



Stroud District Local Plan Review

Draft Plan Consultation Representations

On behalf of **Gloucestershire County Council** and **The Ernest Cook Trust**



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1 Introduction

1.1 Background

- 1.1.1 Stantec is instructed by Gloucestershire County Council (GCC) and the Ernest Cook Trust (ECT) to submit representations to Stroud District Council (SDC) in relation to the Draft Plan consultation. The comments are made on behalf of Gloucestershire County Council and the Ernest Cook Trust in their capacity as joint landowners of Land at Wisloe which is identified for a new settlement in the plan under proposed allocation PS37.
- 1.1.2 Land at Wisloe is described within the Draft Plan as an allocation for up to 1,500 dwellings, a local centre including shops and community uses, primary school(s), associated community and open space uses, and strategic green infrastructure and landscaping.
- 1.1.3 Since the previous “*Proposed Strategy*” consultation, GCC and ECT have engaged with SDC and other stakeholders to discuss the primary strategic and local considerations for sustainable development at the site. That dialogue has helped inform early design concepts alongside technical assessments at and around the site, the results of which have been shared with SDC and summarised within these representations. The technical assessments included, but were not limited to, assessment of local and strategic transport capacity and future improvement options, the potential acoustic environment, local landscape and visual assets, flood risk, and the natural environment.
- 1.1.4 A new settlement at Wisloe provides the opportunity to progress development in accordance with Garden Village principles and aspirations to be carbon neutral as proposals develop. How both aspects are implemented in real terms is important to understand.
- 1.1.5 GCC and ECT recognise the importance of having an up to date Local Plan for sustainable placemaking in accordance with paragraphs 15 and 33 of the NPPF and commend SDC for the proactive and positive approach taken in reviewing the plan.
- 1.1.6 It should be recognised that GCC has wider interests in the making of the Stroud Local Plan and these representations are only relevant in the respect of its land interest in Land at Wisloe (proposed allocation PS37).

Structure of these Representations

- 1.1.7 SDC states that the purpose of this consultation is to consider the following questions:
- i. What level of support is there for the Council’s preferred strategy for meeting Stroud District’s future growth and development needs?
 - ii. Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?
 - iii. Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?
- 1.1.8 These representations look at each of SDC’s questions in turn.

2 Representations

Q1. Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?

- 2.1.1 In relation to Wisloe, GCC and ECT are generally supportive of the proposed strategy, subject to the comments and recommended changes within these representations. The proposed strategy would provide a balanced approach to housing and employment growth in locations which provide the greatest opportunity for sustainable development through employment and transport linkages in combination with planned infrastructure investment and improvements. These include junction improvements at Junctions 12 and 13 of the M5 and other interventions identified in the Gloucestershire Joint Transport Plan (2015) and the Sustainable Transport Strategy (2019).
- 2.1.2 Through adopting a 'hybrid' development strategy (pg25), the Draft Plan effectively identifies the separate role and function of settlements and their respective future growth pressures and opportunities. A robust approach has also been taken to apportioning housing growth based on existing and future employment, services and housing needs in accordance with paragraph 23 of the NPPF. Strategic policies are then effectively broken down into site allocations which will be subject to site specific development management policies still to be formulated and considered at the Pre-submission Consultation.
- 2.1.3 As GCC and ECT's agents, we support the level of contingency incorporated into the Draft Plan when using the current standard method for housing need and consider that the Draft Plan is positively prepared in its approach for ensuring enough sites are allocated to deliver for housing needs over the 20-year plan period.

Housing Needs

- 2.1.4 The Gloucestershire Housing Needs Assessment (ORS, 2019), considers it sensible to use 2019 as the base year to measure the growth over a 10-year period and on this basis the Council has correctly applied the standard method calculations to identify an annual average. Applying this to a 20-year period leads to 12,760 dwellings, which SDC has sensibly rounded up to 12,800 in the Draft Plan.
- 2.1.5 It is noted that the stage 3 cap applied within the housing needs calculation (40% above existing housing requirement) only applies until November 2020 as it will be then beyond five years since the adoption of the current Stroud Local Plan. Given that the current programme envisages a pre-submission consultation in Autumn 2020, it is very likely that the Plan will be submitted after the November 2020 deadline. Given that this is the most important and formal stage of plan making, the draft Plan is likely to generate significant representations and take a few months to evolve ready for formal submission. Consequently, if the Plan is submitted after that date the cap will change, and the standard method number will become 652 dwellings per annum, which equates to 13,040 new homes required over the 20-year plan period.
- 2.1.6 SDC has identified a number of sites, the capacity of which exceeds both the minimum baseline standard method need of 12,760 dwellings, plus the additional year, and any increased need from the removal of the cap (13,040 dwellings). In total, the Council is seeking to identify a supply of 10,075 dwellings in addition to existing deliverable commitments of 5,223 dwellings, through a combination of allocations and a small sites allowance. This means that SDC is identifying approximately 15,300 dwellings in its emerging Local Plan, which provides flexibility and contingency of approximately 17% to deal with unforeseen changes in the numbers generated by changes to the standard method up to the submission of the Local Plan.

