

January 2020

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# **Stroud Local Plan Review Emerging Strategy Paper November 2019**

Land at Whaddon Fields, Gloucester

Prepared by Black Box Planning  
on behalf of Taylor Wimpey Strategic Land



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### 1. Introduction

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- 1.1. These representations to the Stroud Local Plan Review 'Draft Plan for Consultation' (November 2019) have been prepared by Black Box Planning on behalf of Taylor Wimpey Strategic Land. The representations have regard to Taylor Wimpey's land interest at Court Farm, Whaddon. A Site Location Plan is attached at **Appendix 1**.
- 1.2. Taylor Wimpey welcome and support the preparation of the Draft Plan following consultation on the Emerging Strategy Paper in November 2018. The District Council is to be commended for conducting a review of the Local Plan in a timely and effective manner following the Local Plan adoption in November 2015.
- 1.3. Taylor Wimpey support the allocation of land at Court Farm, Whaddon (G2) within the Draft Plan as 'safeguarded' land to meet the future housing needs of Gloucester City. The intention to review the Draft Plan's strategy in terms of delivering the District's own housing requirement if Gloucester City does not require the proposed allocation at Whaddon is also supported. The Draft Plan provides a pragmatic approach to the Whaddon strategic site as a cross boundary site to be allocated with clear regard to the Duty to Co-operate. The land at Court Farm is sequentially the most sustainable strategic promotion site for helping to meet the substantial requirements for market and affordable housing in Gloucester City and Stroud District.

- 1.4.** These representations are accompanied by an updated illustrative masterplan for the site (attached at **Appendix 2**), which has advanced the proposals from the earlier Vision Document (August 2018), following further technical assessment of the site and dialogue with key stakeholders and consultees. Commentary on the updated masterplan in relation to the draft G2 Policy wording is provided below. At this juncture, land at Court Farm has capacity for at least 2,400 dwellings along with key infrastructure and ancillary mixed used development to include education provision and neighbourhood uses. Overall, the updated masterplan for the site is consistent with the allocation wording of the Draft Plan.
- 1.5.** The JCS authorities have embarked on the JCS review, with the next Regulation 18 consultation targeted for spring/summer 2020. Whilst the progress of the respective development plans will not necessarily align given that Stroud Local Plan Review will progress towards submission for examination in advance of the JCS, the ongoing dialogue between the authorities concerning unmet housing need from Gloucester City is critical to ensuring the soundness of the Draft Local Plan.
- 1.6.** These representations confirm that the land controlled by Taylor Wimpey continues to remain available, suitable and deliverable for development, as proposed by the G2 strategic allocation in the Draft Plan. Furthermore, these representations illustrate how the site is entirely consistent with the established spatial strategies for both Stroud District Council and the JCS. The conclusion that the site is an inherently sustainable location for housing development is underpinned by a substantial evidence base including the Council's Sustainability Appraisal (SA) which has been fully integrated to help inform the Plan's progress towards this Regulation 19 Consultation of the Draft Plan.

1.7. Throughout these representations, consideration is given to national planning policy requirements for plan-making as set out in Chapter 3 of the National Planning Policy Framework (NPPF), including paragraph 35 which stipulates the tests of soundness for examining local plans as follows.

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

1.8. The representations are also put forward in the context of NPPF Chapter 5, *‘Delivering a sufficient supply of homes’*.

## 2. Detailed Representations

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### Chapter 1: Setting the Scene

