Draft JSP. The Draft JSP has been Examined and heavily criticised by Inspectors in their Letter of 11 September 2019. We understand that the decision has now been taken to withdraw the JSP from the Examination process and to instead progress individual local authority based Local Plans. There is currently therefore no planning status and no need to consider either the developments or infrastructure improvements proposed in the draft JSP.
- 1.30 Moreover, one of the major criticisms made by a number of objectors to the JSP was that the proposals assumed the delivery of a substantial package of infrastructure improvements with little

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or no evidence that the funding would be available to enable it's delivery. Even if the JSP had progressed through the Examination, there would remain significant uncertainty over the delivery of the infrastructure proposed; further reason why the Stroud Local Plan should not place any reliance on infrastructure improvements in the West of England.



2. Making Places

- 2.1 Whilst we support the identification of the Land at Whaddon as having potential for development, we do not agree that any future allocation should depend upon the an assessment of the housing needs of Gloucester. It is our contention that the Land at Whaddon represents the most sustainable location for strategic scale development within the District and that it should therefore represent a component of the housing supply for Stroud, allocated through the emerging Local Plan.
- 2.2 This section of these representations explains why an allocation should be made through this plan and the decision not deferred to a future review of the Gloucester, Cheltenham, Tewkesbury Joint Core Strategy. In so doing it first outlines the significant concerns we have with the soundness of the strategic allocation within the plan at Sharpness. The New Community is not in our view a sound strategic allocation and should not be taken forward as part of the Pre-Submission Draft Plan. It then explains why the Land at Whaddon is a suitable, sustainable and deliverable location for development.
- 2.3 The allocation of Land at Whaddon would represent either a logical and deliverable replacement for the Sharpness New Community or a sound additional allocation in its own right. The final paragraphs in this section explain why this is the case.

Draft Site Allocation PS36 – New Settlement at Sharpness

- 2.4 The New Community at Sharpness is proposed for allocation under Policy PS36 of the Draft Plan. By the end of the plan period it has been assumed that the development will have delivered 2,400 of a potential 5,000 dwellings alongside supporting infrastructure. This represents circa 30%⁴ of the residual housing requirement (insert footnote) and it is therefore a key proposal within the emerging plan and a very significant component of the District's housing land supply.
- 2.5 With this in mind, and given there is very little flexibility for housing supply within the plan, it is right and proper to scrutinise both the principle and details of the emerging New Community.
- 2.6 Our objections to the proposed allocation of the Sharpness New Community are grouped into three categories:
- a) suitability and sustainability of the location to accommodate strategic scale development;
 - b) viability of the development proposals; and

⁴ 2,400 dwellings as a proportion of the 7,993 dwelling residual stated in Table 2 on Page 32 of the Draft Plan.

c) impact upon the Severn Estuary SPA.

2.7 Each of these concerns individually raise significant doubts over whether the new community allocation is “justified” and “effective”. When combined however they result in very significant objections to the soundness of this key component of the Draft Plan. Further details are provided below.

a) Suitability and Sustainability of the Location

2.8 We consider that Sharpness / Newtown is simply not a sustainable location for strategic scale residential development and that locating a New Community there would run contrary to the strongly framed environmental and sustainability objectives of the Draft Plan and key tenets of national planning policy.

2.9 The key issues and objectives set out in the initial chapters of the Draft Plan highlight in various locations the importance of sustainable transport measures. Indeed, the Draft Plan states:

- *Promoting a development strategy that reduces our District's carbon footprint, adapts to climate change and respects our environmental limits by: ... supporting a pattern of development that prioritises the use of sustainable modes of transport⁵; and*
- *Stroud District will become Carbon Neutral by 2030 ahead of the Government target of net Zero Carbon 2050. To support this target all new development must be: ... designed to discourage the use of the private car, irrespective of fuel source, by prioritising in order of importance: walking, cycling and public transport to deliver the highest possible share of trips by the most sustainable travel modes⁶.*

2.10 We fully endorse these positive objectives and agree that the prioritisation of walking, cycling and public transport are essential if the authority is to achieve its ambitious carbon reduction aspirations. This is clearly intended to represent a key tenet of the Draft Plan and is an approach which is consistent with national planning and transportation policy. Indeed, in accordance with paragraph 35 of the Framework, for a Development Plan Document to be found sound it must be both 'justified' and 'consistent with national policy'. To satisfy the former, the allocations within the Plan must represent an appropriate strategy when considered against reasonable alternatives, while the latter reaffirms the legal requirement in paragraph 39(2) of the 2004 Act, and in so doing

⁵ Strategic Objective SO5, page 24

⁶ Core Policy DCP1

requires plans to support the delivery of sustainable development in accordance with the wider policies of the Framework.

- 2.11 Further emphasis is placed on the importance of sustainable development strategies in Department for Transport Circular 02/2013. Page 5 of the Circular states that:

“through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth”.

- 2.12 For the various reasons explained in this section of the representations however, we consider that the proposed New Community at Sharpness fails the 'justified' and 'consistent with national policy' soundness tests and that this component of the Draft Plan is both internally inconsistent and unsound as a consequence.

- 2.13 Although Policy PS36 states that *“the development will prioritise walking, cycling and public transport over the use of the private car”* the location of the New Community is such that future residents would inevitably be reliant upon the private car, even if a new train station is delivered and rapid bus services are provided.

- 2.14 There are currently very few services, facilities and employment available in the immediate locality. Assuming the development were to go ahead and setting to one side the temporal deficit in local / day-to-day community infrastructure while those proposed as part of the New Community are constructed, in the longer-term, once the development has been completed, there would remain a relatively limited number of services, facilities and employment opportunities nearby. There is inevitably a need to travel on a regular basis. The New Community at Sharpness is not in a location which would encourage sustainable travel and the introduction of both rail and bus services would not overcome the inherent shortcomings of this location.

- 2.15 The new station is a requirement of the policy and whilst in many cases the introduction of rail based public transport can provide a step change in quality, for the following reasons we do not believe that this would be the case with the proposed New Community:

- evidence shows that only 1% of journeys to work within Stroud (and Gloucestershire as a whole) are made by train⁷. Whilst levels of patronage have increase recently, this is from a very low base and therefore represents only a small proportion of workers within Stroud;

⁷ Table 3 of the Stroud Sustainable Transport Strategy Benchmarking Report by AECOM (15 November 2019).