- 2.1.7 The quantum of emerging draft allocations should be retained and taken forward to ensure that there is enough contingency in the land supply. The figures should be kept under review to ensure that this flexibility is maintained to deal with the changes that are likely over the next few months with the release of new 2018-based sub-national population and household projections and expected government led changes to the standard method itself to achieve an uplift in housing delivery nationally from 266,000 dwellings (the current standard method based figure) to 300,000 dwellings a year by the mid-2020s.

**Q2. Any additional issues or constraints relating to the proposed sites?
And how should specific constraints, needs and opportunities be
reflected in the final site allocation policies?**

- 2.1.8 Land at Wisloe (PS37) provides the opportunity to deliver mixed housing and employment uses incorporating new community and service infrastructure. This includes new school(s) and retail provision as well as improvements to pedestrian, cycle, and bus access, and facilities at Cam and Dursley Railway Station.
- 2.1.9 GCC and ECT commissioned a series of baseline technical assessments to support the background work undertaken by SDC in allocating the site for future development, principally through the Sustainability Appraisal (LUC, 2019) and Sustainable Transport Assessment (AECOM, 2019), and inform the future master planning of the site. These findings are summarised as follows.

Agricultural Land

- 2.1.10 A field surey was undertaken in September 2019 to examine soil profiles by using standard soil survey methods. The Agricultural Land Classification of the site is 3b (moderate quality agricultural land). It therefore does not qualify as the 'best and most versatile agricultural land' (NPPF 2019).

Heritage

- 2.1.11 The likely archaeological resource within the site is not anticipated to be of such significance that it would preclude the development of the site. Based on the archaeological potential of the site, a programme of archaeological evaluation works is recommended to support future development in order to ascertain the nature and extent of such remains, and better establish their heritage significance. This approach has been agreed with the County Archaeologist.

Ecological Constraints and Opportunities

- 2.1.12 The site represents a typical greenfield location that has been farmed for crops and livestock. Measurable net gains (in line with the NPPF) over and above what is there now can be achieved as a result of carefully planned and managed development which responds, for example, to hedgerows, trees, dark corridors and the introduction of ponds.
- 2.1.13 The main potential impacts are in relation to EU protected species that reside outside the site. The site falls within 7.7 km of the Severn European Marine Site (EMS). Any impacts to the EMS can be addressed through Stroud District Council's Severn Estuary Recreation & Mitigation Strategy (SE RAM). There are a number of hedgerows on site, the impact upon which will need careful consideration and if necessary, mitigation. On-site survey work will be needed in relation to bats and birds.

Highways and Transport

- 2.1.14 Initial work has been undertaken to assess the constraints and opportunities associated with the site, which has informed the preparation of a potential site access strategy. Highways England and GCC, as the relevant highway authorities, have been consulted at this early

stage to discuss the emerging access strategy and the approach to assessment of potential impacts on the strategic and local road network. The location of the site provides the opportunity for enhanced pedestrian and cycle connections across the motorway and railway line to connect Cam and Dursley to Slimbridge. The existing local public transport network means that several options are available to provide a comprehensive public transport strategy for the development. This transport work and findings align with SDC's Sustainable Transport Assessment (AECOM, 2019).

Flood Risk and Surface Water

- 2.1.15 The Environment Agency's 'Flood Risk from Surface Water' mapping indicates that the majority of the site is at "Very Low" risk of surface water flooding, although there are some areas with risk ranging from "Low" to "High". These are likely to be associated with localised low-lying areas and field ditches across the site. The surface water drainage strategy will take account of these areas in its design.
- 2.1.16 Whilst the site itself is shown to be at a relatively low risk of flooding, it is understood that Slimbridge and Cambridge downstream of the site regularly experience flooding. Therefore, the surface water drainage strategy for the proposed development at the Land at Wisloe site will need to seek to not adversely affect flood risk downstream and, where opportunities are available, seek to improve flood risk for the downstream communities. Current local planning policy is to limit discharge from developments to match the equivalent greenfield runoff rate but early discussions with the Lead Local Flood Authority indicates that a greater restriction would be beneficial. Therefore, the surface water drainage strategy will be developed to restrict surface water discharge from the site at or below the existing greenfield runoff rates.
- 2.1.17 A new settlement at Wisloe provides the opportunity to develop an innovative approach to flood risk and surface water solutions to accord with measurable net gains in biodiversity and in a consistent manner with the approach of the Environment Agency.