- 2.1.** From the outset of the Draft Plan there is clear emphasis regarding the duty to cooperate at paragraph 1.10 in order to ensure that strategic priorities are properly co-ordinated across administrative boundaries. The identification of this key undertaking in the introductory section of the Plan is appropriate and endorsed. This is particularly relevant to the Whaddon site located on the edge of Gloucester City, where clear dialogue and cross boundary working with the JCS authorities is essential for the Plan to pass the effective test of soundness.
- 2.2.** The Plan recognises that the District is increasingly becoming a commuting district, with many residents travelling out of the District daily for work. This characteristic of the District has emerged due to several factors, including the loss of traditional industries in recent decades and the market shift towards new employment development being concentrated at larger urban settlements (principally Gloucester and Bristol), which offer greater accessibility to strategic road and rail networks. In tandem with this, it is prudent to acknowledge the Draft Plan's aim for Stroud District to be carbon neutral by 2030 which includes a need to try to change travel behaviours in the District. In this context, the Draft Plan should look to maximise housing provision at locations with greatest accessibility to larger employment areas. For example, land at Court Farm, Whaddon, by virtue of abutting the Gloucester City urban edge provides one of the most sustainable locations for housing growth in the District. In this locality, it is realistic to envisage that the majority of everyday travel patterns will tend to require short trips to and from employment and key services and facilities. It therefore provides a realistic prospect of promoting modal shift towards more sustainable alternative modes of transport to the private car.

- 2.3. Indeed, this is reflected in the introductory section to the priority issues identified in the Draft Plan, which have helped to inform the spatial strategy and planning policies, where it states:

*“Ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by;*

- *Concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure;*
- *Creating new sustainable communities at locations where development can transport existing access to services and infrastructure;*
- *Concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth”*

- 2.4. Some of the priority issues identified in the Draft Plan most pertinent to the opportunity for delivering a residential-led strategic development at Whaddon Fields include:

- *“Addressing the high level of daily commuting out of and into the District, particularly out commuting to Bristol, Gloucester, Cheltenham and Swindon.” (priority issue 3)*
- *“Working with neighbouring authorities to meet the needs of the housing market area as a whole.” (priority issue 10)*
- *“Tackling the acute lack of affordable housing in the District.” (priority issue 11)*
- *“Ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development.” (priority issue 12)*
- *“Achieving a better transport system, to help reduce CO<sup>2</sup> emissions, with emphasis on limiting car use by extending the cycling and walking network and making improvements to public transport.” (priority issue 18);*

- *“Moving the District towards becoming Carbon Neutral by 2030 whilst adapting to the impacts of climate change and providing resilience for the future.” (priority issue 20);*
- *“Promoting high quality and locally distinctive design, incorporating where possible innovative, space efficient and flexible forms for modern living and working.” (priority issue 22);*
- *“Providing resilience to flood risk, releasing regeneration sites from the floodplain for housing and employment, and promoting natural flood management projects.” (priority issue 25);*
- *“Maintaining and improving the sustainability of our villages as places for living and working, by improving access to services, such as health and education, and jobs.” (priority issue 27);*
- *“Improving the provision of good quality sports facilities, to meet the District’s needs and increase participation in sports and physical activity, particularly among children and young people.” (priority issue 31);*
- *“Developing a Green Infrastructure network of public open space provision throughout the District, to increase accessibility, ensuring public open spaces are adaptable and capable of accommodating multiple uses.” (priority issue 32);*
- *“Achieving mixed, balanced and cohesive communities offering a sense of community identity and belonging, tolerance, respect and engagement with people from different cultures, background and beliefs.” (priority issue 33);*
- *“Working with neighbouring authorities to meet the housing, economic and infrastructure needs of the wider market area.” (priority issue 34); and*

- *Working with public health providers to ensure that health and wellbeing is central to the planning and design of new development, including the provision of well designed and insulated homes, the creation of vibrant places, and a network of open spaces with opportunities for play, enhanced biodiversity and flood risk resilience.” (priority issue 35)*

**2.5.** The priority issues identified by the Draft Plan are supported by Taylor Wimpey. Given the location and scale of the site, the proposed allocation at Whaddon is naturally positioned to make a meaningful contribution towards addressing these priority issues. The site provides the opportunity of providing a sustainable and well-designed new community on the Gloucester fringe with appropriate supporting infrastructure, amenity space and integration of key services and amenities. With particular regard to the objective of ensuring housing is located where it can be supported by services and infrastructure to create sustainable development; the proximity of the Whaddon site to existing infrastructure, services and amenities associated with the immediately adjacent Gloucester urban area provides an inherently sustainable location for housing development in accordance with this priority issue.