- the Vision Document⁸ produced by the Promoter states that the scheme will include a shuttle service to Cam & Dursley station with connections from there to Gloucester and Bristol Parkway. For public transport to be successful in drawing commuters away from their cars there needs to be a clear competitive advantage either in time or cost. The benefits of a train service are substantially diminished by the need to change at Cam & Dursley station, increasing journey times and risks of delay. They are also dependent upon the linking services from Cam & Dursley to other stations. At the present time there are a limited number of services which would be suitable for peak hour commuting⁹ with two in a southerly direction to Bristol Parkway at 8:00am and 8:55am; and one in a northerly direction to Gloucester at 8:16am. This does not represent a high frequency service which we consider would be appealing to commuters and provide the competitive advantage to the private car.
- not only has no evidence has been provided to demonstrate that the major infrastructure works required to support the development, including construction of a new station, is viability, but there is also no evidence to support the contention that a service could be viable and sustainable in the long-term.

2.16 The Vision Document also places a great deal of emphasis on the provision of new smart bus services. Whilst bus services are inherently more flexible and more realistically deliverable, for the following reasons we do not consider that they would represent a substantial number of the commuter journeys from the New Community:

- The current number of commuters who travel to work by 'bus, minibus or coach' in Stroud is only 2%¹⁰. This does not therefore represent a significant choice for many existing residents within the authority area.
- Unlike trains, bus patronage has decreased in recent years. Data from the Department for Transport shows a national and county-wide trend of reducing journeys on local authority bus services. For example the number of passengers in Gloucestershire has decreased from 21.3m in 2009/10 to 19.9m in 2018/19, a reduction of 6.6%¹¹.

⁸ Page 16 section on 'Supporting Car Freedom'.

⁹ Assumed to be trains which leave between 7:30am and 9am.

¹⁰ Table 3 of the Stroud Sustainable Transport Strategy Benchmarking Report by AECOM (15 November 2019).

¹¹ Department for Transport Bus Statistics (Table BUS0109a) - <https://www.gov.uk/government/statistical-data-sets/bus01-local-bus-passenger-journeys#table-bus0110>.



- We strongly question the competitive advantage of the bus when measured against the private car for long distance commuting to locations such as Gloucester and Bristol. This is backed up by the evidence of existing commuting patterns. Whilst the services from Berkeley to Bristol are currently more limited than is proposed as part of the New Community, the analysis of the 2011 Census available on DataShine Commute¹² reveals that only six people commuted by bus from the area (which includes the New Community) for work purposes. In contrast, 1,955 commuters drove a private car and a further 68 were passengers in a private car.
- The most significant constraint to the attractiveness of bus services is geography, and the distance from the New Community to the key employment locations south on the A38/M5 at Bristol and north at Gloucester. Bristol City Centre is 22.8 miles and Aztec West 15.1 miles to the south, while Waterwells Business Park and Gloucester City Centre are 14.3 miles and 18 miles to the north respectively¹³. These distances are considerably greater than the average distance travelled by bus for commuting purposes reported in research for the Department of Transport¹⁴ as 5.3 miles
- The distance from the New Community to key employment locations also presents a further practical challenge to the delivery and viability of bus services to meet commuting needs. It is unlikely that a single bus would be able to make any more than at most two trips from the proposed New Community to employment destination within peak hours. There would therefore need to be a very substantial fleet of buses which operate during peak hours to provide a service for residents to come close to providing a competitive advantage over the private car.

2.17 Despite the proposals for new and enhanced rail and bus services, the potential for these to successfully divert trips away from the private car is severely restricted by the inherent unsustainability of the location. No matter what public transport services are put in place, the likelihood is that the vast majority of future residents would opt to use the private car to access services, facilities and employment opportunities. This proposal is therefore contrary to the key issues and priorities defined in the draft plan.

2.18 The logical next question that needs to be answered is whether Sharpness be made a self-contained location in order to reduce the need to commute. Whilst there would inevitably be some employment as part of the New Community, the evidence does not suggest that there is likely to

¹² <https://commute.datashine.org.uk>

¹³ Distance travelled measured from the site using Google Maps shortest recommended route.

¹⁴ Department for Transport 'Commuting trends in England 1988 – 2015', Figure 14



be a step-change in employment which would have a substantial impact on the likelihood of future residents commuting for employment purposes.

- 2.19 The Draft Plan¹⁵ explains that the evidence of employment needs shows that there is a residual demand for only 14ha of additional employment land during the plan period. Yet despite the evidence, the Plan makes provision for a total of 61ha¹⁶.
- 2.20 We do not object to the principle of the Draft Plan over-allocating land for employment purposes. Indeed, allocating more land than is required will provide choice to the market and encourage delivery. It does however have consequences for the Plan and the sustainability of potential development locations.
- 2.21 For example, despite the need for only an additional 14ha of employment across the authority area, there are 17ha of employment land allocated as part of the Sharpness New Community and at Sharpness Docks. Even if all of the projected future employment growth within Stroud District was to take place at Sharpness, the evidence of demand indicates that it would not be taken up by the market.
- 2.22 Furthermore, as Map 2 of the Draft Plan indicates, the focus for the majority of employment in the spatial strategy is on the A38/M5 corridor. This is entirely logical as this infrastructure and communication corridor is a significant factor in market demand. The combination of the significant oversupply of employment land and the existence of better connected alternative locations (to Sharpness), further undermines the deliverability of such a significant scale of employment at the New Community. This in turn undermines the potential for self-containment and consequently the sustainability of the New Community proposals¹⁷.
- 2.23 In conclusion, we do not therefore consider that the public transport measures or the mix of uses proposed within the New Community would lead to a sustainable form of development.

b) Viability of the Development Proposals

- 2.24 The Promoter' Vision Document makes a number of bold claims about the proposed New Community. For example, a decentralised energy centre is proposed alongside potential for renewable technologies to achieve Net Zero Carbon. The vision sets similarly ambitious aspirations for public transport use. Indeed, one of the key features of the New Community is the opening of a

¹⁵ Table 4 on Page 36

¹⁶ Table 5 on Page 39

¹⁷ It is for this reason why we also object to the conclusion in the Sustainability Appraisal that the New Community should be scored positively against the SA Objective 14 (Climate Change).



new station and running of half hourly shuttle services to Cam & Dursley station. These are on top of the social infrastructure required of a development the scale of the New Community, including primary schools, a secondary school etc.

