

**Via email only**

Development Services  
Stroud District Council  
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GL5 4UB

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20 January 2020  
KF Ref – 1115

Dear Sir/Madam

**REPRESENTATIONS TO STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT PLAN  
MAYOS LAND PHASE 3, LAND EAST OF BRISTOL ROAD, HARDWICKE**

These representations have been prepared by Knight Frank on behalf of Newbridge Construction Ltd (the landowner) in relation to land east of Bristol Road, Hardwicke and the Stroud District Local Plan Review: Draft Plan consultation which closes January 2020.

Our client is the owner of the site in Hardwicke which is located outside of, but directly adjacent to, the current Hardwicke settlement boundary as defined by the adopted Local Plan Policies Map (2015). These representations set out our general comments on the proposed Draft Plan document as well as promote the site to the east of Bristol Road for allocation for residential development site allocation. The representations seek to promote a revision to the Hardwicke Settlement Boundary to include the site.

The site was submitted to the 2018 Strategic Assessment Land Allocation (SALA), as site ref. HAR014. The site was found to have future potential, being available and achievable, but unsuitable due to its location outside of the settlement boundary. The indicative capacity stated in the SALA is 15 dwellings.

**Site Location and Context**

The site comprises 0.71ha and is located in Hardwicke, outside of but immediately adjacent to the Settlement Boundary as defined by the adopted Local Plan Policies Map. It is bound by built development on all sides, with residential dwellings to the north, a single row of dwellings to the west, along with dwellings to the south and an industrial estate situated to the east on the other side of the A38. The site benefits from the following:

- ◆ Outside of conservation area and outside of the Cotswold AONB
- ◆ No listed buildings on site or in vicinity of site
- ◆ Entirely within Flood Zone 1

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◆ No statutory or non-statutory designations

Additionally, the site has mature flora to the east providing good screening from the A38, and is level with new housing to the north. The site is laid to grass with a scattering of trees, none of which are subject to TPOs. There are some concrete footings/areas of hardstanding on the site.

A site plan is appended to this representation.

### **Site Deliverability**

National Planning Practice Guidance sets out that when judging the deliverability of a site for plan-making purposes an assessment should be made regarding the suitability, availability and achievability of a development occurring. These factors are addressed in turn below.

#### Suitability

The site is undeveloped land adjacent to Hardwicke, and in close proximity to the Hunts Grove and Kingsway developments.

The site is well-located at the settlement edge with good accessibility to local employment and services, including but not limited to local business parks at Waterwells and Quedgeley East, and retail and leisure areas, public transport links including bus stops along Bristol Road and the Waterwells Park and Ride, and community / education facilities.

The site is within a wider parcel of land that is bound by the A38, B4008, and the M5. Its development is a logical infilling in an otherwise suburban context and would not lead to any issues of encroachment into the countryside or have any effects on wider landscape character.

As set out above, there are no key constraints that would prevent development coming forward. It is noted that the SALA states that the site is partially within Flood Zone 2 and 3; however the most up to date EA Flood Map shows the site as entirely Flood Zone 1 (lowest risk).

#### Availability

The landowner owns the freehold of the full extent of the site outlined in the attached plan. The landowner fully supports these representations that are submitted on their behalf and confirms there are no legal or ownership disputes. The site is owned by an experienced and willing developer that has a track record of delivering residential sites within Stroud District, including Mayo's Land Phases 1 & 2 (Ref. S.13/2117/OUT) and land at Whitminster (Ref. S.14/0716/OUT).

#### Achievability

Should the site be required for residential development, the scale of development achievable on the site would lend itself towards delivery within 0-5 years of achieving an implementable planning permission. We understand that it is unlikely to require any additional infrastructure over and above that which is needed for its immediate connections to existing infrastructure.

Any proposal for development would include a mix of housing based on market and policy requirements at the time any detailed scheme is being drawn up. There is strong market demand for housing in this location which would further boost build-out rates and achievability within a 0-5 year timescale.

### **Stroud District Local Plan Review: Draft Plan**

The overall direction of the Plan's vision is supported, including the designation of Hardwicke as a 'Tier 3a Settlement – Accessible Settlement with Local Facility', and Hunts Grove as a 'Tier 2 Settlement – Local Service Centre' where development/growth will be focussed, is largely supported.

However, we consider that the Draft Plan contains policies which are either unclear, inconsistent with national policy, not positively worded, or fail to maximise the development and growth opportunities available.