## Chapter 2: Making Places

- 2.6.** The strategic objectives set out in Chapter 2 of the Draft Plan are generally supported. However, Strategic Objective SO2 (Local economy and jobs) and SO4 (Transport and travel) should make some reference to working with neighbouring authorities as these objectives fundamentally transpire across the district boundaries into neighbouring authority areas. From the outset, the Draft Plan recognises the substantial existing out-commuting pattern by district residents. Whilst the planning system should strive to shape the built environment to change travel behaviour, it is unrealistic to think that there will be a seismic shift in either the commercial property market or travel behaviours to achieve self-containment within Stroud District. As such, these objectives should be clearly expressed as being cross boundary matters to be worked through in partnership with neighbouring authorities and key stakeholders (for example Highways England and Network Rail) to help promote the most sustainable development patterns.
- 2.7.** Strategic objective SO5 relates to climate and environmental limits. The overall objective is generally supported by Taylor Wimpey. However, the Council should seek stakeholder engagement through workshops or other means in order to understand what is required to ensure that the specific objective of *'securing zero carbon development through building design'* is both realistic and attainable. Does this mean that new buildings should be zero carbon in operation, or buildings should be zero carbon throughout the development process including construction? The strategic objective needs to be unambiguous in this regard.
- 2.8.** With regards to the introduction section to the development strategy in the Draft Plan, the clear recognition of Gloucester City as a neighbouring urban centre at paragraph 2.10 is welcomed, as such acknowledgement was lacking in the Emerging Strategy Paper (November 2018).

- 2.9.** The draft strategy's headlines (page 26) should include reference to the allocation of land at Whaddon as safeguarded land for the housing needs of Gloucester City. It should also include reference to the caveat set down later in the Draft Plan, whereby the site will be considered for meeting Stroud District's own housing needs in the event that Gloucester City/JCS authorities confirm that the site is no longer required for the City's needs. Although the point is made later in the Draft Plan, it is appropriate to make the status of the Whaddon site clear from the outset of the Plan, as potentially there are substantial implications for the Draft Plan in the event that the site was not taken up by Gloucester City. It is acknowledged that paragraphs 2.30, 2.31 and 2.32 address the Gloucester fringe context for the Draft Plan, but again this fails to provide the necessary clarity on the status of Whaddon in the Draft Plan, whereby it could come back into the mix for meeting the District's housing requirements. Taylor Wimpey continue to promote the site as a cross boundary strategic allocation which can contribute towards both the housing needs of Gloucester City and Stroud District. There are no insurmountable constraints to the delivery of development at Court Farm, including highway capacity on the local network. The implementation of key improvement schemes, which have been fully designed, including the St. Barnabas roundabout junction, provide appropriate mitigation to confirm the deliverability of the site within the plan period.
- 2.10.** Paragraphs 2.20 to 2.26 seek to provide residents of Stroud District with an understanding of what the Draft Plan means for where they live. The Draft Plan omits reference to the villages of Whaddon and Brookthorpe respectively in the context of the G2 Whaddon strategic site identified by the Draft Plan. The section requires revising accordingly so the Parish are acknowledged given the potential changes to their wider locality with development at Court Farm.

**2.11.** Paragraph 2.27 of the Draft Plan invites views on deliverability of allocated sites and the potential need for additional reserve sites to be identified should allocation not perform. In this context, Taylor Wimpey raise caution regarding the deliverability of the Sharpness and Wisloe Green allocations. Notwithstanding previous submissions by the respective promoters involved in these sites, there are question marks regarding market appetite for the scale of development proposed at Sharpness given its location and accessibility, as well as highways infrastructure provision for both sites and associated timescales. The Council should seek certainty from the promoters and relevant stakeholders that these sites are deliverable with technically robust and viable infrastructure provision identified. The recent demise of the JSP presents some uncertainty for the Development Plan review in neighbouring South Gloucestershire. This is relevant with regard to the M5 motorway junctions in the south of the District which will require a co-ordinated cross boundary approach to necessary highway improvements in tandem with strategic development sites. As such, strategic allocations in the District with any highway impact on the capacity at J.14 may be delayed. In this regard, the Council should be certain that it has sufficient evidence to provide comfort on realistic delivery timescales for these sites to ensure the development strategy of the Draft Plan is justified and effective.