- 2.25 All of these aspirations come at a cost. Indeed, the combination of this proposed infrastructure would likely cost tens of millions of pounds, a significant proportion of which would be required upfront in order to enable the delivery of the first homes and engender sustainable travel patterns for their residents.
- 2.26 We note that there is no viability evidence supporting the publication of the Draft Plan, nor is there any indication that the viability of the development has been tested by the authority. Irrespective of the suitability of the location and the principle of development, given the significant development costs involved in the project and the comparable sales values and sales rates in the locality, we have deep reservations over the viability of the delivery. There is a strong possibility that either the development as a whole is not viable or that some or all of the benefits proposed cannot be delivered, diminishing the sustainability credentials of the proposed development. In either case this matter alone could require a change to the strategy and the distribution of development
- 2.27 We urge the authority to consider the viability of development as soon as possible and address the implications with an open mind. If it is necessary to deviate from the proposed Spatial Strategy for viability (or any other) reasons then it would be far preferable to do so in advance of the Pre-submission Plan publication rather than through the Examination process.

c) Impact Upon the Severn Estuary SPA

- 2.28 The proposed New Settlement is within a few hundred metres of the internationally designated Severn Estuary Special Protection Area (SPA). Accordingly a Habitat Regulations Assessment (HRA) has been made of the impact of these proposals within the of the Draft Plan¹⁸.
- 2.29 The first point to note is one of chronology. This is the first assessment made under the Habitat Regulations. It is dated 29 November and has clearly not therefore informed the content of the Draft Plan (which was approved for consultation at Committee on 24 October 2019) but is an assessment of a decision which has already been made. Indeed, the decision to include the New Community in the Draft Plan was made in the absence of evidence of the harm arising as a consequence. In this context we are particularly concerned about the key issues identified and the proposed recommendations of the HRA.

¹⁸ Habitats Regulations Assessment of the Stroud Local Plan at Draft Plan Consultation Stage (29 November 2019), Footprint Ecology



2.30 Paragraph 10.11 of the HRA states that:

“At this Regulation 18 stage, it is necessary to highlight that the Sharpness settlement requires a range of additional assessment work that needs to be informed by a number of discussions with technical specialists and also some evidence that is not yet available. A HRA conclusion cannot be drawn at this stage, but rather the following recommendations are provided to assist with a much more detailed analysis to inform the Regulation 19 stage of plan making.” [our emphasis]

2.31 As a consequence, the HRA concludes¹⁹ that:

“In conclusion it is advised that at Regulation 18 stage, this HRA cannot rule out adverse effects on the integrity of the Severn Estuary SPA/SAC/Ramsar site in relation to the Sharpness settlement proposal.” [our emphasis]

2.32 Based upon the analysis and conclusions of the HRA there is a high probability that the proposed New Community at Sharpness would have an adverse effect on the integrity of this important European Site. In such circumstances, unless convincing evidence is provided to the contrary, the precautionary principle must be adopted and accordingly “*when the likelihood of significant effects cannot be ruled out on the evidence available, it must be assumed that a risk of significant defects may exist*”.

2.33 If the conclusion remains that significant effects cannot be ruled out at the Appropriate Assessment stage, then SDC must move on to the consider alternative solutions. The guidance on the Habitat Regulations process is helpfully explained in the Planning Practice Guidance²⁰. There it states that:

“Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view the site’s conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site’s integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured”. [our emphasis]

¹⁹ Paragraph 10.22

²⁰ Paragraph 001 Reference ID: 65-001-20190722



2.34 There is an alternative available which would not harm the integrity of the SPA. Moreover, for the reasons set out in these representations that alternative – the allocation of Land at Whaddon – represents a more sustainable and deliverable strategic scale development than the New Community at Sharpness.

2.35 There is at best considerable uncertainty at this stage as to the impact of the proposals on the integrity of the SPA. Having made the decision to allocate the New Community prior to the publication of the HRA, it is fundamental to the legal soundness of the Local Plan that the Council approach this matter with an open mind and adopt an evidence-led decision. If the evidence indicates that the development would harm the integrity of the SPA or there remains doubts about the impact, the allocation must be deleted and replaced with an alternative option.

Policy G2 – Land at Whaddon

2.36 The land covered by Policy G2 – Land at Whaddon – is adjacent to the southern boundary of the Gloucester City urban area and, whilst presently in agricultural use, the urban influence gives the locality a peri-urban or ‘urban fringe’ character. Although L&QE have an interest in only the northernmost part of the area identified under Policy G2, this section of the representations addresses the allocation as a whole.

2.37 First and foremost, we support the acknowledgement that the Land at Whaddon has good potential for the development of a strategic mixed-use development. For the reasons we will come on to explain in this section of the representations, the location represents a highly sustainable and suitable location for this scale and form of development. It is also for these reasons that the land should be allocated now, through the Stroud Local Plan, and this decision not deferred until the future housing needs of Gloucester City have been determined.

2.38 Through these representations we will explain why we consider the L&QE land interest:

- a) has a strong planning pedigree having previously been supported by the independent Panel and Secretary of State through Examination of the South West RSS;
- b) represents a suitable, sustainable and deliverable location for strategic scale development; and
- c) should be allocated through the emerging Local Plan and the decision on an allocation not deferred to a future development plan document following the production of the replacement Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.

In the remainder of this section of these representations we address each of these matters in turn.

a) *Planning pedigree of the Land South of Gloucester*

2.39 The land has been promoted for a number of years through successive development plans. It was originally identified with an “*area of search*” for an urban extension to Gloucester by the Panel appointed to consider the draft South West Regional Spatial Strategy (SWRSS). In proposing the allocation, the Panel confirmed the suitability of the land for development within the defined constraints. At paragraph 4.3.27 of their Report they stated that:

“This [the construction of a station at Quedgeley] could also serve development potential within a broad swathe of neighbouring land to the east of the railway and west of M5 at Whaddon, thereby giving the facility added impetus. The land here is beyond the westward extent of the Cotswolds AONB, of no great quality in its own right and equally well related both to the built up area and to the city centre. Whether a station is provided at Quedgeley or not, it is our view that there is potential development capacity in an additional area of search here (within Stroud District and thus requiring joint working under our recommended modification of Policy J) for about 1,500 dwellings. This quantum of development would, we consider, enable the outlook from the viewpoint at Robins Wood (to the north of the land) to be adequately safeguarded without harmful encroachment into the wider countryside.”

2.40 Whilst the SWRSS was revoked prior to adoption, there is a clear planning pedigree and support for the location, which was tested at Examination and supported by an independent Panel and the then Secretary of State. Due to the revocation of the RSS however this “*area of search*” fell away, as did the joint working between Stroud District and Gloucester City Councils. Indeed, Stroud District was excluded from the joint planning arrangements of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS).

2.41 Despite falling outside of the administrative area covered by the JCS, the land was nevertheless promoted throughout its preparation. The Inspector examining the submitted JCS considered the location in her Interim Report on the JCS dated 26 May 2016. The full extract of the relevant paragraphs has been copied below as this provides important context to the Inspector’s conclusions and her explanation of why this represents a suitable and sustainable location for development. The most important elements have been underlined.

Sites outside the JCS area

79. *On the evidence before me there appear to be no other appropriate sites to form additional, sustainable, urban extensions to Gloucester, which fall entirely within the JCS area and have not otherwise been counted within Gloucester’s district*

capacity. Nonetheless, there seem to be two reasonable omission sites on the southern edge of the Gloucester urban area in Brookthorpe/Whaddon (OM3) and Hardwicke (OM4), the former of which straddles the border with Stroud and the latter of which lies wholly within Stroud.

