

Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="√"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Pegasus supports the identification of Stonehouse as a Tier 1 settlement in the Pre- Submission Draft Local Plan. 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.

Whilst the allocation is supported we do have detailed comments/objections to the wording of the policy and these are set out in section 6 below – Proposed Modifications to the wording of the Policy.

Policy PS19a Stonehouse North West

The name of the site should be consistently referenced throughout the Plan, the Strategic Site Allocation Policy PS19a refers to the site as “Stonehouse North West”, but the supporting text has a heading “Land north west of Stonehouse” and the first paragraph of the policy is “Land Northwest of Stonehouse (in Standish Parish).”

“Land Northwest of Stonehouse in (Standish Parish)” is a proposed allocation in the emerging Stroud Local Plan and is located immediately adjacent to and to the north of the emerging neighbourhood of Great Oldbury (2015 Local Plan allocation West of Stonehouse) and west of the Bristol - Birmingham railway line, within the parish of Standish.

Land Northwest 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.

The majority of land within PS19a Land Northwest of Stonehouse has been promoted by Pegasus on behalf of Robert Hitchins Limited. The principle of development in this location is supported, at the time of preparing these representations a planning application is in preparation for up to 635 dwellings, a primary school, associated works, open space and landscaping with access.

Access to the site would be via the adjacent Great Oldbury development (Policy SA2 in the adopted Local Plan 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.

The application is for the majority of the proposed allocation as shown in the attached Position Statement. An emerging illustrative masterplan has been prepared informed by extensive environmental investigations and the public consultation that took place earlier this year.

Appendix 1 Position Statement Land North West of Stonehouse.

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 Great Oldbury which will ensure at least a 30-minute weekday 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 the recent improvements to the A419 Corridor which comprised both capacity improvements and improvements to pedestrian and cycle routes. The A419 is a ‘Main Movement Corridor’ as defined in the ‘Stroud Sustainable Transport Strategy’ (February 2021), where it is envisaged that an integrated package of initiatives can be delivered with a focus on sustainable travel modes.

New pedestrian and cycle links will connect the development to the surrounding network of routes ensuring residents will have good access to key local facilities which will encourage sustainable travel.

The traffic impacts of the proposed development will utilise outputs from the Stroud Local Plan Traffic Modelling (March 2021) which includes 2040 future year forecasts including the allocation on Land Northwest of Stonehouse. A request to GCC and SDC has been made for obtaining model outputs to establish the traffic impacts of the proposed development on the surrounding highway network for the weekday AM and PM peak hours. This will help establish the mitigation needed to accommodate the additional traffic from the proposed development.

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.

On behalf of the applicants an archaeological desk-based assessment has been undertaken for the Site, along with a geophysical survey and a trial trench evaluation. These investigations confirmed the presence of an Iron Age enclosure and round-house in the northern part of the Site. A large but shallow Medieval pit was recorded in the central part of the Site, the function of which is uncertain. All the archaeological features had been truncated by historic and repeated agricultural activity and are not considered to be of any more than local significance.

The report by White Consultants – Evaluation of Site Landscape and Visual Issues report for Stroud District Council (October 2019) identified the site as a potential candidate site, it recognised the area forms an extension of Stonehouse northwards. However, the report concluded 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.”*

A Landscape and Visual Appraisal has been prepared for the site by MHP Design Ltd Chartered Landscape Architects on behalf of the applicants 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.”

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).

It is anticipated that the Site could deliver around 100 dwellings per annum.

The Local Plan is expected to be submitted to the Planning Inspectorate in September 2021 for examination. It is assumed that outline planning permission will be granted in summer 2023, with the first reserved matters submitted in summer 2024. House building would commence in spring 2025 with the first completions by March 2026. With two outlets (assuming 50 dwellings per annum from each outlet), the site would be completed by Spring 2032.

The trajectory for Land Northwest of Stonehouse, included in Table 6 (page 306 of the Pre-Submission Plan) is incorrect as it has the figure of 1,350 dwellings for the site instead of 700 dwellings, which consequently means the figures in the columns are incorrect.

We have produced a Position Statement as requested by the Council to support the proposed allocation. This is attached at **Appendix 1**.

The Site is within the control of highly experienced employment and residential developer/promoters with a proven track record of delivering strategic sites in Stroud and indeed across Gloucestershire who have brought forward a number of mixed-use developments in the County (including the West of Stonehouse (Great Oldbury) Strategic Allocation under the adopted Stroud Local Plan).

Pegasus supports the proposed allocation PS19a Land Northwest of Stonehouse for a mixed-use strategic allocation in the Pre-Submission Draft Plan. 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 2026.

Despite supporting the allocation we do have some comments and objections to the proposed wording of Policy PS19a this is set out below in the suggested Modifications.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Modifications to the wording of Policy PS19a

1. Development brief and indicative masterplan

The second paragraph of the Policy refers to a development brief being prepared including an indicative masterplan to be approved by the Council, the brief is intended to detail the way in which the land uses and infrastructure will be developed in a co-ordinated manner.

