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**REGULATION 18
REPRESENTATION- STROUD
LOCAL PLAN REVIEW**

**REPRESENTATIONS ON BEHALF
OF NEWLAND HOMES LIMITED**

20/12/2019

REGULATION 18 REPRESENTATION STROUD LOCAL PLAN REVIEW

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Prepared for

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1. INTRODUCTION	3
2. POLICY BACKGROUND	4
3. CHANGES TO ADDRESS ISSUES RAISED	6

APPENDIX 1 SITE LOCATION PLAN

1. INTRODUCTION

- 1.1. Newland Homes Limited (Newland) controls land south of Grange Road, within Stroud District and adjoining Gloucester City Council boundary and in very close proximity to the recently approved site for 250 dwellings, being developed by Persimmon which lies to the west. The site extends to 2.2 ha/5.5 acres with capacity to accommodate some 90 dwellings (See **Appendix 1**).
- 1.2. The Whaddon site was identified as the most sustainable location of all the south Gloucester fringe sites identified in the Issues and Options consultation.¹
- 1.3. In addition, the site is safeguarded as part of a wider allocation being promoted by Taylor Wimpey Homes for 2,000 dwellings to meet the future housing needs of Gloucester City as identified in Policy G2. It is unconstrained, with good public transport links and available for development and although it could be considered as part of the wider allocation, initial assessments indicate that the site could be brought forward as a stand-alone site providing its own highway, drainage and service infrastructure.
- 1.4. These representations rely upon the Stroud District Local Plan Review-Draft for Consultation November 2019 [SDLPR], its evidence base and related documents including the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- 1.5. The following sections put forward suggested changes to improve the SDLPR as it progresses towards submission to the Secretary of State.

¹ Stroud District Local Plan Review Emerging Strategy Consultation Report – Part Two
November 2019 - page 47

2. POLICY BACKGROUND

- 2.1. The SDLPR is a comprehensive local plan combining strategic policies and detailed allocations. Newland notes that the strategic housing requirement is derived from the Gloucestershire Local Housing Needs Assessment 2019 [GLHN] prepared by Opinion Research Services, in accordance with the advice in the NPPF (paragraph 60).
- 2.2. The current NPPF (February 2019) altered the definition of affordable housing need to include those households that aspire to buy but cannot afford to do so. Newland notes that the GLHN identifies some 4,630 households in Stroud District and 6,370 households in Gloucester City that would fall within this category representing 54% and 72% respectively, of the LHN based on the standard methodology. The GLHN is clear that it is a policy decision as to whether and how those additional needs are met. Newland notes that the SDLPR proposes that generally 30% of housing is provided as affordable housing (Policy CP9).
- 2.3. However, it is unclear as to how the identified need for affordable housing for those who aspire to home ownership, but cannot afford to, is to be met.
- 2.4. Based on the above, Newland suggests that additional clarity be provided as to how the need for affordable home ownership is to be met.
- 2.5. The GLHN also sets minimum figures for the other Gloucestershire authorities (Gloucester City, Cheltenham Borough, Tewkesbury Borough, Cotswold District and Forest of Dean District). The strategic housing requirement for Gloucester City, Cheltenham Borough, Tewkesbury Borough is dealt with through a Joint Core Strategy, adopted in December 2017 (JCS).
- 2.6. During the examination of the JCS it became clear that meeting Gloucester's future housing needs will also rely on provision within Stroud District.
- 2.7. JCS Policy REV1: Gloucester and Tewkesbury Housing Supply Review recognises the issue of housing supply for Gloucester by requiring an immediate review on the adoption of the JCS. Progress to date is limited to an Issues and Options consultation which was completed in January 2019.
- 2.8. In addition, Table SP2a in the JCS identifies further potential of 1,518 dwellings be identified through the Gloucester City Plan and Newland has raised concerns that this is not achievable with consequential impacts on Gloucester City's housing land supply.
- 2.9. The JCS sets the principles for meeting unmet needs, in that they should be met where they arise. On this basis Newland considers that the identification of their land south of Grange Road within Policy G2 is essential to the proper planning of the area, without the need to rely on a future review of the JCS, the timetable for which, remains uncertain.

- 2.10. Based on the above Newland therefore suggests that Policy G2: Land at Whaddon be amended to allow for land to come forward under a memorandum of understanding with Gloucester City Council and that any shortfall in land supply for either authority be met at this location. This could be through the release of the site at **Appendix 1** as part of a staged approach should the requirement be higher than 90d dwellings.
- 2.11. Newland notes and broadly supports the SDLPR priority to move the District towards becoming Carbon Neutral by 2030 and promoting development that reduces the District's carbon footprint. Core Policy DCP1 goes further in that it states that the District will become Carbon Neutral by 2050, setting five requirements for all new development seeking to reduce the need to travel, design to discourage the use of the private car, maximising green infrastructure, design to follow the energy hierarchy and design to reduce vulnerability to and resilience from the impacts of climate change.
- 2.12. However, Newland feels that the emphasis on location, non-car transport and low carbon energy sources does not support the selection of the strategic development location of Wisloe Garden Village (Policy PS37). For example, there is no evidence to demonstrate that a safe pedestrian/cycle route to Cam/Dursley Station can be achieved due to the width restriction of the railway bridge on the A4135.
- 2.13. Based on the above Newland therefore suggests that Policy PS37 is inconsistent with Core Policy DCP1 and the allocation should be re-considered.
- 2.14. In addition, Newland notes that there is no specific policy to encourage the development of low carbon homes rather than the broader considerations of travel and energy sources.
- 2.15. Based on the above Newland therefore suggests that a new policy should be included in the SDLPR to encourage low carbon home developments.

3. CHANGES TO ADDRESS ISSUES RAISED

3.1. As set out above, the Stroud District Local Plan review November 2019 is largely supported. In order to address the issues identified Newland considers that:

- a. land south of Grange Road as identified at Appendix 1, be identified to meet the needs of Gloucester under a memorandum of understanding with Gloucester City Council;
- b. additional clarity be provided as to how the need for affordable home ownership is to be met;
- c. Further consideration be given to the allocation of land at Wisloe in order to demonstrate compliance with Core Policy DCP1; and
- d. a new policy be included in the SDLPR to encourage low carbon home developments.

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