80. These sites are outside the Green Belt and, despite the City Council's desire to expand to the north, accord with the Spatial Strategy. I have driven and walked around these sites and the wider surrounding area. In my judgement they appear to be in sustainable locations, being close to local centres, employment opportunities and schools, and within reasonable distance of the City centre.
81. Whilst these sites have undergone initial sustainability appraisal showing no absolute constraints, they have been omitted from further assessment on the basis they are wholly or in part outside the JCS area in Stroud. However, given the shortage of appropriate strategic housing sites around Gloucester, I am not convinced that this is a justified planning reason for rejecting these omission sites.
82. Under the duty to co-operate, Stroud District Council has signed a Statement of Cooperation with the JCS authorities to demonstrate its commitment to work with them to ensure OAHNs can be accommodated effectively. Furthermore, its recently adopted Local Plan (November 2015) recognises the possibility of assisting the JCS authorities in meeting their housing needs.
83. The Stroud Local Plan has already started to be reviewed and the JCS authorities should engage with Stroud District Council with a view to discussing the potential for Stroud to contribute to Gloucester's requirements by allocating land at Brookthorpe/Whaddon and Hardwicke. Pending completion of this review, a specific Memorandum of Understanding could be entered into, setting out relevant details including scale, location and type of development. If Stroud agree to allocate part or all of these sites for Gloucester's needs in their Local Plan Review, their commitment to allocate and the type and scale of development should be set out in the JCS.

Brookthorpe/Whaddon

86. The site at Brookthorpe/Whaddon straddles the border with Stroud and consists of Land South of Grange Road within the Gloucester City area, together with a larger adjacent site within Stroud district. Whilst the Land South of Grange Road is being considered for inclusion in the Gloucester City Plan, I understand that

the Stroud site, after being assessed as part of the Stroud Local Plan making process, was rejected as it was not needed to contribute to Stroud's OAHN.

87. *I am told by the developers that the Grange Road Land has capacity for about 250 dwellings and that the larger site overall could provide a housing led development in the region of 2,750 dwellings, together with a new primary school and local centre. Apparently the Regional Spatial Strategy Panel Report indicated that this area was suitable for about 1,500 dwellings, and this number is reflected in the Broad Locations Report for Broad Location G6, which covers the site. The developers have undertaken a suite of baseline studies to inform development design, and I understand that the site could move forward to planning application quickly.*
88. *The site is largely agricultural and is surrounded by built development to the north and west. It is bounded by the M5 Motorway to the south east and the railway line to the west. The Stroud Road (A4173) runs close to and partly adjacent to its eastern boundary. The Broad Locations Report indicates that this area has varied landscape sensitivity although none of it seems to be highly sensitive. The report suggests that land to the north east closest to Robins Wood Hill and to the south west at Nass Farm is of medium sensitivity, with that to the far west being medium to low. In my judgement, landscape is not a bar to development.*
89. *Whereas the functional floodplain runs through the site along Daniels Brook, taking up about 7% of the site according to the developers, the masterplan shows it being used as well integrated green infrastructure. This, I am told, is integral to resolving flooding issues downstream in Gloucester and should be considered a benefit. The Broad Locations report also refers to the site's potential for flood betterment for downstream properties. On this basis, I accept this could be a benefit.*
90. *The Broad Locations Report suggests that there is poor transport connectivity to Gloucester City. Nonetheless, it points to Local Transport Plan proposals to expand the park and ride facility at nearby Waterwells, and the possibility of an additional rail station at nearby Huntsgrove. However, I understand that the Regional Spatial Strategy Panel did not find these facilities to be essential to allow development to proceed.*
91. *Stagecoach has indicated that a public transport service could be provided to the north of the site although large scale development to the south would put*



pressure on the existing local highway. Therefore, they say that some kind of north-south bus spine would be needed through the site, which should feed northwards into a bus advantage corridor to allow swift bus movements.

92. *The developers suggest that such a major development would be more than capable of improving access to sustainable transport and also emphasise the potential for a new rail station on site, which is shown in their masterplan. Whilst I have not examined any viability evidence for this, it seems to me that, in principle, such a large scale development should be capable of resolving these transport issues.*
93. *Overall, in my judgement, there are no insurmountable constraints to developing the Brookthorpe/Waddon site and it would make an appropriate allocation to help meet the housing requirements of Gloucester and the JCS area.*

2.42 This planning history demonstrates how the development of the land has been consistently frustrated by the plan-making process despite having received favourable assessments from independent Inspectors. With the RSS Panel and the JCS Inspector having both recognised the suitability of the site and its strategic development potential, it is important to now put in place measures to support the allocation and enable delivery of this sustainable extension to Gloucester.

b) Why the Land at Whaddon represents a suitable and sustainable location

2.43 In the Introduction to these representations, we contend that the Land at Whaddon is the most suitable and sustainable location for housing development within the Stroud District Council administrative area. To provide the context and justify this conclusion, we have assessed the site and proposed development against the sustainability objectives used in the SA Framework. In some cases this results in a different ‘score’ to that provided in the SA. The table below copies the score from the SA and against this provides the Savills alternative score for ease of comparison.

SA Objective	SA Score ²¹	Savills Score	Comments
SA 1: Housing	++	++	The SA explains that the site has been identified as having the potential to meet Gloucester’s unmet housing needs and is therefore given a ‘++’ score. We agree with the score but not with the limited justification provided in the SA. The site not only has potential to meet the needs of Gloucester but

²¹ Based on the Draft Local Plan Score from Appendix 7 of the SA (November 2019), pages 556-557.

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SA Objective	SA Score ²¹	Savills Score	Comments
			<p>also represents an entirely suitable and sustainable location to meet the needs of Stroud.</p> <p>The SA is not sufficiently refined to examine the market demand for, and therefore likelihood of, housing delivery on each of the proposed sites. Indeed, it simply assumes that all land allocated will deliver the housing consistent with the allocation policy. This simplistic approach ignores the variations in the housing market within Stroud and the inevitable risks that exist to delivery in some locations. Unlike certain other locations allocated within the Draft Plan there is (a) a demonstrable market demand for housing on the Land at Whaddon; and (b) a high level of confidence on the deliverability of the housing.</p>
SA2: Health	-/++	++	<p>We acknowledge that the site is not within 800m of a GP surgery, however, this appears to be an arbitrary distance and a misleading criteria against which to assess the 'sustainability' of a development location.</p> <p>According to the Royal College of GPs, an average patient will visit a GP around seven times a year²². For a journey that takes place so infrequently it is far less important for the development to be located as close as 800m from the destination, as it is for a destination such as a primary school, secondary school or places of employment.</p> <p>For this reasons we consider that this SA Objective should be measured against the inherent health objectives secured through the provision of open space, for which the location has been scored as a '++'.</p>
SA3: Social Inclusion	0	0	Agree that the development proposals will have no bearing upon this SA Objective.