As such, we provide our comments on the relevant policies in the subsequent sections below.

#### Core Policy CP2 and Core Policy CP3

##### *Minimum Housing Target*

The strategy set out at CP2 to deliver 'at least' 12,800 additional dwellings for the period 2020-2040 is supported. However, despite the useful inclusion of a 'level hierarchy', no additional guidance is provided within the policy itself or the supporting wording which provides an indication of how the housing target is expected to be apportioned across the four levels outside of the strategic and local development sites.

Strategic and local development sites provide cumulatively a maximum of 8,725 new dwellings across the Plan period, leaving a deficit of a *minimum* of 4,075 new dwellings to be accommodated across the District in the Plan Period, providing full delivery of all allocated sites. While CP3 goes on to set further definitions of acceptable development within, adjoining, and outside of the Settlement Development Limits (SDLs), no indicative figures are given of the expected housing target across the different levels.

We consider without any further guidance within Core Policy CP2 and Core Policy CP3, the hierarchy designation fails to adequately spatially guide appropriate development across the District in the most sustainable manner. A possible way to rectify this could be to identify indicative housing targets for each 'Parish Cluster' area, including a windfall allowance, based on each area's respective sustainability credentials and capacity to accommodate development.

##### *Local Development Sites.*

It is considered that the Plan could have taken additional positive steps to adequately Plan for the development of sites across the whole Plan period by prioritising the allocation of small and medium sized sites. NPPF Paragraph 68 sets out that such sites make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly, with a recommendation that land be identified for at least 10% of the areas housing requirement on sites no larger than one hectare.

There is no justification made within the Plan regarding the selection process of Local Development Sites. It is noted that most, but not all, Tier 1, Tier 2, and Tier 3a sites contain Local Development Sites, however no justification is made for this selection. To ensure soundness, the Plan should include a uniform, justified, approach to the allocation of Local Development Sites.

On this basis, we consider that the site to the east of Bristol Road should be considered for allocation as a Local Development Site. Being under a hectare, and already found to be available and achievable in the 2018 Strategic Assessment Land Allocation, it is likely that the site would be capable of being built out quickly and providing much needed housing. The site is also strategically and sustainably positioned between the existing built up area of Hardwicke, and the forthcoming Hunts Grove development, with good access to Harwicke as well as the anticipated new Local Centre of Hunts Grove. A small scale development here will be delivered in a short timescale and would complement the large scale proposals nearby, which will take considerably longer to deliver.

### Gloucester Fringe Strategy and SDL

The general strategy for Gloucester Fringe is supported, including the designation of significant housing and employment developments to add to the existing Hunts Grove development and extension of Hardwicke to the south.

The strategic accessibility of Hardwicke and the Gloucester Fringe should be better acknowledged; regardless of whether a higher order of services and facilities lie in the adjoining Gloucester City authority instead of Stroud District. In light of this, the Plan should take a more flexible approach to small-scale development that abuts the urban edge in this location.

The Settlement Development Limit (SDL) for Hardwicke currently does not include any of the residential development to the east of Bristol Road (B4008), despite this area being an established residential area that is part of Hardwicke. It is considered that the SDL should be amended to include this area, whilst Mayos Land Phase 3 should be shown as a Local Development Site for around 15 dwellings.

### Core Policy CP9 – Affordable Housing

Following publication of the updated Framework in February 2019 which added a number of new tenures to the definition of 'Affordable Housing', we consider the Local Plan should acknowledge, identify, and include the full range of affordable housing tenures which are considered acceptable, including: Affordable housing for rent, starter homes, discounted market sales housing, and other affordable routes to home ownership (See NPPF Paragraph 62 and Annex 2).

### **Conclusion**

These representations have been prepared by Knight Frank on behalf of Newbridge Construction Ltd in relation to land east of Bristol Road, Hardwicke and the Stroud District Council: Draft Plan consultation which closes on 22<sup>nd</sup> January 2020.

Our client is the owner of the site to the east of Bristol Road which is located outside of, but directly adjacent to, the Hardwicke settlement boundary as defined by the adopted Local Plan Policies Map. These representations provide our general comments on the policies set out within the Draft Plan, in addition to promoting the site east of Bristol Road for a local development site allocation.

We trust the above is clear, however, if further information is required or you have any queries, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature]

[Redacted name]

Senior Planner