Landscape and Visual Considerations

- 2.1.18 The site has a medium landscape sensitivity and a medium to low visual sensitivity. It lies within a settled landscape character of the Severn Vale. The Cotswolds AONB lies approximately 3.8km to the east of the site. The site can be seen in long-distance views from elevated views on the Cotswolds Escarpment, as part of the low-lying settled landscape.
- 2.1.19 The low-lying landform combined with the layers of hedgerows with hedgerow trees means there are few locations that enable views of the full area of the site. Proposed development at the site is recommended to be set around an integrated green blue infrastructure framework, which will be in keeping with the existing landscape and settlement character and will help to break up the mass of new built form when seen from the wider landscape and long-distance views. A series of green-blue infrastructure principles have been recommended for inclusion as an inherent part of any proposed development.

Acoustic Considerations

- 2.1.20 The noise assessment addresses the noise climate affecting the site, specifically road, rail and commercial noise. Mitigation measures will be required to control external noise at the site including construction and suitable ventilation provisions. With respect to industrial noise, a noise control barrier along the industrial boundary will be required.

Other Allocations

- 2.1.21 Sites allocated within the plan should be considered as deliverable within the plan period, incorporating estimates of the cost of infrastructure improvements which are reasonably reliable and necessary to make them acceptable in planning terms. This is not as much a consideration for sites in the proximity of existing transport hubs such as Wisloe.

- 2.1.22 The Council should ensure that the delivery of those sites that are allocated is achievable in accordance with the proposed housing trajectory.

Q3. Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?

- 2.1.23 In relation to their interest at Wisloe, GCC and ECT are generally supportive of the policy approach taken in the Draft Plan subject to the following comments and changes.

Core Policy CP2 – Strategic Growth and Development Options (support)

- 2.1.24 The inclusion of Wisloe within the policy for 1,500 homes and 5ha of employment is supported. The sustainable location of the site and its ownership by GCC and ECT brings the opportunity to deliver sustainable and aspirational development which provides for new and established communities.

Core Policy CP3 – Settlement Hierarchy (support subject to changes)

- 2.1.25 GCC and ECT understand why Land at Wisloe has not been included within the settlement hierarchy. However, within the lifetime of the Plan it will perform its own role and function within the hierarchy as an established settlement. Therefore, for consistency, the policy and/or supporting text should be altered to acknowledge its future role as a 'Tier 3a Accessible Settlement with Local Facilities'. This will also ensure a consistent approach across the text of the Plan.

Core Policy CP5 – Environmental Development Principles for Strategic Sites (support subject to changes)

- 2.1.26 GCC and ECT support the inclusion of this policy, however criteria numbers one and two do not provide a reference to a measure in the policy for a which a developer can demonstrate accordance to. If the measure is included elsewhere in the policy, the Plan, or national guidance, it should be referenced as such to avoid ambiguity for developers and decision makers.

Draft Site Allocation PS37 – New Settlement at Wisloe (support)

- 2.1.27 GCC and ECT support the inclusion of a new Settlement at Wisloe within the Stroud Local Plan.
- 2.1.28 The number of dwellings included within the Plan is set to achieve, at a minimum, the level of housing need established for the local planning authority area (paragraph 35a of the NPPF).

Delivery Policy DE11- District-wide mode-specific strategies (support subject to change)

- 2.1.29 In relation to Wisloe, while GCC and ECT welcome and actively encourage the approach embodied by this policy, it is unclear what the policy and measurable outcomes are. Instead it reads like supporting text to introduce the SDC's ambitions to promote sustainable transport choices in the district. We therefore suggest that the wording should be reformatted to read as a policy.

Delivery Policy ES1 – Sustainable construction and design (comment)

- 2.1.30 In relation to Wisloe, GCC and ECT support the aspirational nature of this policy. However, as their agent, we would suggest that the viability testing of enhanced building requirements in ES1(1) be tested at the plan making stage alongside other viability considerations such as infrastructure requirements and affordable housing. This approach will help evidence that the

Plan is deliverable at examination in accordance with both paragraph 16b of the NPPF and up to date guidance on viability in plan making in national planning practice guidance.