²² 'The 2022 GP Compendium of Evidence', Royal College of General Practitioners - https://www.rcgp.org.uk/campaign-home/~/_media/Files/Policy/A-Z-policy/The-2022-GP-Compendium-of-Evidence.ashx

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SA Objective	SA Score ²¹	Savills Score	Comments
SA4: Crime	0	0	Agree that the development proposals will have no bearing upon this SA Objective.
SA5: Vibrant Communities	+	+	The land is greenfield as acknowledged in the SA, however, it will contribute towards the vibrancy of Gloucester City Centre and to other local community facilities, including those provided as part of the development. A score of '+' is therefore supported.
SA6: Services and Facilities	++	++	We agree with the conclusion in the SA that the Land at Whaddon should be scored '++' against this SA objective. There are a wide range of services and facilities accessible from the site on foot, bicycle or by public transport.
SA7: Biodiversity / Geodiversity	-/+?	+	<p>The land was scored as '-?' against this SA Objective in the original SA due to the proximity of the Robin's Wood Hill Quarry SSSI. This was amended to a '-/+?' in the Draft Plan SA on the basis that green infrastructure would be provided on site.</p> <p>Robins Wood Hill Quarry is designated a SSSI not for ecological reasons but because of its geological interest. The SSSI is approximately 1km (as the crow flies) from the northern most part of the proposed allocation and is a steeply sloping quarry with limited access due to the topography. It is a destination which may be visited by those who have an interest in geology but for the vast majority of residents it highly unlikely to be of any interest. For these reasons the likelihood of any harm to the SSSI as a result of increased visitor numbers arising from the development is negligible.</p> <p>In contrast to other locations proposed for development in the Draft Plan, including the New Community at Sharpness/Newtown, the Land at Whaddon is not constrained by this SA Objective. Given the importance of this objective and that in some instances it can represent a 'show stopper' constraint, we have scored the location as '+' as it (a) represents an opportunity to deliver a significant</p>

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SA Objective	SA Score ²¹	Savills Score	Comments
			quantum of housing in an unconstrained location; (b) the development as a whole will deliver a net gain in biodiversity; and (c) the onsite provision of Green Infrastructure which would act as a focus for leisure and recreation activities
SA8: Landscape / Townscape	-?	+?	<p>Development on the Land at Whaddon would ‘change’ the landscape. Whilst any change to the landscape is perceived to be harmful in a Landscape and Visual appraisal, for the plan-making process, it is unhelpful to assess potential development locations in this manner. The scale of development required by the plan must be identified and the Land at Whaddon is relatively unconstrained by the landscape implications of development compared to other locations. Indeed, as the SA acknowledges, the land is not covered by a landscape sensitivity assessment, nor would it effect the integrity or the setting of an AONB.</p> <p>It is also relevant to note that the site has been independently evaluated by inspectors / panels on two previous occasions. The SWRSS Panel concluded that development would “<i>enable the outlook from the viewpoint at Robins Wood (to the north of the land) to be adequately safeguarded without harmful encroachment into the wider countryside</i>”. Whilst the JCS Inspector advised that “<i>in my judgement, landscape is not a bar to development</i>”²³.</p> <p>In light of this we have scored the site as having a positive impact on this SA Objective. We have however also retained the ‘?’ as there is the opportunity through good quality design and masterplanning to create a new piece of high quality townscape which would beneficially contribute to the achievement of this objective.</p>
SA9: Historic Environment	-	?	There are no heritage assets within the site and the development would not therefore have a direct impact on heritage interests. As the heritage

²³ Inspector’s Interim Report on the JCS dated 26 May 2016, Paragraph 88

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SA Objective	SA Score ²¹	Savills Score	Comments
			<p>assessment²⁴ indicates, there are two assets within the locality, the setting of which could be impacted by the proposed development.</p> <p>At the plan-making stage, where it is necessary to make a judgement based upon a high-level understanding of the location and the policy requirements, it is not possible to determine whether the development would cause harm to the setting of off-site heritage assets and, if so, the magnitude of that harm. Indeed, the tools needed to come to a judgement on this matter, including a detailed assessment of Landscape and Visual impacts, are not available, nor is a development scheme against which harm can be judged.</p> <p>Whilst there are some parts of the wider land area within Policy G2 which could impact upon the setting of these assets, given the extent of the land available it would be possible to design the development in such a way that there is no harm to these assets.</p> <p>For these reasons it is in our view premature to come to a conclusion that the development would have a negative impact upon this SA objective. We have therefore scored the site with a ‘?’ against this objective.</p>
SA10: Air Quality	++/--	+	<p>The assessment of air quality in the SA very crudely assumes that housing development equates to more travel by car which in turn harms air quality. Whilst the ‘Accessibility Score’ is reported in the SA, we can find no explanation as to how this score has been derived.</p> <p>Notwithstanding the accessibility improvements which would be secured as part of a future development, it is important to note that the site is already well located to provide housing where future residents would have a choice of travel. Unlike other locations proposed for allocation in the Draft Plan, the site is already within close proximity</p>

²⁴ Heritage Impact Assessment for the Strategic Land Availability Assessment (May 2017)

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SA Objective	SA Score ²¹	Savills Score	Comments
			<p>of a wide variety of services and facilities. The likelihood of active and sustainable travel measures being taken up is therefore significantly greater than the more remote proposed allocations.</p> <p>The scale of the housing requirement is fixed and it is incumbent upon the authority to allocate the most sustainable locations to meet that need. The alternative to allocating the Land at Whaddon is to allocate land which is less well placed to deliver housing which is accessible by sustainable modes of travel. It is therefore necessary to score this SA Objective having regard to the potential alternatives. The site has therefore be scored as ‘+’ as in comparison with other potential allocations within Stroud it is extremely well located to provide access by non-car modes.</p>
SA11: Water Quality	0	0	Agree that the development proposals will have no bearing upon this SA Objective.
SA12: Flooding	--	++	<p>It is assumed that this score and the commentary that accompanies it is has been included in error as it is not accurate to say that “<i>a large proportion of this land falls within flood zone 3a and 3b</i>”.</p> <p>Indeed, this conclusion directly contradicts the conclusion of the JCS Inspector which states that “<i>Whereas the functional floodplain runs through the site along Daniels Brook, taking up about 7% of the site according to the developers, the masterplan shows it being used as well integrated green infrastructure. This, I am told, is integral to resolving flooding issues downstream in Gloucester and should be considered a benefit.</i>”</p> <p>As the Inspector has concluded, far from being a negative impact, the development would assist in resolving downstream flooding issues within Gloucester. In light of this we have scored the site positively.</p>
SA13: Efficient Land Use	--	++	The SA scores the Policy as ‘--’ against this objective on the basis that it is relatively large in size and greenfield. A similar score is given to all