#### ***Housing (2.5)***

**2.12.** Section 2.5 of the Draft Plan sets out the housing requirement for the District up to 2040. The calculation using the Government's standard methodology is supported (638 dwellings per annum = 12,800 dwellings over the 20-year plan period to 2040). The residual requirement of 8,000 homes (i.e. requirement less commitments) has not been interrogated by Taylor Wimpey for the purpose of these representations. However, it is assumed that the Council has applied the definition of deliverable set out in Annex 2 of NPPF and adopted a 'realistic assessment' of delivery trajectories as required by NPPF paragraph 72.

**2.13.** It is noted that Table 3 which calculates the total number of homes identified through allocations currently omits reference to the Whaddon allocation. It is understood that this is consistent with the 'safeguarded' status of the Whaddon allocation for Gloucester City's housing requirement. However, the Plan should be clear, and include the unmet housing need for Gloucester in the overall requirement. It is also suggested that the explanatory text alongside Table 3 should clearly explain the omission of the Whaddon site and that this is subject to review pending further joint working with Gloucester City Council. As stated later in the Plan, the strategic allocations could be reviewed to consider how the Whaddon site could contribute to the District's own housing requirement in the event that it is not required by Gloucester City.

#### ***Core Policy DCPO1: Carbon Neutral by 2030***

**2.14.** The principle objective and ambitious timetable for this policy is applauded by Taylor Wimpey and demonstrates that Stroud District is leading the way in seeking to address climate change considerations in plan making. The strategic site at Court Farm is entirely consistent with the criteria set out in the policy in so far as:

- The site will deliver homes in a location which minimises the need to travel including the promotion of self-containment including land identified for potential new schools, a local centre, recreational provision and a bus interchange facility.
- The proximity of the site to key infrastructure and amenities associated with the Gloucester urban area presents a realistic opportunity to promote non-car travel including bus, cycle and pedestrian movements.
- The Daniel's Brook corridor is embraced as the spine of the masterplan providing extensive green infrastructure at the heart of the new community in addition to allotments, gardens and community orchards to promote local food production.

- Constructing energy efficient homes which embrace opportunities for renewable energy where feasible.
- The masterplan is designed with particular regard to future flood risk potential arising as a result of climate change and seeks to reduce flood risk both on the site itself and downstream in Gloucester City.

**2.15.** It is not clear how all the strategic allocations, particularly Sharpness and Wisloe green, satisfy the DCP1 as these locations will be heavily reliant on travel, it is suggested principally by car, to higher order settlements for key services, amenities and employment opportunities.

#### ***Core Policy CP2: Strategic growth and development locations***

**2.16.** For the policy to be sound in terms of being effective and justified, the reference to the Whaddon strategic site in CP2 should be clear (as is the case at the Gloucester Fringe section of the Draft Plan), that the strategic growth and development locations are potentially subject to review pending further dialogue with the JCS authorities.

**2.17.** The policy should maintain a degree of flexibility in the event that should Gloucester City decide that either none, or only part-of, the Whaddon site is required for the City housing requirement, then Stroud District can duly consider how the Whaddon site (or part thereof) may play a role in delivering the District's own housing requirement.

#### **Core Policy CP5**

**2.18.** This policy is generally supported by Taylor Wimpey. However, Criteria 2 of the policy is vague and requires further explanation to understand what is mean by strategic sites being '*low impact in terms of the environment and the use of resources*'. By their nature, strategic development sites use large amounts of land resource, and are likely to have significant environmental effects, which can be either beneficial and/or adverse, and some of which can be offset by appropriate mitigation measures. In this context, the policy wording is very ambiguous as drafted.

**2.19.** Similar to the point raised at 2.14 above, it is not clear how all the strategic sites identified in the Plan can satisfy criteria 3 of CP5. This point is also pertinent to Delivery Policy E112 which relates to promoting transport choice and accessibility. By virtue of its inherently sustainable location, a residential strategic allocation on land at Whaddon can satisfy the general objective of Policy E112.

