

REPRESENTATIONS TO THE STROUD LOCAL PLAN REVIEW – DRAFT PLAN FOR CONSULTATION (NOVEMBER 2019)

SITES IN STROUD DISTRICT

ON BEHALF OF ROBERT HITCHINS LTD

Prepared by: Sarah Hamilton-Foyn

Pegasus Group

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT

T 01285 641717 | **F** 01285 642348 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

©Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

Representations are submitted on behalf of Robert Hitchins Ltd to the Stroud Local Plan Review - Draft Plan for Consultation (November 2019). There are no specific questions included in the consultation, however our response focuses on the three bullet points but are set out following the structure of the Draft Plan:

- * Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?
- * 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?
- * Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?

With respect to the Cluster Areas and sites:

The Stonehouse Cluster:

- PS19a – Land West of Stagholt Farm (Northwest of Stonehouse)
- STO 006 – Land off Bristol Road, Stonehouse
- Land south east of Nupend

Cam & Dursley Cluster:

- PS21 – Land adjacent to Tiltdown House, Cam
- PS24 – West of Draycott

Severn Vale Cluster:

- PS46 – Land west of School Lane, Whitminster
- WHI 001 – Land east of School Lane, Whitminster
- WHI 007 – Land at Grove End Farm, Whitminster

Representations area also made on the Sustainability Appraisal that accompanies the consultation.

Pegasus Group

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT

T 01285 641717 | **F** 01285 642348 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

©Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

CONTENTS:

Page No:

1.	SETTING THE SCENE – WHY DO WE NEED A PLAN?	1
	Key Issues	3
2.	MAKING PLACES – THE DEVELOPMENT STRATEGY	6
	Vision to 2040	6
	Strategic Objectives	6
	An introduction to the development strategy	6
	Stroud District’s Housing requirement up to 2040	11
	Stroud District’s housing distribution up to 2040	14
	Local Economy and Jobs	23
	Core Policies	25
3.	MAKING PLACES – SHAPING THE FUTURE OF STROUD DISTRICT	30
	The Stonehouse Cluster	30
	Cam and Dursley	36
	The Severn Vale - Whitminster	39
4.	HOMES AND COMMUNITIES	48
	Core Policies	48
	Core Policy CP7 Lifetime communities	48
	Core Policy CP8 New Housing Development	48
	Core Policy CP9 Affordable Housing	49
	Delivery Policies	49
5.	ECONOMY AND INFRASTRUCTURE	51
	Employment Growth and strategic employment needs	51
	Travel and Transport	51
6.	OUR ENVIRONMENT AND SURROUNDINGS	53
7.	DELIVERY AND MONITORING	55

APPENDICES:

APPENDIX 1: MOVEMENT CORRIDORS FROM THE STROUD SUSTAINABLE TRANSPORT STRATEGY (NOVEMBER 2019)

APPENDIX 2: POSITION STATEMENT - LAND AT GROVE END FARM, WHITMINSTER

APPENDIX 3: LANDSCAPE AND VISUAL APPRAISAL PS19A NORTHWEST OF STONEHOUSE

APPENDIX 4A: WIDER CONTEXT PLAN FOR PS19A NORTHWEST OF STONEHOUSE

APPENDIX 4B: DEVELOPMENT FRAMEWORK PLAN NORTHWEST OF STONEHOUSE INCLUDING SCHOOL SITE – JULY 2019

APPENDIX 5: LAND SOUTH OF BRISTOL ROAD, STONEHOUSE (INCLUDING INDICATIVE PLANS AND A HERITAGE ASSESSMENT) - AUGUST 2019

APPENDIX 6: LAND SOUTH EAST OF NUPEND

APPENDIX 7: LAND ADJACENT TO TILSDOWN HOUSE - MASTERPLAN

APPENDIX 8: LAND WEST OF DRAYCOTT, CAM - PRELIMINARY ILLUSTRATIVE
MASTERPLAN

APPENDIX 9: LAND WEST OF SCHOOL LANE, WHITMINSTER

APPENDIX 10: LAND EAST OF SCHOOL LANE, WHITMINSTER

APPENDIX 11: REPRESENTATIONS BY PIONEER ON POLICIES CP7, CP8, CP9 AND HC3

1. Setting the Scene – Why do we need a Plan?

- 1.1 It is noted that paragraphs 1.2 and 1.3 state that the development strategy is articulated through a number of “Core Policies” and that the Local Plan also includes more detailed “Delivery Policies” for managing and directing development, as well as specific site allocations, area designations, protections and planning controls.
- 1.2 As currently presented it is not necessarily clear which policies are strategic and which policies are non-strategic. This may well be a simple presentation issue that can be rectified for the next stage of the Plan.
- 1.3 Paragraph 17 of the NPPF (February 2019) states that the development plan must include **strategic policies** to address each local planning authority’s priorities for the development and use of land in their area.
- 1.4 **Non-strategic policies** should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development.
- 1.5 Paragraph 20 of the NPPF sets out what strategic policies should cover in the Plan.

“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision¹² for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

- 1.6 Paragraph 21 then states that Plans should make it explicit which policies are strategic. Where a single plan is prepared, as in the case of Stroud, the non-strategic policies should be clearly distinguished from the strategic policies.

¹² In line with the presumption in favour of sustainable development.

- 1.7 Paragraph 21 also states that strategic policies should be "*limited to those necessary to address the strategic policies of the area (and any relevant cross boundary issues).*"
- 1.8 Paragraph 28 of the NPPF states that non-strategic policies "*can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.*"
- 1.9 The fact that the Council are preparing a complete review of the adopted Local Plan is welcomed.
- 1.10 Paragraph 1.10 refers to working collaboratively with other bodies to ensure that strategic priorities are properly co-ordinated across administrative boundaries.
- 1.11 It is noted that in the Committee report of 24th October 2019 at paragraph 3.5 that the Local Housing Need Assessment (Consultation Draft – October 2019) has established the housing requirements for 2040/1 and as a result Gloucester City Council has informed neighbouring authorities that it will not be able to accommodate its housing needs due to a lack of available land in the administrative area of Gloucester City. As yet this has not been tested as the current plan in preparation is to 2031 in line with the JCS. However, it is clear that some future needs will need to be accommodated elsewhere and that the interim conclusions of assessment work are that areas with the most potential to accommodate some of Gloucester's unmet needs are close to where they arise in Gloucester and therefore include land within Stroud District. Depending on the amount of unmet need that needs to be accommodated will also affect the strategy for meeting Stroud's own housing needs.
- 1.12 The strategy and strategic policies will need to make it clear if any sites on the Gloucester fringe are to meet any unmet needs arising in Gloucester City. The consultation version of the Stroud Local Plan currently states on page 111 that an assessment of potential alternative sites to meet Gloucester's long terms housing needs is currently being carried out. Both Land at Whaddon and South of Hardwicke have been included in the assessment, together with other sites both within and on the edge of Gloucester. The next version of the Plan will then identify the best performing site(s) for potential allocation. It is noted that the current indications are that Whaddon is among the best performing sites and is

therefore included as a “safeguarded” site to meet the future needs of Gloucester City, should it be required for approximately 2,500 dwellings etc.

- 1.13 However, it is also noted that the Plan states in paragraph 2.13 in the Gloucester fringe section of the Plan (page 111) that

“if the process ultimately concludes that a site at Whaddon is not required to meet Gloucester’s immediate needs, then there is potential to review how the land might contribute to Stroud’s own needs and whether there is any merit in bringing it into the Stroud District Local Plan with consequential changes to the strategy.”

- 1.14 Pegasus would object to land at Whaddon coming forward to meet Stroud’s needs, as such an approach would result in approximately 4,450 dwellings in the Gloucester fringe meeting Stroud’s needs, i.e. 55% of the residual housing requirement as currently proposed. Stroud’s needs should be met across the district at the most sustainable locations where it’s needs arise.

Key Issues

- 1.15 It is noted that the Draft Plan identifies six priority issues (as opposed to the top five key issues), moving the district towards becoming Carbon Neutral by 2030 is top of the list.
- 1.16 It is considered that the priority issue “ensuring new housing development is located in the right place.... should refer to housing and employment development being located in the “right place” supported by the “right” services and infrastructure to create sustainable infrastructure; as the bullet points under this issue refer to both housing and employment development. Alternatively, the issue should refer to “development” as any development should be located in the “right place” supported by the “right services” in order for it be sustainable and meet the objectives of the NPPF.
- 1.17 Pegasus object to the way in which the Local Plan review intends to address the Issue – “*Ensuring that new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development*”. It is considered that meeting the housing needs of the district is not well served by proposing a major allocation at Sharpness. Such an approach is not consistent with concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure; neither it is consistent with concentrating employment growth within the A38/M5

corridor and at locations in tandem with housing growth. Pegasus considers that there are significant deliverability issues at this location and consequently it will not assist in meeting this Priority Issue. This is addressed in further detail later in these representations.

- 1.18 Transport is not identified as a separate issue; however, it is acknowledged that this cuts across all issues. Nevertheless, in achieving sustainable development this is a fundamental issue to be addressed and also in respect moving the district towards becoming carbon neutral by 2030. The PPG on Climate Change refers to opportunities to integrate climate change mitigation and adaptation objectives into the Local Plan. Examples of mitigating climate change by reducing emissions: Reducing the need to travel and providing for sustainable transport, thus supporting locations that provide the potential for new and expanding public transport services well related to infrastructure corridors.
- 1.19 The Plan at this stage is not supported by an Infrastructure Delivery Plan (IDP) or any viability evidence. The Plan needs to identify what infrastructure is required and how it can be funded and brought forward. A collaborative approach is expected to be taken to identifying infrastructure deficits and requirements, and opportunities for addressing them. Paragraph: 059 Reference ID: 61-059-20190315.
- 1.20 There is a need to ensure that there is a robust evidence base with regards to the SATURN modelling work being undertaken as part of the transport assessment for the Local Plan review. This will be required to identify a suitable package of transport mitigation to support the proposed development.
- 1.21 The Council's top priority should be meeting the housing needs of the District as informed by the Gloucestershire Housing Needs Assessment, conducted using the standard method in accordance with the NPPF. There should be no mismatch between the Council's housing and economic growth priorities.
- 1.22 The Local Plan should aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs for neighbouring area where this is consistent with the NPPF.
- 1.23 A statement of common Ground will need to be prepared with neighbouring authorities in accordance with the NPPF and PPG. The PPG on Plan Making states:

“Statements need be prepared and then maintained on an on-going basis throughout the plan making process. As a minimum, a statement needs to be published when the area it covers and the governance arrangements for the cooperation process have been defined, and substantive matters to be addressed are determined. If all the information required is not available (such as details of agreements on strategic matters) authorities can use the statements to identify the outstanding matters which need to be addressed, the process for reaching agreements on these and (if possible) indicate when the statement is likely to be updated.”

1.24 The PPG states:

“Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated.” Paragraph: 020 Reference ID: 61-020-20190315

2. Making Places – the Development Strategy

Vision to 2040

- 2.1 It is noted that there are only some minor wording changes to the proposed Local Plan vision, it considers the issues that are likely to affect the location of development and the movement of people in order to achieve sustainable development e.g. becoming carbon neutral by 2030 and continuing to adapt to changing lifestyles, including travelling in sustainable ways. The amended Vision for the Plan to 2040 is supported.

Strategic Objectives

- 2.2 Having compared the strategic objectives with those in the previous consultation version of Local Plan – the emerging Strategy Paper of November 2018, there are a few changes to the proposed wording, which “updates” the objectives in keeping with the NPPF. It is noted that Strategic Objective SO5: climate change and environmental limits states that *“Promoting a development strategy that reduces our District’s carbon footprint, adapts to climate change and respects our environmental limits by: Securing zero carbon development through building design.”* However, it is not clear how this will be achieved, reference should be made to the PPG Design: process and tools and to the National Design Guide (October 2019)
- 2.3 The strategic objectives are supported, but importantly they need to be deliverable.