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SA Objective	SA Score ²¹	Savills Score	Comments
			<p>of the large development proposals, albeit the ‘Garden Communities’ are suffixed with a ‘?’.</p> <p>We entirely disagree with the approach adopted in the SA and believe it is unhelpful and misleading to score all large developments as being harmful to the efficient use of land. There is a need to allocate land through the Local Plan which will deliver 12,800 dwellings by the end of the plan period. The combination of existing commitments and future allocations assess and include all sustainable and deliverable previously developed sites which are consistent with the plan strategy. Having taken into account this supply there remains a residual need for a significant quantum of housing on greenfield land.</p> <p>Housing development on greenfield land is not in and of itself inefficient use of land. On the contrary, it is using land for an alternative purpose and to meet a clearly identified need for which the authority has a duty to achieve. With this in mind we would argue that the development of the land for housing would deliver far greater sustainability benefits than its retention in agricultural use. Indeed, it would be more productive in all social, economic and environmental respects other than for the production of food.</p> <p>For these reasons, far from being an inefficient, we contend that housing development would enhance the efficient use of land. We have proposed an alternative score accordingly.</p>
SA14: Climate Change	0	0	<p>We do not disagree with the conclusion of the SA in relation to this site that the development would have a negligible effect on this objective. Based on the policies in the Draft Plan the development would neither contribute positively or negatively to climate change.</p> <p>We do however note that the SA objectives attribute a ‘+’ to the New Garden Communities on the basis that <i>“the delivery of development in line with Garden City principles is likely to help ensure</i></p>

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SA Objective	SA Score ²¹	Savills Score	Comments
			<p><i>that a wide range of local jobs are provided within easy commuting distance of homes”.</i></p> <p>The Land at Whaddon is already located within easy commuting distance of local jobs. Furthermore, the employment locations are established and many jobs already exist. In contrast the New Communities may have land that would be allocated for employment purposes but for the most part they are remote from employment opportunities. They are therefore reliant upon the market delivering new jobs if this objective is to be achieved.</p> <p>For the SA to provide an objective and fair comparison of the available alternatives it must do so on the basis of a reasonable interpretation of the background and context and not deal with the implications of the policies in isolation.</p>
SA15: Waste	0	0	We agree with the SA that the development would have a neutral impact upon this objective.
SA16: Employment	+	+	<p>The assessment of employment impacts in the SA is very simplistic. It is assumed that because the site is unlikely to have less than 10ha of employment land that it would score only a minor positive. In contrast, those larger developments such as the Sharpness New Community have been attributed ‘++’ on the basis that 10ha of employment is proposed.</p> <p>The way that this objective is scored in the SA does not explicitly take into account the contribution of housing development to employment from construction or the employment arising from the increase in the local population.</p>
SA17: Economic Growth	++?	++	The SA commentary against this Objective places considerable emphasis on the proximity of education opportunities. Whilst this does eventually have an impact upon economic growth, we would normally expect this assessment to be made under the analysis of services and facilities.



SA Objective	SA Score ²¹	Savills Score	Comments
			Notwithstanding, we agree with the conclusion that a strategic scale development in this location would result in a significant positive contribution to economic growth. We have however removed the question mark as it is not clear how or why this conclusion is uncertain.

- 2.44 Although the SA provided by LUC is generally positive and supports the potential for development of the Land at Whaddon we believe that the assessment understates the benefits and overstates the harm arising from the proposed development of Land at Whaddon. For the reasons explained we consider that our ‘scores’ represent a more accurate picture of the sustainability of the location and should be preferred.
- 2.45 Notwithstanding the scores, the SA objectives provide a helpful checklist against which to assess the potential impacts of the proposed development. For the reasons explained, we do not consider that the development would have any negative sustainability impacts. A development of the scale proposed could be designed so as to avoid or mitigate fully any harmful environmental impacts, such as flooding / drainage, ecology / geology, heritage and landscape / townscape. Allied to this, through the incorporation of an appropriate mix of uses including housing, education, local centre uses and employment, the site will score positively against many of the other relevant SA objectives.
- 2.46 The SA provides a guide only as to how the location performs against a wide range of sustainability objectives and does not attribute variable weight to the objectives. As such, it does not rule out a site where there is a ‘show-stopper’ constraint to development, nor does it attempt to highlight or inflate the importance of those objectives which will have the greatest importance in determining sustainability. For example, the proximity to a medical centre, a facility visited on average seven times a year, must be of lesser importance in determining the suitability of a location for development than the availability of a wide range of education or employment opportunities which are typically accessed on a day to day basis. Finally, the SA assumes that a development will be delivered in full accordance with the policy of the plan and no consideration has been given to viability or the deliverability of elements of the proposed allocations.
- 2.47 With this in mind it is important to highlight the relative merits of the Land at Whaddon when compared with the other proposed allocations in the Draft Plan:



- The site is in close proximity to a wide range of existing services, facilities, education and employment opportunities. In contrast other locations which are reliant upon new shops, schools, community facilities and employment being delivered as part of the allocation and new sustainable travel opportunities being delivered.
- Unlike the New Community at Sharpness, there are no constraints to development which it may not be possible to overcome.
- There are no major capital or revenue infrastructure costs required as part of the development in order to deliver a sustainable community. For example, travel by active modes and public transport into Gloucester City Centre can be secured through an extension of existing services. These services can be expanded incrementally as demand increases.

c) Why the land should be allocated within the emerging Local Plan

2.48 It would be ‘justified’ and ‘effective’ for the Local Plan to allocate the Land at Whaddon now, either as (a) a replacement for the existing New Community at Sharpness; or (b) as an additional allocation to meet the housing needs of Gloucester City.

Replacement for the existing New Community at Sharpness

2.49 Earlier in this section of the representations we highlight a number of specific soundness objections to the proposed Sharpness New Community. In line with these comments, we have significant concerns over the sustainability, viability and environmental impact of the New Community proposals.

2.50 The Land at Whaddon is significantly less constrained and, for the reasons explained earlier, a far more suitable and sustainable location for strategic scale growth. Indeed, even based upon the ‘scores’ provided in the SA, the Land at Whaddon scores more favourably overall than the New Community at Sharpness²⁵. Once the Savills scores are used in the comparison the difference between the two locations increases substantially.