#### **Core Policy CP6**

**2.20.** This policy as drafted is generally supported by Taylor Wimpey. However, the policy should confirm that strategic allocations will be exempt from CIL owing to the substantial infrastructure costs associated with delivery of strategic scale development sites. Such clarification with the Draft Plan will aid the delivery of these sites through providing developers and promoters some clarity on their likely obligations to ensure sites are viable before the preparation of a planning application. In addition, the CIL charging schedule should be robust and agreed following participation of all relevant stakeholders through the preparation and examination stages of the CIL.

#### ***The Gloucester fringe: land at Whaddon***

- 2.21.** The Draft Plan provides a detailed overview of the G2 land at Whaddon site on pages 111 and 112. The content of the Draft Plan in this regard is supported by Taylor Wimpey. Paragraph 2.13 provides helpful and clear commentary regarding the status of the site in the Draft Plan, including the potential review on how the site might contribute to Stroud District's requirement in the event that the JCS authorities do not require the site or part thereof, which is lacking the earlier chapters as highlighted above.
- 2.22.** The detailed policy wording to G2 Land at Whaddon as set out on page 112 of the Draft Plan is supported by Taylor Wimpey. The requirement for a development brief to be prepared is also supported subject to a workshop session with the Council to understand the requirements and scope of the development brief.

#### ***Core Policies DCP2 (Supporting Older People) and CP7 (Lifetime Communities)***

- 2.23.** These policies require development proposals to increase the available range of housing options, promote active lifestyles and creating living environments which are accessible and cater for all age groups and disabilities including lifetime accommodation.
- 2.24.** Taylor Wimpey promote a mix of housing types and sizes on their development proposals and support these policy objectives.

#### ***Core Policy CP9: Affordable Housing***

- 2.25.** The policy objective for at least 30% provision of affordable housing across the District is supported by Taylor Wimpey. However, the policy should also provide some recognition to the NPPF minimum requirement for 10% affordable provision on major development proposals, and how this may be taken into account where abnormal infrastructure costs would otherwise prejudice the site delivery. In this regard, some clarification with regards to the degree of flexibility the Council will consider and in what limited circumstances would provide a more effective policy.

#### ***Delivery Policy HC3: Self build and custom build housing provision***

- 2.26.** Taylor Wimpey object to the 2% requirement of dwellings on strategic sites to be provided as self-build or custom plots. The Government promotion for custom self-build is related to significantly boosting the supply of housing with policy encouragement for as many forms of house building as possible (i.e. in a similar manner to the promotion of smaller sites, NPPF paragraph 68). By simply transferring the self-build provision to strategic sites, Policy HC3 will not have the intended objective of boosting housing supply. On the contrary, it will sterilise land within strategic allocations which should be made available for standard forms of housebuilding (market and affordable). NPPF paragraph 72 recognised that the supply of large numbers of new homes can often be best achieved through planning for larger scale development. In the case of the allocation at Court Farm, a policy requirement for 2% self-build or custom build plots will only hinder housing delivery on the site.

- 2.27.** The other driver for Government's promotion of self-build plots is to ensure policy provision is made for those wishing to commission their own home. However, such homes are normally bespoke in terms of site selection and design, which is not compatible within a strategic scale development site. There is no evidence to demonstrate demand for 2% self-build or custom plots on the strategic allocations. In the case of the Court Farm allocation for example, for the policy to be sound, the District would need to provide clear evidence of demand and viable take-up for 50 self-build or custom plots at this specific location. Without this clear evidence, the policy only hinders housing delivery on a strategic allocation.
- 2.28.** For the reasons above, the policy as drafted is unsound. The requirement for 2% self-build or custom build on allocated strategic sites should be deleted.

***Core Policy DHC7: Provision of new open space and building and indoor sports facilities***

- 2.29.** Taylor Wimpey reserve the right to comment further on these standards during the Plan's examination following further technical work regarding the masterplanning of land at Court Farm and testing regarding feasibility of these standards. Dialogue with other stakeholders is required, for example to confirm if school sports facilities can be made available for public use and contribute towards the policy requirements.