An introduction to the development strategy

- 2.4 The strategy (paragraph 2.13 page 26) proposes concentrating housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure. This approach is supported and is consistent with the NPPF and the achievement of sustainable development.
- 2.5 However, it is noted that the Draft Plan (paragraph 2.14) also proposes housing and employment growth to be centred on two new settlements at Sharpness and at Wisloe within the Berkeley Cluster and the Severn Vale Cluster respectively, (A38/M5 corridor) in order to create new sustainable communities along the garden village principles.
- 2.6 The SA prepared by LUC for the Draft Local Plan (November 2019) supports the focus on the Tier 1 settlements for strategic growth (para 4.61):

“Directing much of the strategic growth to the tier 1 settlements (Cam, Stonehouse and Stroud) is likely to ensure that most new residents will have a good level of access to existing healthcare facilities and areas of open space, as well as education facilities and cultural facilities. Opportunities to walk or cycle to access services and facilities and employment opportunities are also likely to be greater in those areas. In contrast, strategic growth at new settlements (Sharpness and Wisloe) could leave new residents without immediate access to a wide range of existing services and facilities during the early stages of development. The critical mass provided is likely to support the delivery of new services and facilities as well as the delivery of supporting infrastructure through S016/CIL contributions, which will satisfy the needs of residents once the sites are built out.” (my emphasis)

- 2.7 However, the SA alerts the Council to the fact that in the early years at the new settlements, new residents could be left without the access to the wide range of facilities and services and a lack of public transport; in which case these settlements will become reliant upon the private car. Whilst the SA indicates that the critical mass to support the delivery of new facilities and services will be obtained through S106/CIL contributions, this statement is made in the absence of the Infrastructure Delivery Plan (IDP) and any viability evidence to support the new settlements.
- 2.8 The SA (paragraph 4.64) also alerts the Council to the implications of the delivery of 2,400 dwellings at Sharpness as this location is in close proximity to the Severn Estuary SSSI/SPA/SAC/Ramsar site and therefore there is potential for adverse impacts on these internationally designated sites.
- 2.9 Pegasus object to the proposed Garden Village at Sharpness and Wisloe Green.
- 2.10 In our previous representations we have stated that in terms of Sharpness the area has a long history, a site was allocated for 300 dwellings in the adopted Local Plan, but has yet to come forward for development. Furthermore, it is not clear what the demand is for businesses to locate at Sharpness, as the Strategic Economic Plan focuses on the M5 around junctions 9, 10, 11 and 13. The Local Enterprise Partnership is in the process of reviewing and updating its Strategic Economic Plan (SEP) and producing an Industrial Strategy.
- 2.11 The Draft Gloucestershire Local Industrial Strategy September 2019 aims to *“build on recent success to drive inclusive growth and secure an economy fit for the future, which benefits everyone who lives and works in the county.”* It is

noted that dialogue with Government has commenced on the draft Local Industrial Strategy, developing it further, agreeing priorities and joint areas of activity, working towards a jointly agreed document by March 31st 2020.

- 2.12 The draft strategy identifies Gloucestershire's strengths, opportunities and challenges. It also aligns with the Government's National Industrial Strategy, which focuses on five 'Foundations' for productivity, and four 'Grand challenges'. The Industrial Strategy looks to focus "around the "Growth Zone" which runs through the county adjacent to the M5 and will deliver thousands of new homes and commercial land to generate economic growth for the county".

"These proposals have highlighted the potential for a Central Gloucestershire City Region – a vibrant central Gloucestershire area that builds on the two urban centres, working together to provide the transport infrastructure and housing needed by those people we want to attract and retain in the county." GFIRST LEP DRAFT LOCAL INDUSTRIAL STRATEGY Page 80 (2019)

- 2.13 The Draft Industrial Strategy refers to:

"Gloucestershire's future garden towns and villages will put green energy and green construction at the heart of their design.

These developments have been identified in:

- **Tewkesbury at the Tewkesbury Garden Town;**
- **Cheltenham at the Cheltenham Garden Village;**
and
- **Stroud district at the Sharpness Eco Village."**

- 2.14 Interestingly there is mention of the anticipated contribution from Tewkesbury Garden Town, in the M5 Growth Zone, "will provide opportunities for new developments and productive businesses. It promises to deliver £74m in GVA and 3,300 jobs with no taxpayer expense." However, there is no mention of the expected contribution from the Sharpness eco village.

- 2.15 Furthermore, it is not clear how Sharpness eco village will deliver when the focus in the Draft Industrial Strategy is on developing a vibrant business and education offer at Berkeley Science and Technology Park, as a hub for future low-carbon technology innovators which is intended to "work in tandem with a proposed future Eco-Park at junction 13 of the M5, creating a vibrant hub for green technology and skills in Stroud district". Page 38 GFIRST LEP DRAFT LOCAL INDUSTRIAL STRATEGY.

2.16 The LTP which is under review focuses on the improved choice of mass transit options with interchange hubs for a combination of transport modes, active travel, walking and cycling.

2.17 The draft LTP review (considered at the County Council Cabinet meeting in December 2019) outlines a vision for Growth in Central Gloucestershire. Paragraph 5.10 of the Draft states:

“Transport infrastructure will have a key role in enabling delivery of this vision for cyber as well as the significant wider business and housing growth. This does not only mean the provision of a functioning, high quality and reliable transport network to provide mobility within this new City Region, but also high quality and fast access to key destinations in the City Region and beyond. Mass transit systems will play their part; systems such as; light rail, high frequency bus routes and guided busways.”

2.18 The LTP refers to the continued functioning of the M5 as a reliable and fast link providing regional connectivity but this will be supported by a transport strategy that will also see a significant shift in demand from the M5 to the Birmingham to Bristol rail link that runs in parallel to the M5.

2.19 It is envisaged that strategic interchange hubs at all M5 motorway junctions, all railway stations and some other key locations will link the core public transport corridor and these high frequency, high quality bus services to long distance travel opportunities.

2.20 For the Seven Vale area the draft LTP recognises the Key growth areas identified in the emerging Stroud local Plan in the areas of Stonehouse, Cam, Hunts Grove, Cambridge, Newtown and Sharpness.

2.21 However, the draft LTP states that the rail network in this area offers great potential for growth, into the centre of Bristol from Cam and Dursley Station and from Stonehouse, or Stroud to London. Recent improvement to journey times and frequency to London have been made and the draft LTP refers to an ambition that service frequencies at Cam and Dursley Station would increase to three trains per hour in the future. Such a strategy supports further growth in and around Cam and Stonehouse being sustainable locations served by public transport.

2.22 However, it is noted that the LTP review at paragraph 3.55 acknowledges that Sharpness is isolated in its location etc.

“Sharpness is a strategic allocation site that has the potential to benefit greatly from an enhanced walking and cycling network within the allocation area. However, Sharpness is isolated in its location so would require a range of transport modes to serve external trips, in particular a direct express public transport link to Cam and Dursley railway station and along the A38 to Gloucester/Cheltenham and into the Bristol city region. The current bus journey time between Sharpness and Cam and Dursley station is approximately 50 minutes and fails to compete with the ease of the private motorcar currently.”

2.23 Consequently it is considered that in order to support a sustainable strategic allocation at Sharpness significantly more investment is required in terms of infrastructure compared with other locations directly related to the transport corridors e.g. such as land at Gove End Farm at Whitminster.

2.24 In order to meet wider development needs and to support and improve existing services and facilities at smaller towns and larger villages modest levels of growth are envisaged at the local service centres of Berkeley, Minchinhampton, Nailsworth and Painswick. Lesser levels of growth are proposed at some of the villages including Whitminster. This approach is supported.

2.25 However, it is considered that land at Grove End Farm, Whitminster, which is at the confluence of the A38/M5 and A419 corridors, well related to Stroud/Stonehouse, Cam/Dursley and also Gloucester, provides the opportunity to achieve a mixed use development in a highly sustainable location (being well connected to public transport). Figure 1 from the Sustainable Transport Strategy demonstrates the location of Whitminster at the hub of the identified movement corridors in the STS.

APPENDIX 1: MOVEMENT CORRIDORS FROM THE STROUD SUSTAINABLE TRANSPORT STRATEGY (NOVEMBER 2019)

2.26 This is promoted in further detail in response to the Whitminster Cluster.

Stroud District's Housing requirement up to 2040

- 2.27 The Government continues to prioritise the need to significantly boost the supply of homes in the country to meet housing needs and to address long term affordability issues.
- 2.28 In the Housing White Paper the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, the Government have announced the need to review the Standard Method and this review is expected in September 2020. It is understood that this review is proposed to ensure that the standard method better reflects the Government's objective to deliver 300,000 homes per annum rather than the 266,000 produced by the current standard method.
- 2.29 The emerging Stroud Local Plan will be assessed in the context of national policy at the time, and as this is unlikely to be submitted for examination prior to the review of the standard method, the emerging Local Plan should be prepared with sufficient flexibility to adapt to any changes which arise from the standard method.
- 2.30 Paragraph 2.27 (page 29) of the emerging Plan suggests that there may be a need to identify additional reserve sites, should sites in the Plan not come forward at the rates envisaged, it is also considered appropriate that additional sites are identified to ensure a robust and deliverable strategy, particularly in light of the review of the standard method.
- 2.31 The standard method identifies a minimum annual housing need figure, it does not produce a housing requirement. (PPG paragraph 002 reference ID 2a-002-20190220). Neither should this figure be referred to as a target.
- 2.32 The uncapped standard method from 2019 onwards is for 651.6dpa, or 13,683 over 21 years (2019-40). The capped standard method from 2019 onwards is for 638.4dpa, or 13,406 over 21 years (2019-40).
- 2.33 Gloucestershire LHN figure for Stroud district is capped at 40% above the latest housing need given that the plan was adopted within the last 5 years. However, if the plan is not submitted before November 2020 then the strategic housing policies for housing will not longer be considered up to date and the applicable

cap will change. Based on current figures above the uncapped figure would be 652 dwellings (rounded) per annum.

- 2.34 It is noted that the Council propose a figure of 456 dwellings as the housing requirement for the period 1st April 2019 – 31st March 2020. For the plan period 2020 – 2040 the Local Housing Need Assessment 2019 (Consultation Draft: October 2019 produced for the Gloucestershire authorities by ORS; the assessment confirms the standard method figure of 638 dwellings per annum. It is noted that this a 40% increase form the figure in the current adopted Local Plan of 456 dwellings per annum.
- 2.35 The PPG (2a-007) identifies that the cap reduces the number generated by the standard method, but it does not reduce housing need itself. Accordingly, the PPG (2a-007) identifies that where a Local Plan is adopted with such a cap this may require an early review to ensure that any housing need above the cap is planned for as soon as possible, and that consideration can still be given to whether a high level of housing need could be delivered now.
- 2.36 The emerging Local Plan (Table 2 – housing requirement to 2040) identifies a housing requirement for 13,216 homes in the period 2019-40 (=456+12,760) which does not even meet the capped minimum housing need for 13,406, let alone meet the actual minimum housing need for 13,683.
- 2.37 It will therefore be necessary to increase the housing requirement to at least 13,406 dwellings and consideration will need to be given to whether this should be increased to 13,683 dwellings if this is achievable or if not, this will need to be addressed through an early review.
- 2.38 It is considered that this is easily achievable in Stroud such that a minimum of 13,683 homes should be planned for and this will also prevent the requirement for an early review.
- 2.39 The PPG Housing Needs of different Groups (Paragraph: 001 Reference ID: 67-001-20190722) identifies that the needs of individual groups may exceed the standard method, because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method. The PPG states that LPAs will need to consider the extent to which the identified needs of specific groups can be addressed.