2.51 As explained in the Introduction, SDC are under a legal obligation to “*exercise the [plan making] function with the objective of contributing to the achievement of sustainable development*”. It is only by allocating sustainable locations for development will the Local Plan have discharged this duty.

²⁵ See Summary Table 5.2 on page 106 of the SA.



- 2.52 It would be inconsistent with this duty if the Land at Whaddon was held back from allocation in the Stroud Local Plan purely and simply because it is also the most logical and sustainable location within Stroud to meet the future growth needs of Gloucester. Fast forward to the JCS review and the consideration of alternatives to meet the growth means of Gloucester City. Hypothetically, there is a possibility that the JCS Authorities prefer an alternative location to the north east or west of the city. We do not comment upon the likelihood or soundness of such a decision here as it is not a matter for the Stroud Local Plan, however, this would leave the most sustainable location within Stroud District not allocated at the expense of less sustainable locations. The Local Plan could not then be said to be prepared on the basis that it is delivering sustainable development.
- 2.53 The way to avoid this flaw is to switch the premise of the Land at Whaddon and the Sharpness New Community allocations. The former would be allocated for development in the Stroud Local Plan whilst the latter would be compared with the alternative locations within other neighbouring authorities which could contribute towards meeting the future housing needs of Gloucester City. This approach would lead to a sound and sustainable Local Plan for Stroud without removing the opportunity for the authority to contribute towards the housing needs of Gloucester City should it be deemed necessary to do so.

An additional allocation to meet the housing needs of Gloucester City

- 2.54 An alternative approach would be for SDC to make the decision now to allocate the Land at Whaddon as a contribution towards the housing needs of Gloucester. This would overcome the objections raised above and enable progress to be made expediently on the delivery of development.
- 2.55 A key question then for the soundness of the Local Plan is whether the decision to allocate would be premature in advance of the proper testing of all options through the JCS review. We do not consider that it would be. The relevant Gloucestershire authorities have clearly undertaken the work necessary to establish that the housing requirement for Gloucester City cannot be met within the authority area. This is based upon a housing requirement derived from the Local Housing Needs Assessment (also known as the Standard Method) and an understanding of the housing capacity within the administrative area based upon recent evidence²⁶ prepared to inform the Local Plan. Furthermore, the assessment of the alternative locations has been undertaken by LUC on behalf of the authorities and this forms part of the evidence base for the Draft Plan.

²⁶ See Gloucester City 'Housing Background Paper', September 2019 and the Gloucester City Strategic Assessment of Land Availability – both documents form part of the evidence base for the Pre-Submission City Plan.



2.56 There is therefore publicly available evidence demonstrating the need and suitability of the alternatives available to meet this need. As such, there is sufficient evidence available for the relevant authorities to come to a judgement. What would need to happen between now and the publication of the Submission Draft Local Plan is an agreement as to how the growth of Gloucester City should be accommodated. This is:

- a) necessary for the Plan to be ‘effective’ and therefore sound. Indeed, the ‘effective’ test in the Framework states that, for plans to be ‘sound’, they must be: *“based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground”* [our emphasis]; and
- b) precisely the purpose and function of the Duty to Cooperate (DtC).

2.57 The output of the DtC is a Statement of Common Ground between the relevant authorities. Planning Practice Guidance explains what Statements of Common Ground are and their content. The relevant paragraphs are copied below:

What is a statement of common ground?²⁷

A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate

What information will a statement of common ground be expected to contain about the distribution of identified development needs?²⁸

When authorities are in a position to detail the distribution of identified needs in the defined area, the statement will be expected to set out information on:

- a. *the capacity within the strategic policy-making authority area(s) covered by the statement to meet their own identified needs;*

²⁷ Paragraph: 010 Reference ID: 61-010-20190315

²⁸ Paragraph: 012 Reference ID: 61-012-20190315



- b. *the extent of any unmet need within the strategic policy-making authority area(s);
and*
- c. *agreements (or disagreements) between strategic policy-making authorities
about the extent to which these unmet needs are capable of being redistributed
within the wider area covered by the statement.*

2.58 It is perfectly legitimate, indeed we would argue, necessary for the Statement of Common Ground supporting the Stroud Local Plan to cover these matters for the geographical area covered by the Gloucester City Housing Market Area. In discharging the Duty to Cooperate, the authority should agree the proposed distribution of housing and the strategic locations required to meet this need. This does not need to wait for the JCS to be prepared and tested at Examination, these decisions can be made now and on the basis of the evidence available. The soundness of these decisions can then be assessed at the Examination of the Stroud Local Plan.

3. Core Policies

Core Policy DCP1

3.1 Core Policy DCP1 lists the measures by which the authority will seek to deliver Carbon Neutrality by 2030. There are a number of these measures which we wholly support and agree should form part of the first Core Policy of the Local Plan. There are others to which we object. We comment upon each of these in the order in which they appear in the policy:

- *“located where the form and mix of development itself or proximity to essential services and facilities minimises the need to travel”* – this is arguably the most important means by which the Local Plan can reduce carbon emissions. The plan-led system is designed to ensure that development is directed towards the most sustainable locations, whereas building regulations deal with the nature of the buildings and other forms of development. We wholly support this requirement for new development, albeit it is the role of the development plan to manage the pattern of growth and the fulfilment of this policy is arguably therefore an obligation upon the authority.
- *“designed to discourage the use of the private car, irrespective of fuel source, by prioritising in order of importance: walking, cycling and public transport to deliver the highest possible share of trips by the most sustainable travel modes”* – as with the first criterion, this is a clear objective and purpose of the planning system and an objective which we wholly support. One of our primary objections to the Draft Plan is that the Sharpness New Community simply does not accord with this important requirement. This not only results in an unsustainable form of development but it renders the allocation inconsistent with the first Core Policy of the Plan.
- *“designed to maximise green infrastructure to sequester carbon and to support local food production”* – this objective is also supported. The only caveat to our support is that the land allocated for development has been allocated for the purposes of meeting housing or employment needs etc. Whilst Green Infrastructure should be an important component of all developments, this should not be at the expense of development
- *“designed to follow the Energy Hierarchy principle of reducing energy demand, supplying energy efficiently / cleanly and using onsite low or zero carbon energy generation to meet standards which move progressively towards zero carbon, in terms both of regulated and unregulated emissions. Accordingly, new development should be constructed to achieve the highest viable energy efficiency and designed to maximise the delivery of decentralised renewable or low-carbon energy generation”* – we have explained elsewhere in these

representations why it is important for the Local Plan to focus on those matters which fall into the planning regime and does not stray into Building Regulations. The construction standards of new dwellings are part of Building Regulations and the policies of the Local Plan should not seek to deviate from the nationally imposed standards

- *“designed to reduce vulnerability to and provide resilience from the impacts arising from a changing climate whilst not increasing the potential for increased greenhouse gas emissions in doing so”* – planning for climate change through a cautious approach to the siting of new development is an important component of sustainability and we agree with this bullet point in the policy.