It is noted that this appears to be the Council's approach for the strategic sites, however, in the case of PS19a and also PS24 work on the preparation of planning applications is already advanced and indicative masterplans (informed for example, by detailed landscape, heritage, ecological impact assessments and transport assessment) have been prepared and have been subject to public consultation as part of the preparation of the planning applications. The planning applications are being prepared in parallel with the drafting of the Local Plan, so that applications can be submitted as soon as possible. Development can then take place in order to support the delivery of housing in a timely manner in the plan period which is consistent with the overall national objective of boosting housing land supply.

An objection is therefore made to the unnecessary requirement in the policy for a development brief and indicative masterplan to be approved by the Council, this will in effect slow down delivery of housing etc. and consequently it will undermine the housing trajectory.

The following wording is suggested to replace paragraph 2 of the policy: *“The Proposals will be required to deliver a masterplan that has been informed by detailed landscape, visual, heritage and ecological impact assessments and demonstrates an appropriate scale, layout and form.”*

2. Plots for travelling showpeople

An objection is made to point 2 of the policy.

It appears that the need for 8 additional plots is proposed to be met on PS19a only. None of the other strategic sites are required to make any provision for travelling showpeople. There is no justification for any, let alone the entire district provision to be met at Stonehouse North West.

The requirement of 8 additional plots for travelling showpeople households in Stroud District is set out in the Gypsy and Traveller Accommodation Assessment para 1.39 (2017). It must be questioned how relevant this evidence is as it is 4yrs old.

Having received the Assessment in 2017, there appears to be no evidence of a Call for Sites for Gypsy and Travellers to help meet the accommodation needs of the District's Gypsy and Traveller communities, that the Council is looking to allocate through the Local Plan Review.

Furthermore, It is not clear whether the impact of such plots being included in the strategic allocation at Stonehouse North West has been taken into account e.g. the potential impact on land value, development viability and also potentially affecting the deliverability of the site.

The effect on viability, market forces and a realistic approach to delivery suggests that an inflexible approach in policy terms could result in a reduced speed of delivery or a sterilised site/part of a site crucial to the development strategy.

The approach needs to be consistent with the government guidance - Planning Policy for Traveller sites - there is no reference in the guidance to allocations being included on strategic sites.

3. No comment

4. 1.5 Primary School and contributions to secondary school

Our Educational Needs Assessment indicates that primary needs could be accommodated by the school currently being built at Great Oldbury or by its expansion, rather than providing on site. As referred to in response to Policy CP6, there is evidentially no need for early years or primary school places on this allocation and as such there is no requirement for on-site provision of a primary school including early years.

In terms of contributions towards secondary and further education, there is currently no evidence that there is a need for additional places and so similarly this policy requirement is not justified.

5. Contributions towards a new surgery at Stonehouse.

A surgery is normally commercially funded and is viable without the need for contributions. The Great Oldbury planning permission allows for D1 Uses in the Local Centre.

6. Accessible natural green space etc

It would be better to combine those aspects of policy where contributions might be required to mitigate into a single criterion worded along the lines of “the development will provide for necessary works and appropriate contributions to mitigate its impact on education, social and community infrastructure, and the transport network”. Examples could be given in the supporting text to the policy.

7. Impact on the Severn Estuary SAC/RAMSAR/SPA etc

The wording of the policy as currently written is not considered appropriate as it implies that on site mitigation is required which would be unrealistic to deliver. We are aware in terms of the Severn Estuary, there is already a mitigation scheme in place for developers to contribute to for impacts from development within a 7.7km impacts zone around the site. It is also understood that SDC, in co-operation with other nearby Councils, is going through the same process in relation to the Cotswold Beechwoods SAC. We would therefore suggest rephrasing this criterion to read:

“Consider any identified impacts in relation to the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC and to contribute to the approved SDC mitigation schemes or undertake an independent mitigation strategy as appropriate.”

8. No comment.

9. - 13. No comment.

12. Reference is made to “Manual for Streets”, clarification is sought whether this a reference to MHCLG/DOT publication rather than Gloucestershire County Council recently published Manual for Gloucestershire Streets. There are some issues with the preparation of the County Council’s version.

14. – 15. Only provided such a contribution can be justified as meeting the CIL Reg tests. It is suggested that the following wording is included:

“the development will provide for necessary works and appropriate contributions to mitigate its impact on education, social and community infrastructure, and the transport network”

This would obviate the need for criteria: 4, 6, 13, 14 and 16, 17 and 20.

16. Object to the statement contributions towards the re-opening of Stonehouse Bristol Road rail station, this has not been costed, no evidence has been provided and it is questionable whether it can be delivered in the plan period.

19. Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location.

This appears as a “catch all” phase. At this stage the IDP is not clear on what is required and can be justified to support the development of Stonehouse North West. An objection is made to Criterion 19.

20. Refers to phasing arrangements to ensure that employment land is developed and occupied in parallel with housing land completions.

An objection is made criterion 20 as it is unnecessary. The site is well located in respect of existing and proposed employment opportunities/land in the vicinity of the site and to link housing completions to the bringing forward of a specific employment site unnecessarily risks

housing delivery. In accordance with the Government objective of significantly boost the supply of homes, it is important that a sufficient amount of land comes forward for housing without delay.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