- 2.40 The LHN Assessment Figure 50 identifies a need for 8,476 affordable homes over the plan period (including to accommodate those in affordable need in the Private Rented Sector {PRS}).
- 2.41 However, the emerging Local Plan identifies a housing requirement for 13,216 homes in the period 2019-40 (=456+12,760) which means that in order to meet the affordable needs in full, it would require that 64% of homes delivered are delivered as affordable homes.
- 2.42 However, proposed Policy CP9 only seeks 30% affordable housing on sites of 10 or more dwellings. Therefore, even if all housing was delivered on sites of 10 or more dwellings, only 3,965 affordable homes would be delivered (=30% of 13,216).
- 2.43 There would remain a need for an additional 4,511 affordable homes (=8,476-3,965) which would not be provided for under the proposed housing requirement. In order to meet this in full, even assuming that all housing is delivered on sites of 10 or more homes would require 28,253 homes, rather than the 13,216 proposed in the Local Plan.
- 2.44 Whilst the affordable housing needs are not necessarily required to be met in full, the PPG Housing Needs of Different Groups, Paragraph: 008 Reference ID: 67-008-20190722 identifies that an increase in the total housing requirement should be considered where it could help deliver the required number of affordable homes.
- 2.45 It is therefore considered that in the case of Stroud, where the proposed housing requirement would deliver less than half of the affordable need, there is a strong case for increasing the housing requirement to deliver a greater number of affordable homes.
- 2.46 Paragraph 2.43 (page 32) states that the figure of 638 dwellings per annum will be sufficient to provide the future workers to support economic growth likely to take place within the District. It is noted that the Gloucestershire Local Housing Needs Assessment 2019 for Stroud district results in more workers based on the standard method than from the economic forecasts from Oxford Economics and Cambridge Econometrics (Figures 12, 13 and 14). The assessment concludes at paragraph 5.18:

“On the basis of the analysis, to ensure that there will be sufficient resident workers to align with the jobs growth identified by the forecast on the basis of no change in the commuting rates identified by the 2011 Census, there would be no justification for increasing the minimum LHN based on the standard methodology.”

2.47 The PGG Housing and economic needs assessment outlines when it might be appropriate to plan for a higher figure than the standard method indicates. The circumstances which are likely to apply to Stroud are where an authority agrees to take on unmet housing need from neighbouring authorities. It has already been identified that in the longer term additional sites will be required to meet Gloucester’s housing needs beyond 2028. An assessment has identified sites within Stroud district at the Gloucester fringe which are functionally related to Gloucester and offer the potential to meet Gloucester’s needs. Currently a site at Whaddon is safeguarded for this purpose. However, the Plan acknowledges that further work is required by the Councils to determine how Gloucester’s unmet needs will be accommodated.

2.48 In accordance with the NPPF paragraph 27,

“In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.”

Stroud District’s housing distribution up to 2040

2.49 Pegasus support the overall development strategy proposing housing allocations at the districts existing main settlements of Stroud, Stonehouse, Cam, but an objection is made to the proposed new garden villages at Sharpness and Wisloe Green both of which are located in the Berkeley Cluster.

Sharpness

2.50 The Draft Plan proposes a new garden village at Sharpness with up to 2,400 dwellings by 2040 and 10 hectares of employment, community uses and a new secondary school and another phase of development by 2050 totalling 5,000

dwellings. A new rail station enabling rail services to Cam and Gloucester and rapid bus services to the nearest main settlements is envisaged.

2.51 Pegasus object to the proposed development, for a number of reasons, including its location, as it is not within the key movement corridors identified in the Stroud Sustainable Transport Strategy (November 2019) prepared by AECOM, and it is not considered to be deliverable in the plan period.

2.52 The Sustainable Transport Strategy acknowledges that Sharpness has an issue of relative remoteness, particularly in public transport terms, there is a lack of a regular bus service to the area. The STS states that this "remoteness" could assist with internal self-containment, however this creates social and economic isolation.

2.53 The current local plan (2015) focusses on identifying those settlements that offer the best opportunities for sustainable development, this emphasis on sustainability is continued in the local plan review, however with the climate change agenda becoming a priority issue, there is even more of a focus on sustainable and deliverable development.

2.54 The NPPF states that plans should be prepared positively, in a way that is aspirational but deliverable.

2.55 The Stroud Sustainable Transport Strategy, (STS) referred to above states that the topography and settlement pattern of the district results in high levels of demand being funnelled along key movement corridors. Three main movement corridors are identified where integrated packages of initiatives can be delivered, which can "showcase multimodal use with a focus on sustainable travel modes."

2.56 Importantly it is noted that:

"These corridor packages enable movement by all modes, in all directions and, with interchanges, provide connections to other destinations." (my emphasis)

2.57 Such an approach accords with the NPPF paragraphs 102 and particularly 103 which states that:

"Significant development should be focussed on locations which are or can be made sustainable, thorough limiting the need to travel and offering a genuine choice of transport modes." (my emphasis)

2.58 The STS states that:

“It is important to focus limited resources where the greatest benefits can be achieved.”

- 2.59 Given the above it is imperative that locations for development are deliverable and offer a real choice of transport modes and that resources are focussed where they can achieve the greatest benefits. It is considered that development at Sharpness a location which is some significant distance from the key movement corridors and major centres of employment cannot provide a sustainable opportunity for development.
- 2.60 We are aware from previous representations submitted by Stagecoach that 2,000 dwellings at Sharpness would not be sufficient to justify a commercial operation to support even an hourly bus service to Stroud; which would require two vehicles in the operating cycle, even if the demand arising from the current population in the immediate area is factored in. Stagecoach have also stated that in reality travel demands from the site will be split across a number of relatively distant journey destinations, such that there would be insufficient critical mass of demand for passenger transport on any one corridor. The relative proximity to junction 14 (which is highly constrained and acknowledged in the STS to have capacity issues) would enable commuting by car to be the very likely option for residents given that there would not be a sufficiently frequent or direct public transport service. Consequently, the traffic impacts from the development will have significant impacts on the operation of the local and national highway networks, which will further compound delays from congestion and affect and undermine the reliability of bus services.
- 2.61 Furthermore 2,400 dwellings is less likely to achieve any significant levels of self-containment.
- 2.62 Evidence in support of the promotion of Sharpness has provided some initial estimates of trip generation at peak times and assigned the destination for these journeys. This is being estimated at around 4,700 person trips in the morning, and 4,200 in the evening. Over 2,000 people are estimated to travel to and from Sharpness from outside in the peak periods. This suggests a very high degree of internalisation. However, during the early stages of the commencement of the development neither employment or a wide range of facilities and services will be available on the development site, or within reasonable walking or cycling distance, unlike those other locations proposed for development in the Draft Plan and the omission site of Grove End Farm, Whitminster.

2.63 The promoters of Sharpness Garden Village refer to the likely re-opening the Sharpness railway line to passenger trains, with a new service to Cam and Gloucester. There is no evidence to support this. It seems to suggest a service to Gloucester which would necessitate the service on the branch line joining the main line and occupying train paths that would otherwise be available for improvements to the longer distance services and the frequency of local rail services between Bristol and Gloucester/Cheltenham and possible to Ashchurch as referred to below. It is not clear how the proposal by the promoters of Sharpness would affect the aims of increasing the frequency of services to Gloucester and Bristol which are referred to in the emerging LTP.

2.64 The GFirst LEP Draft Gloucestershire Local Industry Strategy also refers (on page 69) to Gloucestershire's Connecting Places Strategies (CPS), building on recent investment by government and the LEP in:

- **“Committing to the Bristol MetroWest Phase 2, which will double the frequency of rail services to Gloucester, to provide half-hourly services to Bristol.”**

2.65 The GFirst LEP Draft Gloucestershire Local Industry Strategy concludes with a Statement of what is needed for the County, this includes:

“To develop a rail strategy to ensure that rail travel provides a viable alternative to the private car for travel within the county, between its key towns, and to other parts of the country.

As part of this we will seek to:

- **increase the frequency and passenger capacity of services between Gloucestershire and London, Bristol and Birmingham;**
- **link with the planned MetroWest service to deliver direct services to and from Bristol; and**
- **ensure Tewkesbury Garden Town is adequately linked to the rail network.”**

2.66 Consequently, it is not clear from the promoters of the Sharpness Garden Village how their proposals would affect the wider objectives of the Gloucestershire Local Industrial Strategy and the Gloucestershire LTP.

2.67 The Gloucestershire Strategic Economic Plan (SEP) update 2018 continues to focus on the M5 around junctions 9, 10, 11 and 13. Page 21 of the SEP states:

“The Growth Zone seeks to identify and secure the availability of quality employment land in proximity to

the M5 motorway corridor that is attractive to businesses and has excellent connectivity throughout Gloucestershire and to the rest of the UK. The importance of the M5 in this context remains as significant now as it was in the original SEP."

2.68 Within this context it is not clear what the demand is for businesses to locate at Sharpness. To some extent proposing significant development which is not consistent with the current SEP is a high risk strategy and pre-judges further work, in particular the Industrial Strategy and other aspects of the evidence base such as the Landscape Sensitivity Assessment.

2.69 The Settlement Role and Function Study Update – May 2019 states at paragraph 3.34 that:

"It is crucial that the bulk of future housing growth is planned, in order to make the most of opportunities to sustain or boost communities' existing services and facilities and to enable people to access services and facilities elsewhere."

2.70 This statement is echoed in the STS (page 19) which states that:

"It is important that the people in future developments are not limited by their choice of sustainable travel modes and can connect to the key centres in the District with ease."

2.71 Paragraph 3.35 in this context states that:

"Careful planning should aim to:

- **Avoid sporadic development that offers little to sustain or boost existing communities.**
- **Focus growth towards those settlements that have better access to services, facilities and infrastructure.**
- **Support some growth in locations where there is the best chance to obtain coordinated improvements to community infrastructure, services and facilities as a direct result of development.**
- **Support some growth in locations where there is the best chance to bring about coordinated improvements to accessibility, connectivity and public transport as a direct result of development.**
- **Target and tailor future development in settlements where the vitality and viability of services and facilities may be under particular pressure from demographic or socio-economic trends.**

- **Establish appropriate limitation on the amount, scale and nature of any development at inaccessible lower tier settlements.**

- 2.72 It is noted that the housing trajectory in the Draft Local Plan anticipates 500 dwellings being delivered in the period 2025 to 2030 and in the subsequent five years a further 750 dwellings and in the final five years of the plan period, 1,150 dwellings. It is considered that this trajectory is unrealistic, it is widely acknowledged that although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times.
- 2.73 The NLP Study – “Start to Finish” concluded that 6.1 years is the average planning approval period of schemes of 2,000+ . The average for all large sites is circa 5 years. In which case for Sharpness assuming an application was submitted in 2020, planning approval would not be achieved before 2025. The NLP study concluded that “Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.”
- 2.74 Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. In the last 5 years of the plan period the trajectory envisages 230 dwellings per annum, this was only achieved in two schemes considered in the NLP Study – Cranbrook and the Eastern Expansion Area of Milton Keynes. In both cases there were specific circumstances that led to higher rates of delivery.
- 2.75 The trajectory assumes increasing delivery rates for Sharpness, this is contrast to research by NLP. Their research has concluded that delivery rates are not steady. NLP’s research showed that annual completions tended to be higher early in the build-out period before dipping. For sites with even longer build out periods, this pattern of peaks and troughs is potentially repeated again. Additionally the research found that the longer the site is being developed, the higher the probability of coinciding with an economic downturn.
- 2.76 The NLP research concluded for large sites that are likely to span more than a decade, that the timing and rate of phases will be determined by a range of factors including: the physical layout of the site, the ability to sell the homes; trigger points for payment for key social and transport infrastructure obligations; the economic cycle; and local market issues.