3.2 Overall, we support much of the approach proposed through Core Policy CP1. Whilst we understand why it would be desirable to set higher standards of energy efficiency for future dwellings, to avoid duplication this matter should be left to the Building Regulations regime.

Core Policy CP2

3.3 For the reasons we have explained elsewhere in these representations we object to the allocation of land at Sharpness for 2,400 dwellings during the plan period. We do not repeat these objections here but in summary these are:

- that Sharpness is not a suitable and sustainable location for a large scale New Community. The development would be inconsistent with the core aims and objectives of the plan to provide a framework for the sustainable growth of Stroud District;
- the viability of the proposed development and the key components that are crucial to the case that it represents a sustainable location have not been tested. We consider it to be highly unlikely that the New Community would be able to deliver the full range of benefits proposed; and
- the harm caused by the development to the Severn Estuary SPA has not yet been tested effectively for a conclusion to be drawn. Given the scale and proximity of the development to this internationally recognised habitat there will inevitably be harm. The authority must consider the alternatives available to meet the housing requirement on land which does not cause such harm.

3.4 The implication is that this allocation should be deleted from the plan and replaced by the allocation of Land at Whaddon.

Core Policy CP9

- 3.5 Policy CP9 requires the provision of 30% affordable housing on sites of 10 dwellings or over. We do not object to the principle of an affordable housing requirement articulated through policy, however, consistent with the provisions of paragraph 67 of the Framework, it is important that this is subject to viability testing in order that the implications of the various policy requirements can be examined at locations across the plan area.
- 3.6 In the absence of this evidence it is not possible to assess whether, and to what extent, the various policy requirements of the Draft Plan will impact upon the viability of development. This has broader implications than the soundness of the policies and allocations, as it could require the allocation of additional land if it is determined that certain locations are not viable.
- 3.7 This evidence must be produced as soon as possible and in any event prior to the publication of the Submission Plan. Since a policy requirement has been determined in the absence of the viability evidence, it is important that the Council adopt an open mind and ensure that the policies and allocations reflect the evidence once this has been produced.

Delivery Policy DHC7

- 3.8 Policy DHC7 provides the standards for the provision of new open space and recreation facilities which are to be applied to new residential developments. It is helpful that the Draft Plan sets out standards which can then be used in the masterplanning of residential development proposals. We do however have a number of concerns with the proposed approach in the policy.
- 3.9 First, there are a total of eight different open space typologies, each with individual standards. Whilst some of these are clearly distinctive, such as allotments and children's play provision, there are others which conceivably overlap. For example, it is not clear from the policy where the distinction arises between 'Amenity Green Space', 'Parks and Recreation Grounds' and 'Natural Green Space'. Furthermore, having such a large number of separate typologies is not only confusing but it is also unnecessary.
- 3.10 Second, planning obligations can only be used to secure land uses or financial obligations where they meet the statutory tests²⁹. The first of these tests is that they are "*necessary to make the development acceptable in planning terms*". It is only necessary to provide new open space where the development proposed would create a deficit in provision which needs to be remedied through the application proposals. The final paragraph of the Policy is in conflict with the statutory tests

²⁹ Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.



and should be changed to make it clear that provision will only be sought where there is a deficit within the local area.

- 3.11 Third, in addition to the eight open space typologies, there are a further four standards for built recreation facilities. Based on the prescribed standards and the scale of the allocations within Stroud District, it is highly unlikely that it would be practical or reasonable to require even the larger development allocations to make provision for the first three of these facilities on site. Rather than provide a standard in the policy, these are precisely the type of facilities which should be provided through CIL contributions where a demand exists. Facilities such as swimming pools and health & fitness studios are also typically provided by the private sector where market demand exists. It is not therefore necessary for the local authority to seek to provide these or to take contributions towards provision.

Delivery Policy ES1

- 3.12 Policy ES1 contains a large number of detailed measures to be required from new residential development proposals. Many of these measures are not directly relevant to planning and stray into the Building Regulations regime. The two are deliberately very separate processes, each with their own statutory and regulatory context and it is important that this distinction is maintained in the emerging Local Plan. Policy ES1 should be revised to remove any elements which are covered by Building Regulations.

Delivery Policy DES3

- 3.13 We object to draft Policy DES3 for three reasons. First, whilst heat networks may in theory provide one option to reduce carbon emissions from new development, they are only one option and are not necessarily the most appropriate and achievable across the plan area. Technology in this area is moving quickly and there may be more appropriate or sustainable means of achieving carbon reductions in heating other than through a requirement for Heat Networks.
- 3.14 Second, as explained in response to Policy DCP1, the energy efficiency and sustainability of buildings is a matter which the Government has very clearly stated should fall within the Building Regulations regime. The standards established through the Building Regulations are a fixed requirement for all new developments and it would unnecessarily duplicate this regime to also include a policy requirement for one particular solution.
- 3.15 For these first two reasons we do not consider the proposed policy requirement to be sound. It should therefore be deleted from the plan.



- 3.16 Third, and notwithstanding the above conclusions on the soundness of such a policy, the inclusion of policies such as DES3 on Heat Supply highlights the importance of viability testing the cumulative impact of policies within the Local Plan. Heat networks can be extremely expensive to install and maintain for the duration of a residential development. Without an evaluation of the costs of this alongside other policy requirements it is not possible to determine whether the policy is achievable.



Conclusion and Recommendations

There are many positive and components of the Draft Plan which we fully support and endorse. There are however some proposed policies and allocations which we do not support and do not consider to be 'sound'.

Of primary concern is the allocation of the New Community at Sharpness. We have a number of objections to this proposal which are detailed in Section 2 of these representations. In summary, we (a) do not consider the site to be in a sustainable location for strategic scale development, nor that the measures put in place in order to enhance sustainability will be deliverable or effective; (b) have significant concerns over its deliverability; and (c) do not consider that the environmental impacts of the development have been adequately tests. Each one of these reasons is sufficient for the allocation to be deemed 'unsound'.

A demonstrably more sustainable option is to allocate the Land at Whaddon. This land is not only sustainably located with a wide range of existing services, facilities, education and employment opportunities in close proximity but it is free from environmental constraints and not reliant upon the delivery of significant and costly infrastructure. Whilst the land has been identified under Policy G2 as a location which could provide housing to meet needs arriving in Gloucester, this does not mean that a decision over its development should be deferred. The land falls within the boundary of Stroud District Council and, as the most sustainable large-scale opportunity within the authorities area, should form a major part of the spatial strategy.