#### ***Delivery Policy EI12: Promoting transport choice and accessibility***

- 2.30.** The objectives of the policy are generally supported by Taylor Wimpey. The parking standards require an electric vehicle charging point (minimum 7kW and at least Mode 3 or equivalent) for every designated residential parking space. However, this policy provision duplicates the requirement for charging points which is coming into Building Regulations 2010. The Building Regulations will standardise the requirement for electric charging points in development. Therefore, the policy should promote the provision of electric vehicle charging points generally, but leave any specification to building regulations.

#### ***Delivery Policy EI19: Floorspace thresholds for Retail Impact Assessments***

- 2.31.** The policy should stipulate that there is no requirement for Retail Impact Assessments for local centres on strategic allocations. The provision of local centres on strategic development site promotes self-containment rather than competing with retail provision in town centres, and therefore strategically allocated local centres should be a confirmed exemption.

#### ***Delivery Policy ES1: Sustainable Construction and Design***

- 2.32.** The objective of the policy to achieve net zero carbon is supported by Taylor Wimpey but duplication or conflict with building regulations should be avoided. The policy seeks an overall minimum 35% reduction in emissions over Part L2013 Building Regulations and, a minimum 10% reduction in emissions over Part L 2013 Building Regulations in homes through fabric energy efficiency improvement, and residual emissions offset through a carbon footprint calculator.

**2.33.** The policy risks becoming out of date quickly with the emergence of new building regulations. Part L 2013 will be replaced by a revised Part L document this year. The revised document is currently out for consultation and proposes to increase the need to reduce carbon output from dwellings. The current proposal suggests a 31% reduction above Part L 2013. The changes proposed to Part L under consultation also recommend a 'fabric efficiency' led approach to carbon reduction. The policy should be amended to align with Government proposals currently being implemented through building regulations.

**2.34.** Taylor Wimpey request clarification on the methodology and viability evidence in relation to the Stroud District carbon offset fund as referred to in Policy ES1. It is assumed that the Council will undertake separate consultation on how such contributions are calculated and Taylor Wimpey reserve the right to comment further on the policy pending such consultation and also at the Examination of the Plan.

#### ***Delivery Policy ES2: Renewable or low carbon energy generation***

**2.35.** The provision of decentralised and low carbon energy schemes requires detailed viability testing as it will not be deliverable on all development schemes.

#### ***Delivery Policy DES3: Heat Supply***

**2.36.** The policy should not require provision of infrastructure on development schemes to connect to 'planned' heat networks, including connections 'currently unviable' when potentially there is no prospect of the plant ever being utilised. Such practice presents viability and uncertainty for development proposals. Further clarification regarding the application of this policy is required and Taylor Wimpey reserved the right to comment further at the Examination.

## 3. Conclusions

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- 3.1** The identification of land at Court Farm, Whaddon (site reference G2) as a strategic housing location which is safeguarded for meeting the needs of Gloucester City in the first instance, is supported by Taylor Wimpey. Taylor Wimpey also support the Draft Plan's stipulation and the site will be kept under review by the District Plan if the JCS authorities do not require the site to meet Gloucester City's housing needs. Taylor Wimpey control the vast majority of the land within the proposed G2 site.
- 3.2** The detailed wording of the proposed allocation at land at Whaddon including approximately 2,500 dwellings, local centre, education provision, bus interchange and green infrastructure is supported. The site has no insurmountable technical constraints to development. Whilst improvement works to the local highway network are required, the design of these improvement schemes has been tested and subject to wider transport modelling of the local highway network, there is no local highway constraint which would prevent or delay the delivery of housing on the site. The SA confirms the strategic allocation at Whaddon is a highly sustainable location for new development with great potential for promoting non car travel.
- 3.3** These representations raise a number of soundness issues which require revision of specific policies for the plan to successfully proceed to adoption. Taylor Wimpey support the Plan's progress towards examination and adoption.