- 2.77 Due to the level of environmental designations and constraints in and around the proposed development area, which will require extensive mitigation, this will have a significant impact on viability and hence deliverability of the proposal. In turn this may also impact on the ability of this proposed development to deliver other policy requirements of the plan.
- 2.78 It is considered that the proposed new garden village at Sharpness will not achieve the above and deliver the number of dwellings anticipated in the plan period.
- 2.79 As set out in our previous representations to the emerging Strategy, Pegasus object to further development over and above the current local plan allocations at Sharpness. It is considered that irrespective of whether a new community at Sharpness is viable, its delivery is going to be inferior to sites better located to centres of population. Consequently reliance on this site places a high risk on delivery.

Wisloe Green

- 2.80 An objection is made to the proposed garden village at Wisloe Green, comprising 1,500 dwellings 5 ha employment land, retail, community uses and open space, this area lies between the M5 and the A38, to the south of Cambridge and east of Slimbridge, the A38 provides a barrier to further growth. This scale of development is at the minimum considered in the MHCLG Garden Communities Prospectus (August 2018) i.e. (1,500 – 10,000 homes). Whilst MHCLG indicate that consideration will be given to smaller proposals they need to be:

“particularly strong in other aspects. For instance, demonstrating exceptional quality or innovations, development on predominantly brownfield sites, being in an area of particularly high housing demand, or ability to expand substantially further in the future.”

- 2.81 Paragraph 6 of the MHCLG prospectus states that:

“All proposals must be of sufficient scale to be largely self-sustaining and genuinely mixed use as per paragraphs 13 b and c.”

- 2.82 There are principal physical constraints, e.g. the floodplain on the north eastern edge of the area adjacent to Cambridge and the proximity to the M5 to the east. This area has not been considered in the district’s Landscape Sensitivity Assessment (2016). A settlement of 1,500 dwellings cannot be considered as self-sustaining and its future expansion appears to be constrained by the

floodplain to the north, the A38 to the west, the M5 to the east and the railway line to the south.

- 2.83 Pegasus object to further development at Sharpness and the proposed garden village at Wisloe.

Whitminster

- 2.84 Pegasus consider that development should take place at Whitminster near junction 13 of the M5, this strategy is consistent with the SEP. As a sustainable and importantly deliverable alternative to the proposed garden village at Sharpness; Land at Grove End Farm Whitminster is proposed for a mixed use development comprising commercial/employment and residential uses. This is a sustainable alternative (or an addition to) to development proposed at Sharpness and Wisloe.
- 2.85 Land at Grove End Farm, Whitminster has been promoted to the Council through the Call for Sites. The location of the site is at the confluence of the A38/M5 and A419 corridors.
- 2.86 The STS identifies three main movement corridors where integrated packages of initiatives can be delivered, which can “showcase multimodal use with a focus on sustainable travel modes.” Whitminster is well placed to support this approach and provide the opportunities for sustainable travel. The location of Grove End Farm is entirely consistent with the Main Movement Corridors set out in the STS.
- 2.87 Development of the site will enable people to access services and facilities elsewhere along the movement corridors. The location is where there is the best chance to obtain coordinated improvements to community infrastructure, services and facilities as a direct result of the development and the best chance to bring about coordinated improvements to accessibility, connectivity and public transport as a direct result of development.
- 2.88 The site is in relatively close proximity to Tier 1 Main Settlements of Stroud, Stonehouse and Cam/Dursley, again consistent with the development strategy and providing a choice of sustainable travel modes and that can connect to the key centres in the District with ease.
- 2.89 The site is capable of benefiting and enabling improvements to existing public transport facilities including the provision of land for a park and ride facility. The

site is also well placed to benefit from new bus services to be delivered by development at West of Stonehouse which will provide at least a 30 minute frequency to Stonehouse, Stroud and Gloucester and 60 minute frequency to Cam and Dursley.

2.90 The site has capacity for approximately 2,250 dwellings, 18.3 hectares for a Business Park/Employment opportunities, local centre, primary school(s) and sports pitches and all the facilities and services necessary for a successful new community.

2.91 The site is not constrained. The SALA concluded for WH1007 that there were no known physical constraints preventing development. The site is gently sloping; there are no known ground contamination or land stability issues. Access to the site is from the A38, A419 and Grove Lane. There is reasonable access to services and facilities in the local area.

2.92 The SALA states:

“This extensive site borders the Industrial Heritage Conservation Area (IHCA), separated from it by the A419. There is archaeological potential, relating to the Stroudwater Navigation (canal), historic agriculture and ancient settlement. The wooded grove at the centre of the site is an historic feature of the landscape; whilst the footpaths that traverse it are part of a wider historic network of tracks and greenways, some of which are ancient.

An initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to a designated natural environment site. Note that the assessment does not consider whether there are protected species on this site and it is therefore recommended that any developer consult the Gloucestershire Centre for Environmental Records (GCER) for the potential presence of protected species on site.

The site is part of a larger land parcel identified in the Landscape Sensitivity Assessment as High/ medium sensitivity to Housing use and medium sensitivity to Employment use. The sensitivity of the area lies in its location on the top and slopes of a low ridge and its visibility to the north-east and south-west, its separation from the settlement by the A38 and its contribution to the rural setting of the settlement to the south-east including the public right of way, hedgerows and some trees.”

- 2.93 The SALA concluded that the site was not considered suitable for housing because of landscape sensitivity being visible on the top and slopes of a low ridge as part of the wider rural area and separated from the main settlement by the A38. However, the site is not within the Cotswold AONB and is not subject to any landscape designation and would present no harm.
- 2.94 It is considered that given the sites highly accessible location on a transport corridor and its proximity to Stroud and Stonehouse, that the site presents an opportunity to achieve a sustainable mixed use development provided this is carried out having regard to any landscape, heritage and ecological considerations.
- 2.95 A Position Statement has been prepared which includes a draft indicative masterplan.

APPENDIX 2: POSITION STATEMENT -LAND AT GROVE END FARM, WHITMINSTER

- 2.96 The indicative masterplan shows a mixed housing and employment development together with social and community infrastructure (to include: local centre, sports/recreation facilities and a primary school). The ridge and eastern parkland area and existing woodland informing the disposition of green infrastructure which also serves to minimise landscape impacts and buffer the employment land.
- 2.97 Whilst the site is shown as being phased it could be readily brought forward as a single site. In terms of delivery it is anticipated that the site could deliver around 150 dwellings per annum. If the Local Plan were to be adopted in winter 2021/22, the first dwellings completed on the site would be in December 2024 with a 15 year build programme the site will be completed within the plan period.
- 2.98 The site is within the control of a highly experienced employment and residential developer/promoter with a proven track record of delivering strategic sites in Stroud and indeed across Gloucestershire. In recent years land West of Stonehouse has been brought forward through the adopted Stroud Local Plan.

Local Economy and Jobs

- 2.99 The Gloucestershire Local Housing Needs Assessment (October 2019) has considered whether an uplift to the local housing need could be justified having considered the number of new homes and taking into account changes in the

local economic and population trends. Paragraph 2.52 (page 36) states that the latest job forecasts for the district suggest the need to plan for between 2,300 and 6,300 net new jobs in the period (2020 – 2040). However, it is not clear how many jobs the Local Plan will aim to provide for. Table 4 states that the employment land requirement is for 48.7 hectares over the plan period 2019 – 2040 i.e. 2.32 hectares per annum. This is a continuation of the previous figure identified in the Employment Assessment Review of 2014 which states that the average amount of employment land since 1991-2014 was 2.32 hectares per annum.

2.100 The estimate of jobs seems conservative when the SEP (page 21) states that at Junction 13 the new football stadium will provide in excess of 5,100 jobs excluding construction.

2.101 Further work needs to be undertaken to identify the future land requirements as the current figures are based on past take up rates. In addition the Plan states that not all permissions are likely to be implemented and there has been a steady and significant loss of employment land to other uses, all of which needs to be reflected in calculations for future land requirements over the plan period. Consideration also needs to be given to the locational needs of particular sectors of the economy, reflecting the Gloucestershire SEP, Local Industrial strategy and the accessibility to different modes of transport. With an increasing emphasis on carbon neutral, sustainable opportunities for travel to work etc, are going to be critically important. There is also the need to increase and diversity the employment base, in order to provide employment opportunities appropriate to the workforce and help reduce the number of people travelling to towns and cities beyond the district for work. The Local Enterprise Partnership has a focus on the A38/M5/rail corridor as a location for growth reflecting the good connections to the Midlands and the South West.

2.102 It is acknowledged that co-locating employment with housing provides the best opportunity for greater self-containment and shorter journeys to work by means of transport other than the car. Consequently, locations such as Stonehouse, Cam and Whitminster provide sustainable opportunities to co-locate residential and employment development and to take advantage of the close proximity to the Main Movement Corridors identified in the Sustainable Transport Strategy and support proposed Policy DCP1 Delivering Carbon Neutral by 2050.

2.103 This is in sharp contrast to the proposed Garden Village at Sharpness which proposes a “dedicated coach service to link Sharpness to Bristol City Centre” providing a “quick and reliable option for commuters”. The Plan states at paragraph 2.56 that:

There is considerable out commuting to work, which presents a big challenge if we are to reduce our District’s carbon footprint: as a rural district, many people are car-dependent, so we also need to ensure that access to jobs, services and facilities can be improved in the future and our chosen strategy must enable more sustainable forms of transport to be used. In order to stem out commuting Stroud will need to attract more knowledge based industries, enabling greater employment opportunities for the highly skilled and well qualified working population. This suggests a need for the District to both increase and diversify its employment base, in order to provide local job opportunities appropriate to the workforce and to help reduce the number of people travelling to towns and cites beyond the District for work. (my emphasis)

2.104 The Garden Village at Sharpness will only increase commuting to towns and cities out of the district and clearly does not accord with the Plans strategy “to reduce the potential for further out commuting”.

Core Policies

2.105 The Plan sets out six Core Policies in Section 2:

- Core Policy DCP1 Delivering Carbon Neutral by 2030
- Core Policy CP2 Strategic Growth and development locations
- Core Policy CP3 Settlement Hierarchy
- Core Policy CP4 Place Making
- Core Policy CP5 Environmental development principles for strategic sites
- Core Policy CP6 Infrastructure and developer contributions

2.106 Further Core Policies are then set out in Section 4 Homes and Communities, Section 5 Economy and Infrastructure, Section 6 Our Environment and surroundings.

2.107 The Plan needs to clear what the Strategic Policies are in one section of the Plan. The Core Policies should be considered as **Strategic Policies** which set out the overall strategy for the pattern, scale and quality of development in accordance with paragraph 20 of the NPPF (2019). Strategic policies need to address the

strategic priorities of the area and any relevant cross boundary issues to provide a clear starting point for non-strategic polices.

2.108 It is noted that at this stage there is no supporting text.

Core Policy DCP1 Delivering Carbon Neutral by 2030

2.109 It is not clear how Stroud District will become carbon neutral by 2030. However, strategic policies should in accordance with the NPPF look ahead over a minimum of 15 years from adoption and anticipate and respond to long term requirements.

2.110 Pegasus support the policy in so far as the target is for all new development “to be located where the form and mix of development itself or proximity to essential services and facilities minimises the need to travel”... “ to deliver the highest possible share of trips by the most sustainable travel modes”. Locations such as PS19a Northwest Stonehouse, PS 24 West of Draycott, Cam and omission site Grove End Farm, Whitminster support this policy.

Core Policy CP2 Strategic Growth and development locations

2.111 Pegasus consider that the overall quantum of development could be higher to address the significant affordable housing need, as set out earlier in our response to the Stroud District’s Housing requirement up to 2040.

2.112 Pegasus object to the proposed Garden Village at Sharpness for the reasons set out above, i.e. deliverability, sustainability in terms of its location away from the main movement corridors and the lack of opportunity to provide sustainable and viable alternatives to the private car.

2.113 Pegasus consider that land at Whitminster, at the confluence of the main transport corridors has far better opportunities to deliver a truly sustainable alternative to Sharpness.

2.114 It is noted that Policy CP2 includes provision for 2,500 dwellings at Whaddon to make a contribution to meeting some of the unmet housing needs of Gloucester City, subject to this being the case this is accepted. However, if is not required, this location should not be included to meet Stroud’s needs.

2.115 The approach proposed in the Draft Plan is one where housing and employment and community uses will be accommodated within existing settlement development limits. It is noted that the development limits will be updated to

reflect physical changes since they were last reviewed and to better reflect their intended function. Some limited development beyond settlement limits is acceptable subject to satisfying detailed environmental and design criteria. This is similar to the current approach in Policy CP2.

2.116 It is considered that settlement development limits should be reviewed to provide enough opportunities to meet identified housing needs in full.

2.117 The Local Plan Review should avoid an overly prescriptive inflexible approach to development proposals on the edge of towns and villages given the likely necessity to meet a higher housing requirement in the future.

2.118 This was an issue discussed at the last Local Plan Examination. The NPPF and PPG are clear that all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. Rural housing is essential to ensure viable use of local facilities such as retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship.

2.119 Settlement boundaries have commonly been used as a planning tool to limit development, but the opportunity exists to manage and deliver change by community agreement through the Local Plan and the Neighbourhood Plan process.

Core Policy CP3 – Settlement Hierarchy

2.120 The settlement hierarchy is in principle supported with the exception of Sharpness.

2.121 Pegasus supports the identification of Stonehouse and Cam and Dursley as Tier 1 settlements in the emerging Draft Local Plan.

2.122 However, it is considered that Whitminster has the potential to be higher in the settlement hierarchy than a Tier 3a settlement. Whitminster is well located and accessible and benefits from proximity to higher order settlements. The settlement provides a range of facilities and services, including a primary school, pubs, restaurants, convenience stores, village hall and is served by a regular bus service.

2.123 Whitminster is one of the District's larger villages and it is acknowledged in the Settlement Role and Function Study (2018) that *"there is clear scope to improve accessibility by increasing the frequency and extent of public transport services."* It also states that *"...its relative proximity to the larger service-centre settlement of Stonehouse and its location on the A38, a key transport corridor, offers potential to develop better transport links to strategic facilities (including improved walking or cycling connectivity)."*

2.124 Whitminster is relatively unconstrained by environmental, topographic or physical obstacles.

2.125 Given its location and proximity to the M5 it is accessible and attractive to the market. Given the availability of land suitable for development and its facilities and services it has the potential to be a Tier 2 settlement in the emerging local plan.

2.126 It is not clear what the justification is for Painswick moving from a Tier 3 settlement to Tier 2 given that the Sustainability Appraisal states at paragraph 6.87 that it has been identified as having:

"high sensitivity to employment or residential development."

2.127 Paragraph 1.6 of the Sustainability Appraisal states:

"Much of the land in the eastern portion of the District beyond the more sizeable settlements falls within the Cotswolds Area of Outstanding Natural Beauty (AONB) which has been designated in recognition of its rich, diverse and high quality landscape. Significant areas of land at the Severn Estuary have been designated as a Special Protection Area (SPA), a Special Area of Conservation (SAC) and a Ramsar site and these areas fall partly within the boundaries of the District to the south west. Additional important biodiversity sites in the District include Cotswold Commons and Beechwoods National Nature Reserve (NNR) and Cotswold Beechwoods SAC both of which are in close proximity to Painswick and Rodborough Common SAC immediately to the south of Stroud."

2.128 An objection is therefore made to the proposal to move Painswick from a Tier 3 to a Tier 2 settlement.

Policy CP4 Place Making

2.129 It is noted that there are no proposed changes to this policy on Place Making, aside from punctuation.

Policy CP5 Environmental development principles for strategic sites

2.130 The proposed strategic sites are identified in Core Policy CP2, development of the strategic sites is expected to fulfil the requirements for Core Policy CP5. It is noted that there are no proposed changes to this policy.

Policy CP6 Infrastructure and developer contributions

2.131 There are no proposed changes to this policy, it should reflect the changes to the PPG on Community Infrastructure Levy (September 2019).

3. Making Places – Shaping the future of Stroud District

The Stonehouse Cluster

3.1 Pegasus supports the identification of Stonehouse as a Tier 1 settlement in the emerging SLPR. It is a sustainable and suitable Tier 1 settlement location at which housing needs can be met. The 'very important employment role' of Stonehouse to the Stroud economy is acknowledged with its sustainable transport linkages to Stroud, Swindon, Gloucester and beyond via the railway network. As a settlement with excellent access to both sustainable transport infrastructure and the strategic road network, situated at junction 13 of the M5, the Tier 1 settlement is well placed to enable the District to meet its economic growth objectives.

Land Northwest of Stonehouse

3.2 The majority of land within PS19a Northwest of Stonehouse has been promoted by Pegasus on behalf of Robert Hitchins Limited. Whilst the principle of development in this location is supported, an objection is made to the capacity of 650 dwellings for PS19a which is for a larger site than promoted by Robert Hitchins Limited. Land at west of Stagholt Farm was promoted for 800 dwellings and mixed use development and comprises a smaller site than identified in the emerging strategy at PS19a.

3.3 It is considered that extending the adopted Local Plan site SA2: Land West of Stonehouse into site PS19a makes the best use of the services and facilities and infrastructure to be delivered at the existing allocation in terms of delivering an increased number of dwellings and employment land for the Tier 1 settlement for the plan period up to 2040. The proposed area for development PS19a is in close proximity to large areas of employment and close to the strategic highway infrastructure of the M5 motorway interchange at Junction 13.

3.4 Site PS19a lies within immediate walking and cycling distance of both existing and planned employment and is well placed to benefit from the bus services coming forward at West of Stonehouse which will ensure at least a 30-minute frequency to Stonehouse, Stroud and Gloucester and 60-minute frequency to Cam and Dursley. Further development here could be expected to help sustain a more attractive operating frequency. The site is well positioned to benefit from capacity improvements from the A419 Corridor Improvements Plan.

- 3.5 It is noted that the SALA states that an initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to a designated heritage asset and that an initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to a designated natural environment site.
- 3.6 The report by White Consultants – Evaluation of Site Landscape and Visual Issues report for Stroud District Council (October 2019) identified this as a potential
- 3.7 candidate site, it recognises the area forms an extension of Stonehouse northwards. However, the report concludes that this *“could be softened and integrated by appropriate planting as well as a sensitive approach to development pattern. The SAC mitigation measures should also be defined and implemented.”*
- 3.8 Land North of the West of Stonehouse (i.e. Land at west of Stagholt Farm) was included in the SALA May 2017, it is part of the site ref STO016 in the Parish of Standish included in Appendix 3 as sites with future potential. It is a greenfield site and comprises 25.063 hectares.
- 3.9 Access to the site would be via the West of Stonehouse allocation in the adopted Local Plan (Policy SA2 and planning ref. s.14/0810/OUT). There are no constraints. The site rises gradually from east to west and is largely flat towards the north. The site is bisected by an unsurfaced track, which provides vehicular access to Stagholt Farm and fields.
- 3.10 A Landscape and Visual Appraisal has been prepared for the site by MHP Design Ltd Chartered Landscape Architects and concludes that:

“The development of parcel PS19a would appear as a seamless part of the well treed settlement of the allocated SA2 land with a new interface with the open countryside formed by the new buffer of green infrastructure located along the northern boundary of the land parcel. This approach protects the settled rural landscape character already experienced from the AONB and replicates the successful mitigation woven into the masterplan for the allocated land south of the land parcel.”

APPENDIX 3: LANDSCAPE AND VISUAL APPRAISAL PS19A NORTHWEST STONEHOUSE

- 3.11 The latest concept plan (July 2019) prepared by Pegasus on behalf of Robert Hitchins Ltd, includes a land budget; and shows inter alia; disposition of development proposed, primary access points, secondary links and footpaths.

Two options have been submitted to the Council (with and without a primary school) around 666 and 700 dwellings respectively. The option including a primary school shows connectivity with and relationship with the consented development adjoining to the south.

APPENDIX 4A: WIDER CONTEXT PLAN FOR PS19A NORTHWEST STONEHOUSE

APPENDIX 4B: DEVELOPMENT FRAMEWORK PLAN NORTHWEST STONEHOUSE INCLUDING SCHOOL SITE

3.12 The dwelling mix needs to be established but it is anticipated that it will be similar to that being delivered on land to the south (i.e. the allocation in the adopted Local Plan).

3.13 Pegasus supports the proposed allocation PS19a Northwest Stonehouse for a mixed-use strategic allocation in the emerging draft Stroud Local Plan, but the quantum of development should be increased to between 666 and 700 dwellings respectively, depending on whether provision is made for a 1FE primary school dwellings. Pegasus support the inclusion of the site in the Draft Local Plan review being well related to a Tier 1 settlement at Stonehouse with access to facilities and services and is therefore consistent with the settlement strategy. The site is available, suitable and achievable and could start to deliver housing in 2023.

3.14 Potential delivery rates (assuming a start date post 2022 as requested):

Year ending 31st March	Completions
2023	50
2024	50
2025	75
2026	75
2027	75
2028	75
2029	75
2030	75
2031	75
2032	75 (or 44 with school option)
Total	700

3.15 The above assumes two outlets and takes into account the overlapping completions with the currently consented site to the south.

STO 006 – Land South of Bristol Road

3.16 Pegasus consider that STO 006 Land South of Bristol Road should be considered for development purposes in the emerging SLPR. The site is situated adjacent to the main A419, it was considered in the SALA 2017 as site (STO 006) 'Land South

of Bristol Road', a site plan is included in Appendix 5, together with a Heritage Assessment.

APPENDIX 5: LAND SOUTH OF BRISTOL ROAD, STONEHOUSE (INCLUDING INDICATIVE PLANS AND A HERITAGE ASSESSMENT)

3.17 The SALA concluded that:

"Development of housing or employment should be small scale and there would need to be green gaps retained to allow views towards the canal corridor and to emphasise the physical separation between the historic mills. In terms of housing, this site could be part developed for medium density development typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of about 30 dph, and the suggested yield is 70 units."

3.18 The Assessment acknowledges that there are no known physical constraints preventing development of this land and that it is accessible with good access to local facilities and services.

3.19 The site is located on land immediately adjacent to the built-up area of Stonehouse. The town forms part of the Stroud Urban Area along with the settlements of Stroud, Thrupp and Brimscombe, North and South Woodchester and Nailsworth and lies approximately 4km to the west of Stroud Town centre. The site is itself located on the south western edge of Stonehouse approximately 0.8km from the town centre. It lies to the south of the A419 Bristol Road which acts as key arterial route linking Stroud to the M5 motorway. The site is a flat arable field on the southern side of the A419, Bristol Road.

3.20 From the adopted Local Plan Proposals Map it can be seen that the site is located immediately adjacent to, but outside of the defined settlement boundary. The site is however enclosed by existing development on three sides with residential and large scale industrial development to the north, modern Industrial and business units to the west and a commercial training centre and established areas of residential development beyond a railway embankment to the east. To the south beyond a line of trees is the Stroudwater Canal, which separates the site from the open countryside beyond.

3.21 The site is situated immediately opposite the residential area of Avenue Terrace and the industrial area of Stonehouse Commercial Centre both on the northern side of the main road. The site consists of a roughly rectangular parcel of land contained by the Stroudwater Canal to the south with Bonds Mill to the west and

the elevated railway to the east. The site comprises 4.5ha of which 2.12ha is considered developable.

- 3.22 The Landscape Sensitivity Assessment (December 2016) has identified this site ST13 as

“Medium sensitivity to housing uses and Medium sensitivity to employment uses. Housing or employment south of the road would remove the openness of the area, and therefore the green gap, and would therefore reinforce the ribbon development character of the A419. It would also, potentially, adversely affect the setting of the canal. If housing or employment is considered, it should strictly follow the Conservation Area policies and guidelines and strong green gaps should be retained which allow views towards the canal corridor. It would however be very important that it addresses both the Bristol Road and canal edges in an appropriate way as well as providing gaps in the frontage.”

- 3.23 The Heritage Impact Appraisal (May 2017) identifies that there are “significant constraints” although the site itself has no structures of historic interest, it lies within the IHCA and contributes to the setting of the conservation areas character.
- 3.24 In support of the site a Heritage Assessment was prepared by Pegasus in August 2019 and submitted to the Council.
- 3.25 The Assessment concluded at paragraph 7.1 of the report that:

“The site is considered to make only a minor contribution to the character and appearance of the IHCA; derived from the site’s historic and aesthetic values, being historic agricultural land that is open space next to the Stroudwater Canal. However, its contribution has been diminished by the realignment and expansion of Bristol Road, and modern industrial and commercial development to the north and west, which have undermined the aesthetic and historic values of the site and, by extension, the IHCA. New built form within the site would not obstruct any key views within, towards or out from the IHCA. Overall, development of the site would be considered to cause minor less than substantial harm to the IHCA, at the low end of this spectrum of harm.”

- 3.26 Appendix 5 has been prepared which provides indicative plans for residential or employment generating uses. It also includes a housing delivery programme.

- 3.27 In the Issues and Options consultation, the site was included in the area 'STO A South of Bristol Road' and identified as a broad location for development around the settlement of Stonehouse. Pegasus consider that the site should be included in the Local Plan review being well related to a Tier 1 settlement at Stonehouse with access to facilities and services and is therefore consistent with the settlement strategy. The site is available, suitable and achievable and could start to deliver housing on adoption of the plan in 2021 delivering a range and mix of open and affordable housing products in the early part of the plan period.
- 3.28 The LUC Sustainability Appraisal (SA) (2019) accompanying the consultation considers residential site options at Section 5.0 'Sustainability Appraisal Findings for the Sites'.
- 3.29 Appendix 5 of the SA provides a summary of SA findings for all site options considered at each stage of plan preparation and is presented in Table A5.1 to Table A5.6 in Appendix 5
- 3.30 Table A5.3 of the SA 'Summary of scores for mixed use site options' indicates that site STO006 was considered by the SA for mixed use purposes (despite being in Appendix 3 of the 2017 SHLAA as having potential for up to 70 dwellings). The site has been promoted through the Local Plan for residential purposes, not mixed-use purposes and has previously been the subject of an outline planning application for up to 90 dwellings including infrastructure, ancillary facilities, open space and landscaping and construction of new vehicular access from the A419 Bristol Road (S.13/1348/OUT). The application was refused on 19th December 2014 and a subsequent appeal was withdrawn in October 2015.
- 3.31 It is noted that in Appendix 1 of the SA (November 2019) that:
- "The site appraised through the SA report was considered for 90 dwellings as part of a mixed use development, as advised by the Council and reflective of the recent planning history of the site."**
- 3.32 Appendix 8 of the SA page 713 states with regard to site STO006:
- "Emerging Strategy Paper Stage: The SALA identified that the site may have future potential for some development subject to resolving specific constraints and impacts. However, having considered the scale of growth appropriate for this settlement set out in the emerging strategy and the benefits and dis-benefits of this site in comparison with alternative sites at this**

settlement, it is not proposed at this stage to allocate this site for development. Draft Local Plan Stage: Having considered the scale of growth appropriate for this settlement set out in the Draft Plan and the benefits and disbenefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development."

- 3.33 Pegasus object to the findings of the SA as the site was not promoted to the Council as a mixed-use allocation; it should have also been considered with other sites submitted to the Council for residential purposes at Stonehouse.
- 3.34 It is considered that a further medium sized residential site at Stonehouse will help ensure the delivery of new dwellings to meet housing need at the Tier 1 settlement in the first five years of the plan, complimenting the larger sites of PS19a and PS19b which will ensure a continued supply of housing for the remainder of the plan period.
- 3.35 Land to the south of Bristol Road, has the capacity to accommodate up to 90 dwellings or a mix of employment generating uses (up to around 10,000 sq m in a sustainable and highly accessible location. It is in the control of an experienced developer and can be brought forward quickly delivering jobs, new homes or a combination of both.

Land south east of Nupend

- 3.36 A site south east of Nupend has also been submitted to the Council. The site is an area of mainly brownfield land which could come forward for development as a modest extension to Nupend without compromising the separation from the strategic west of Stonehouse development. The site would benefit from the proximity to the urban extension. Appendix 6 shows the location of the site and provides more detail.

APPENDIX 6: LAND SOUTH EAST OF NUPEND

Cam and Dursley

- 3.37 The focus on jobs and services in the southern part of the district at the First-Tier settlement of Cam and Dursley is supported. The provision of new homes will help to support economic growth and will reduce in-commuting as a range and choice of new homes are provided for the 'area's skilled and trained workforce'.
- 3.38 It is noted that:

“Cam and Dursley are adjacent settlements and their combined population (14,800+) makes this a really significant conurbation and an important second focus for the district.”

“Cam and Dursley have the best access to key services and facilities of anywhere in the District.”

- 3.39 The Settlement Strategy notes that Cam is relatively unconstrained by environmental, topographic or physical obstacles. Strategic growth offers some opportunities to bring about coordinated improvements to accessibility, connectivity and public transport as a direct result of development.

PS21 – Land adjacent to Tiltdown House

- 3.40 The emerging Draft Local Plan identifies site PS21 Land adjacent to Tiltdown House as a potential site for development for up to 15 dwellings. The site was included in the May 2017 SALA (ref: CAM008) and a site plan is attached at Appendix 7. Pegasus support the emerging allocation, although as a result of evidence base studies it is considered that up to 25 dwellings can be accommodated on the site.

APPENDIX 7: LAND ADJACENT TO TILSDOWN HOUSE - MASTERPLAN

- 3.41 This is a greenfield site comprising 0.968 hectares and is within the Settlement Development limit of Cam. It is outside the conservation area and there are no identified constraints. As the site is located within the identified settlement limits the site has not been assessed as part of the Landscape Sensitivity Assessment.
- 3.42 Land at Tiltdown House, Cam is according to the SALA suitable, available and deliverable for residential development. Moreover, it lies within the development boundary of Cam as defined in the adopted Local Plan and can come forward to deliver housing numbers in the short term. The site is surrounded by housing, except to the south east which adjoins open grassland north of Tiltdown House. It is acknowledged that Tiltdown House, is a historic building. Part of this site could be developed to provide for 15 dwellings.
- 3.43 Further evidence studies have been undertaken to support a planning application and conclude that the site is suitable, available and deliverable for housing, and has the capacity for up to 25 dwellings (including affordable housing) to help support the authorities five-year housing land supply. The site is suitable, available and deliverable and can deliver in totality within the next five years.

3.44 It is noted that the SALA assessment concludes that the site could be developed for medium/high density development typically comprising a mix of semi-detached and terraced dwellings at an average density of 40dph.

3.45 The site performs well in the LUC (2019) Sustainability Appraisal accompanying the consultation with less impact on biodiversity, air quality, landscape and townscape than other sites at Cam. The site does score negatively with regard to the historic environment, however this matter can be addressed with a sensitive and appropriate layout and design and materials that enhance and respect the setting and character of the historic Tiltdown house.

Land west of Draycott

3.46 Pegasus support the proposed allocation PS24 West of Draycott. The site is promoted by Robert Hitchins Ltd and Persimmon Homes and a joint submission was made at the last consultation on the Local Plan in January 2019. Cam is identified in the Local Plan as a Tier 1 settlement and is the second largest in terms of population. Together with Dursley it has the best access to key services and facilities of anywhere in the District.

3.47 Land west of Draycott is a greenfield site and comprises approximately 35 hectares and will provide a suitable and deliverable extension to Cam. The site is located adjacent to Draycott, approximately 4km northwest of Dursley and immediately southwest of Cam & Dursley railway station. The site is bordered to the north by the railway line, to the east by the A4135, to the south and southwest by Everside Lane and to the west by the M5.

3.48 The Sustainable Transport Strategy concludes:

- "There are opportunities to integrate the development into the existing settlement and provide access to local facilities including education, leisure, health, retail and employment on foot, by bicycle or by bus.

- The site is well placed to benefit from enhancements to bus services along the A4135 corridor and enhanced rail services at Cam & Dursley railway station.

- Proximity to Cam and Dursley railway station.

- Inclusion of a primary school within the development proposals would contribute to increasing the proportion of internalised trips.

- The site is adjacent to Draycott Business Park and Draycott Mills, a large employment area on the east side of the A4135.

- There is an existing network of public footpaths that intersect the site.

- National Cycle Route 43 routes along Moorend Lane and St John's Road to the north of the A38 through the village of Slimbridge approximately 1.5km north of the site."

3.49 The site is proposed for 700 dwellings, primary school, strategic landscaping and green infrastructure and associated community and open space uses. However, it is considered that the site can accommodate a minimum of 850 dwellings, the detail will be refined through the masterplan process.

3.50 The site is suitable, available and a deliverable site for development due to its location, access to services and facilities, limited physical constraints that can be brought forward for development without harm to biodiversity of heritage assets.

APPENDIX 8: LAND WEST OF DRAYCOTT, CAM – PRELIMINARY ILLUSTRATIVE MASTERPLAN

3.51 The illustrative masterplan shows a proposed car park to access and benefit Jubilee Fields and proposed parkland located at the highest point of development and adjacent to Jubilee Fields. The plan also shows the location of the site for a primary school.

The Severn Vale - Whitminster

3.52 The proposed vision for the Severn Vale Cluster states:

"Whilst maintaining and improving public transport, accessibility and services will remain key aims for these communities, this part of the District will experience no 'strategic' growth or development during the plan period.....

.... villages and hamlets may see small scale development in response to identified local needs, boosting their ability to remain sustainable and thriving communities. Frampton on Severn and Whitminster will continue to be a focus for local service provision.."

3.53 As a Tier 3a settlement located adjacent to the M5 and on the A38 with sustainable transport links to Gloucester, Stonehouse and Stroud, Whitminster is well placed to take development that meets more than local needs. The Parish does not have an adopted Neighbourhood Development Plan nor is it in the process of preparing a Neighbourhood Development Plan.

3.54 The Housing White Paper (Feb 2017) 'Fixing our Broken Housing Market' highlighted the role that new development can play in helping rural villages to

thrive as well as providing homes for local people. This is reflected in paragraphs 77 and 78 of the NPPF (2019) with paragraph 78 stating that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

- 3.55 No strategic plan led growth is proposed for the Severn Vale cluster of villages, other than ‘small scale development to meet local needs’. There are no significant constraints to development at Whitminster.
- 3.56 Given the extensive heritage and flooding constraints experienced by Frampton on Severn it is considered that the better location for strategic growth for the Severn Vale Cluster is at Whitminster, which also benefits from a local centre (unlike Frampton) and is located on the A38 in close proximity to the strategic road network of the M5. The village also has existing sustainable transport links to the nearby employment centres of Quedgeley, Gloucester, Stonehouse and Stroud and is at the confluence of the Main Movement Corridors.
- 3.57 Reference is required to sustainable strategic growth at Whitminster, such growth will also facilitate the delivery of new affordable housing which is mentioned as a key issue and top priority for the cluster.
- 3.58 The provision of new affordable housing and accommodation to facilitate downsizing is noted in the locally identified key issues and top priorities for the area. Such accommodation could be facilitated through the identification of a strategic housing site or sites at Whitminster in the emerging Local Plan.

PS46 Land West of School Lane

- 3.59 Pegasus supports the proposed allocation PS46 Land West of School Lane. The land lies north of the Whitminster Playing Field and is proposed in the Draft Plan for development comprising 30 dwellings and associated community and open space uses. The site, West of School Lane is included in the SALA (May 2017) (ref WHI005).
- 3.60 Whilst the site lies outside the existing settlement boundary for Whitminster it adjoins existing built form and the existing settlement boundary to the south east

and a number of residential properties and agricultural buildings to the north west. Development of the site will therefore involve the infilling of a gap between the existing settlement boundary and an area of built form to the northwest. The site is therefore well related to the existing built form of Whitminster.

- 3.61 The site is also well related to existing local facilities in the village of Whitminster, in particularly Whitminster CoE Primary School which is less than 100m to the south east of the application site. Whilst other local facilities (including bus stops) are located towards the east of the village they are all within a 5-10 minute walking distance of the site and therefore fully accessible to the application site without reliance upon the private car.
- 3.62 PS46 is supported to meet local needs, however, as shown in Appendix 9 the site could accommodate up to 60 dwellings (without harm) satisfactorily on that portion of the site that is currently proposed as an emerging allocation; consequently making an efficient use of land in accordance with the Section 11 of the NPPF (2019) and in a sustainable location. An illustrative layout (Scheme B) showing how up to 60 dwellings is included in Appendix 9.
- 3.63 Furthermore, Appendix 9 also provides additional information (which has been submitted to the Council) illustrating how around 100 dwellings (Scheme A) could be accommodated on a gross site area of 4.19 hectares having regard to the setting of the designated Industrial Heritage Conservation Area to the south west, the Grade II* Listed Wheatenhurst Church to the north west, and the desirability of maintaining separation between Whitminster and the group of buildings comprising Highfield House to the north west by providing landscaping/green infrastructure along the western and northern edges.
- 3.64 Appendix 9 demonstrates that the proposed allocation could be readily extended north-west of the site. Appendix 9 includes two illustrative masterplans.

APPENDIX 9: LAND WEST OF SCHOOL LANE, WHITMINSTER (PS46)

- 3.65 The SALA confirmed that there are no physical, environmental or heritage constraints preventing the development, both parcels to the west and to the east of School Lane have reasonable access to services and facilities in the local area.
- 3.66 In addition Appendix 10 illustrates for the land east of School Lane, Whitminster, which has a gross area of 6.20 hectares and could accommodate around 200 dwellings (Scheme 1) or around 100 dwellings on part (Scheme 2).

APPENDIX 10: LAND EAST OF SCHOOL LANE, WHITMINSTER

- 3.67 Land East of School Lane was included in the SALA May 2017, (ref WHI001) There are no significant physical constraints. Whitminster is a third-tier settlement in adopted Policy CP3 of the Stroud Local Plan (2015) and is a Tier 3a settlement in the proposed Draft Local Plan. As referred to above Whitminster provides a range of local services and facilities that meet the day-to-day needs of residents, including a Primary School, convenience store and post office, 2 no. pubs / restaurants, a village hall, children's play area and playing fields. The village is also served by regular bus services between Gloucester and Dursley that stop outside the Whitminster Inn on the A38.
- 3.68 Whilst the site lies outside the existing settlement boundary for Whitminster it adjoins existing built form and the existing settlement boundary to the south east and a number of residential properties. The site adjoins agricultural land to north, east and, on the opposite side of School Lane, to the west with houses on Holbury Crescent to the south. The site is therefore well related to the existing built form of Whitminster.
- 3.69 The site is also well related to existing local facilities in the village of Whitminster, in particularly Whitminster CoE Primary School which is less than 100m to the south east of the application site. Whilst other local facilities (including bus stops) are located towards the east of the village they are all within a 5-10 minute walking distance of the site and therefore fully accessible to the site without reliance upon the private car.
- 3.70 There are no known physical constraints that would prevent development of this site. The site is relatively level; a public footpath crosses the site, there are no known ground contamination or land stability issues; there is good access to School Lane; there is reasonable access to services and facilities in the local area.
- 3.71 The latest Landscape Sensitivity Assessment (2016) has identified the site (ref changed to Wh04) as Medium sensitivity to Housing Use and High sensitivity to Employment use.
- 3.72 An initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to any designated heritage asset.
- 3.73 An initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to any designated

natural environment site. The assessment did not consider whether there are protected species on this site.

3.74 The SALA (2017) concluded that:

“Although not currently policy compliant, there may be some potential for housing development in the future on the south eastern part of the site, south east of the public right of way, should the Local Plan strategy identify the need for growth in this location although substantial tree screening on the North Eastern boundary would be necessary to limit the impact on views from the north, north east and east. Employment development is not suitable.”

3.75 It is noted that the SALA considers the development potential of the site,

“Taking account of the character of the site and its surroundings, the south eastern part of the site could be developed for medium density development typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of about 25dph, and the suggested yield is 45 units.”

3.76 The site is environmentally unconstrained and will not lead to any harm in terms of impact on highway safety, flooding, heritage assets, landscape or biodiversity. The proposed development is therefore considered to represent sustainable development in accordance with paragraph 11 of the NPPF (2019) with no unacceptable adverse or severe impacts that would significantly and demonstrably outweigh the benefits of delivering housing in a sustainable location which would contribute towards the Council’s five-year housing land supply requirement.

3.77 The LUC (2019) Sustainability Appraisal that accompanies the consultation indicates at in Appendix 5 page 125 Table A5.1 that the site performs well compared to other submitted sites at Whitminster. The site has no discernible impact on the historic environment or water quality, climate change or waste while it is judged as having a minor positive impact on housing, health and economic growth. However, it concludes in Appendix 7 page 694 that:

“Draft Local Plan Stage: Having considered the scale of growth appropriate for this settlement set out in the Draft Plan and the benefits and disbenefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development.”

3.78 The development of both sites at Whitminster is not dependent on the other and could be delivered separately or together. Both parcels are unconstrained and deliverable in the short term. Housing delivery programmes for both sites are provided in the respective appendices.

Land at Grove End Farm

3.79 Land at Grove End Farm was considered in the SALA (New Sites Update Report October 2018) as WHI007, and part (1.3 hectares) outside of that being promoted by Robert Hitchins Ltd, was identified in the 2018 Assessment as having future potential for low density rural commercial development.

3.80 The site is not constrained. The SALA concluded for WHI007 that there were no known physical constraints preventing development. The site is gently sloping; there are no known ground contamination or land stability issues. Access to the site is from the A38. There is reasonable access to services and facilities in the local area.

3.81 In addition to land promoted reference (WHI007) there is land to the north comprising 59.90 hectares.

3.82 In total both land parcels comprise approximately 101 hectares.

3.83 The entire site adjoins the Whitminster Local Centre to the north, the M5 motorway to the south east, the A419 to the south west, the A38 to the south west and open countryside to the north east.

3.84 While the site is situated outside the identified Whitminster settlement boundary it adjoins the built form of the settlement to the north comprising the local centre which includes a pub, restaurant and retail facilities and the Highfield Garden World/Retail Centre, Whitminster to the east of the A38. The western boundary of the site abuts two linear groups of residential development that front the A38, but are situated outside the settlement boundary.

3.85 The northern part of the site is also well located to other services and facilities that are located to the east of Whitminster village in close proximity to the A38 including public transport services to Gloucester, Stonehouse and Stroud. Whilst the southern part of the site is adjacent to the A419 leading to junction 13 of the M5.

3.86 The SALA assessment for WHI007 refers to the site being part of a larger parcel identified in the Landscape Sensitivity Assessment (ref Wh07), which extends northwards beyond the site, (although Wh07 only corresponds to the area close to the A38 i.e. two fields running in a north south direction, south of Grove Lane in WHI007). The Landscape Sensitivity Assessment (ref Wh07 also included three field areas running north of Grove Lane to the animal shelter).

3.87 Landscape Sensitivity Assessment for all the fields in ref Wh07, considered the land to be in an area of High/Medium sensitivity to housing use and Medium sensitivity to Employment use. It is important to note that only the north western quadrant of our client's site is considered by this study.

3.88 The south western boundary of the site is situated adjacent to the boundary of the Industrial Heritage Conservation Area (IHCA), but is separated from it by the A419.

3.89 The SALA update 2018 which only refers to the southern part of the site states that:

"There are no known physical constraints that would prevent development of this site. The site is gently sloping; there are no known ground contamination or land stability issues. Access to the site is from the A38. There is reasonable access to services and facilities in the local area."

3.90 It continues:

"An initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to a designated natural environment site."

3.91 The SALA provides a summary of the suitability of the southern site which is misleading as it states that the site is not suitable for housing development because of the landscape sensitivity of the site. However, the whole site has not been assessed in the Landscape Sensitivity Assessment of 2016. The SALA then states:

"Although not currently policy compliant, there may be future potential for some employment development in the northern corner of the site, adjoining Grove End Farm, should the Local Plan strategy identify the need for growth in this location. The development would require appropriate landscaping to allow screening and integration into the landscape." (my emphasis)

- 3.92 The SALA assessment of development potential concludes that the site (WHI 007) is suitable for employment uses:

“Taking account of the character of the site and its surroundings, the small field southwest of Grove End Farm adjacent to the A38 and the triangular parcel of land southeast of existing buildings on Grove Lane could be developed for low density rural commercial development typically comprising single storey offices, light industrial or small format warehousing units.”

- 3.93 Pegasus considers that the Council’s assessment is only for part of the site. The whole site needs to be considered. A baseline assessment has been undertaken for the whole site and is included in the Position Statement – Appendix 2. The site is a highly sustainable location, at the junction of the A38/M5 and the A419 corridors, equidistant from and accessible to (including by public transport) Stroud, Cam/Dursley and Gloucester.
- 3.94 This is a sustainable alternative to development proposed at Sharpness and Wisloe.
- 3.95 The land is in the control of a single landowner, provides for employment in an attractive market location, is unconstrained by designation and subject to an appropriate disposition of development (having regard to the Conservation Area to the south of the A419, existing public rights of way, and site topography) can be readily delivered to meet needs/requirements in the Plan period.
- 3.96 The site is not subject to any specific landscape designations, nor does it have any heritage constraint, it would be possible therefore to design a form of development that respects the landscape setting when viewed from local receptor points, including the public rights of way within the site.
- 3.97 The sensitive development of the site is therefore considered to represent sustainable development in accordance with paragraph 11 of the NPPF with no unacceptable adverse or severe impacts that would significantly and demonstrably outweigh the benefits of delivering housing in a sustainable location which would contribute towards the Council’s five-year housing land supply requirement.
- 3.98 It is considered that the site is well related to the strategic road network for employment purposes and once finer grained landscape evidence is prepared

development at the site could be accommodated without a significant negative impact on the landscape setting.

3.99 The site has a capacity for approximately 2,250 dwellings, significant employment opportunities with all the facilities and services to support a new community.

3.100 In section 2 of the representations, the merits of land at Grove End Farm as an alternative location for development to that proposed at Sharpness, have been set out.

APPENDIX 2: POSITION STATEMENT – LAND AT GROVE END FARM, WHITMINSTER

3.101 It is considered that land at Grove End Farm, Whitminster, which is at the confluence of the A38/M5 and A419 corridors, well related to Stroud/Stonehouse, Cam/Dursley and also Gloucester, provides the opportunity to achieve a mixed use development in a highly sustainable location (being well connected to public transport).

4. Homes and Communities

Core Policies

- 4.1 It is considered that the Core Policies in this section should be reviewed in the light of the NPPF 2019 and the emphasis on Strategic Policies and Non-Strategic Policies.
- 4.2 The NPPF states that Plans should be explicit about which policies are strategic policies. Where a single local plan is being prepared the non-strategic policies should be clearly distinguishable from the strategic policies. Strategic policies are limited to those necessary to address the strategic priorities of the area.
- 4.3 Paragraph 28 of the NPPF states that:

“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.”

Core Policy CP7 Lifetime communities

- 4.4 Whilst the review does not propose any amendments to this, the concerns raised through consultation responses in respect of the wording when it was prepared for the current adopted Stroud Local Plan still hold true and were not addressed by the reporting Inspector at that time round.
- 4.5 Representations are provided by Pioneer and attached at Appendix 11. The representations question the lack of any review of this policy which is particularly vague in terms of how it is intended to be applied, resulting in the potential for burdens to be imposed on development that cannot be known by those seeking to bring sites forwards / purchase land and which cannot have been viability tested either in the past or presently.

APPENDIX 11: REPRESENTATIONS BY PIONEER ON POLICY CP7

Core Policy CP8 New Housing Development

- 4.6 The Plan proposes changes to Core Policy CP8 to *“strengthen the need for major sites to broadly match the size type and tenure of housing identified as needed within the Local Housing Needs Assessment.”* Representations are provided

by Pioneer and attached at Appendix 11. Proposed amendments to the policy wording are included in the representations.

APPENDIX 11: REPRESENTATIONS BY PIONEER ON POLICY CP8

Core Policy CP9 Affordable Housing

- 4.7 The proposed changes reflect the thresholds set out in the NPPF 2019. The Local Housing Need Assessment does not support that affordable housing should be pro-rata the market housing mix (which the current Policy CP9 wording would essentially enable the Council to seek). Detailed representations have been prepared by Pioneer and highlight the following:
- 4.8 The recent November 2019 Bishops Cleeve Appeal Decision (reference 3229581) suggests that the s106 costs that developments are actually likely to be expected to bear could add up to almost c.£18.5k per dwelling. Anecdotal evidence, and the experience of Robert Hitchins Ltd themselves, suggests that local authorities (albeit inappropriately) are similarly seeking hugely increased per unit s106 sums from applicants across sites of various sizes following the Bishops Cleeve decision. The £1k per unit s106 cost assumption in the District Council's viability evidence base is simply not enough to cover the s106 cost burdens placed on development even before this turn of events.
- 4.9 Should Stroud District Council seek to follow suit with other Gloucestershire local authorities and seek to impose hugely increased s106 costs (largely it appears as a result of County Council education infrastructure demands) then the impact of this upon plan delivery needs to be re-assessed as a matter of urgency. A failure to do so is likely to render existing Plan and emerging policies unviable resulting in the Council being unable to deliver new homes. Certainly, continuing to seek items such as affordable housing at current and proposed levels will be unlikely to be possible.
- 4.10 Detailed representations are attached at Appendix 11

APPENDIX 11: REPRESENTATIONS BY PIONEER ON POLICY CP9

Delivery Policies

- 4.11 The Plan states that the Delivery Policies add detail and interpret and apply the Plan's development strategy and core policies. It is noted that the Draft Plan proposes some new policies and changes to some of the adopted Local Plan

policies. It is considered that these policies should be referred to as non-strategic policies consistent with the NPPF 2019.

Delivery Policy DHC1 Meeting Housing Need within defined settlements

- 4.12 This is not a new contain any material changes to housing policy, but reflects a restructuring of the Plan.

Delivery Policy DHC2 Sustainable rural communities

- 4.13 Pegasus supports this new policy as it accords with the NPPF and recognises the contribution that smaller sites can make to meeting housing needs.

Delivery Policy HC3 Self-build and custom build housing provision

- 4.14 There is no basis for imposing an obligation on applicants for self / custom build plots within national policy or the underlying legislation. The PPG provides advice on self-build. There is no basis in the legislation or within national policy for imposing an obligation on applicants (of any size site) to hive off a section of their site to be sold as self-build plots – it is the Council’s responsibility, not that of a land owner or developer, to ensure that sufficient permissions are given to meet demand.
- 4.15 A policy approach for a proportion of self/custom build serviced plots on housing sites of certain size is not supported as it changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. If these plots are not taken forward then undeveloped plots are effectively removed from the housing supply unless the Council provides a mechanism whereby these plots may be developed by the original non self/custom builder in a timely manner.
- 4.16 Detailed representations on this policy are provided by Pioneer at Appendix 11.

APPENDIX 11: REPRESENTATIONS BY PIONEER ON POLICY HC3

5. Economy and Infrastructure

5.1 This section refers to policies which “sit at the heart of the Plan” and are the “principal means of delivering the Plan’s strategic objectives in relation to economic growth, jobs and infrastructure. Consideration should be given to which policies are strategic and which are non-strategic in line with NPPF 2019.

Employment Growth and strategic employment needs

Core Policy CP11 New Employment development

5.2 It is noted that criteria 2 in respect of the location of new industrial or business development states that such locations should be “*readily accessible by public transport, wherever possible, and by bicycle and foot, or contribute towards provision of new sustainable transport infrastructure to serve the area, in order to make the development accessible by those modes.*” Consequently it is considered that strategic locations for growth should accord with this policy criteria.

Travel and Transport

Policy CP13 Demand Management and sustainable travel measures

5.3 It is noted that this policy states:

“In all development cases, schemes shall:

- i) Be located where there are, or will be, at the time of development, choices in the mode of transport available and which minimise the distance people need to travel.**

...Development proposals will be expected to consider all possible sustainable transport options before the capacity of the road network is increased.”

5.4 On the basis of the current proposal, it is not clear how the proposed Garden Village at Sharpness will satisfy this policy.

5.5 Similarly in respect of Delivery Policy EI12 Promoting transport choice and accessibility. There is clearly an emphasis in the policy on development be located in areas already well served by public transport.

“...All developments should be planned in line with the Sustainable Transport Hierarchy. In the first instance, opportunities to reduce the need to travel should be maximised, including through the provision of ancillary facilities on-site and through measures which enable people to work from home, such as high speed broadband. Development should be located in areas which are already well served by public transport and

have access to a range of local facilities within walking and cycling distance...”

- 5.6 Furthermore the policy states that for new developments, walking and cycling and public transport measures will be required to be in place as early as possible to ensure that opportunities for sustainable travel are available to support early occupiers in establishing travel patterns. Again and as referred to above and in earlier sections of these representations it is not clear how the proposed Garden Village at a remote location as Sharpness will satisfy these policy requirements.

Delivery Policy DEI1 District wide mode specific strategies

- 5.7 Land at Grove End Farm, Whitminster being adjacent to the A38 and A419 (which the STS has identified as being key bus corridors is capable of delivering express high frequency limited stop services to key destinations) and is ideally placed to facilitate an interchange facility adjacent to M5 J13.

6. Our Environment and surroundings

6.1 As referred to in the previous sections, Core Policies which “sit at the heart of the Plan” and are the “principal means of delivering the Plan’s strategic objectives in relation to the environment should be strategic policies. Consideration should be given to which policies are strategic and which are non-strategic in line with NPPF 2019.

Delivery Policy ES1 Sustainable construction and design.

6.2 It is considered that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.

6.3 The government is currently consulting on The Future Homes Standard and as part of that consultation it is proposing to remove the ability of Local Planning Authorities to set higher energy efficiency standards than those in Building Regulations which has led to disparate standards across the country and inefficiencies in supply chains. The Government wants to create certainty and consistency. An uplift to Part L standards in 2020 will improve the energy efficiency of new homes and prepare housebuilders and supply chains in readiness for the further uplift in 2025 to meet the Future Homes Standard so there is no need for LPAs to seek higher standards.

Delivery Policy ES12 Better Design of places

6.4 It is noted that Core Policy 4, states that “all development proposals shall accord with the Mini Visions and have regard to the guiding principles for that locality” as set out in the Plan, and shall be informed by other relevant documents, such as any design statements adopted as Supplementary Planning Documents (SPD).

6.5 However, under Delivery Policy ES12, all new development must be based on thorough site appraisal including reference to any adopted Design Statements, Design Codes, Neighbourhood Development Plans and Secured by Design standards.

6.6 It is considered that references to guidance and SPDs should not be interpreted by Development Management Officers as conveying the weight of a Development Plan Document onto guidance, particularly as such documents have not been

subject to examination and does not form part of the Local Plan. These references should be removed. If this text is then included in the supporting text to the policy, the text should be clear that development proposals should “have regard to” rather than “accord with” any such standards and guidance.

7. Delivery and Monitoring

7.1 According to the PPG the plan is an opportunity for the strategic policy-making authority to set out a positive vision for the area the plan should also be realistic about what can be achieved and when. This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought forward.

7.2 Start to Finish NLP (2016) states that:

“Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period.”

7.3 The NLP research concluded that on average is is 6.1 years for the planning approval period of schemes 2,000+. The average for all large sites is 5 years.

7.4 The housing trajectory in Table 6 sets out the anticipated delivery for the proposed strategic sites. We have already set out our objections to PS36 the proposed new settlement at Sharpness and also PS37 the proposed new settlement at Wisloe. The Start to Finish Report, NLP, November 2016 identifies that on average for sites of this size it would take circa 5.5 years from the validation of the first planning application until the first completion. In which case in order to achieve the delivery rates anticipated in Table 6, applications for both sites would need to be submitted now.

7.5 For example, the trajectory assumes from the Wisloe site that 50 dwellings will be completed in the period 2020 – 2050. In reality it can be assumed that given average lead in times it would take 6.5 years until the site started to deliver e.g. in 2026. In theory the site could just about deliver 1,500 dwellings in the plan period.

7.6 However, for Sharpness a lead in time according to the NLP research for a site of this scale would be 7 years, in which case if an application was submitted in mid-2020, the first completions would not be until 2027/28. Consequently even if the Council’s rates are applied the site would not delivery in its entirety in the plan period. Only about 1,940 dwellings would be delivered and there would be a shortfall of approximately 460 dwellings.

7.7 The NPL research concluded on lead in times that :

“On average, larger sites take longer to complete the planning application and lead-in processes than do smaller sites. This is because they inevitably give rise to complex planning issues related to both the principle of development and the detail of implementation.”

7.8 It has been established in numerous Local Plan examinations that the supply should exceed the housing need to provide sufficient contingency to ensure that the need will be met. In the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy examination, the Inspector required that the housing requirement was set 5% above the housing need. Without such contingency, it is very likely that the housing requirement will not be met across the plan period as the delivery of a proportion of sites will inevitably be delayed.

7.9 A detailed housing trajectory needs to be provided to support the Plan.

APPENDIX 1

MOVEMENT CORRIDORS FROM THE STROUD SUSTAINABLE TRANSPORT STRATEGY (NOVEMBER 2019)

APPENDIX 2

POSITION STATEMENT - LAND AT GROVE END FARM, WHITMINSTER

APPENDIX 3

LANDSCAPE AND VISUAL APPRAISAL PS19A NORTHWEST OF STONEHOUSE

APPENDIX 4A

WIDER CONTEXT PLAN FOR PS19A NORTHWEST OF STONEHOUSE

APPENDIX 4B

DEVELOPMENT FRAMEWORK PLAN NORTHWEST OF STONEHOUSE INCLUDING SCHOOL SITE – JULY 2019

APPENDIX 5

LAND SOUTH OF BRISTOL ROAD, STONEHOUSE (INCLUDING INDICATIVE PLANS AND A HERITAGE ASSESSMENT) - AUGUST 2019

APPENDIX 6

LAND SOUTH EAST OF NUPEND

APPENDIX 7

LAND ADJACENT TO TILSDOWN HOUSE - MASTERPLAN

APPENDIX 8

LAND WEST OF DRAYCOTT, CAM PRELIMINARY ILLUSTRATIVE MASTERPLAN

APPENDIX 9

LAND WEST OF SCHOOL LANE, WHITMINSTER

APPENDIX 10

LAND EAST OF SCHOOL LANE, WHITMINSTER

APPENDIX 11

REPRESENTATIONS BY PIONEER ON POLICIES CP7, CP8, CP9 AND HC3