

Stroud Local Plan

Examination in Public

Matter 2 – Spatial Strategy and Site Selection Methodology

Hearing Statement by Savills on behalf of L&Q Estates

February 2023



Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence?

Spatial strategy

2.4 Is the spatial strategy justified by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?

a. We consider that elements of the spatial strategy are not justified and that, as a consequence, the pre-submission draft Stroud Local Plan (SLP) fails to deliver a sustainable pattern of development which accords with paragraph 11 of the Framework. Our objections to the spatial strategy are confined to two discrete aspects: (i) the approach to testing of the reasonable alternatives and specifically the criteria used to select the preferred strategic allocations; and (ii) how the SLP addresses the future growth of Gloucester. We address each of these in turn.

1. Criteria Used to Select the Preferred Allocations

b. The only two occurrences of the term ‘spatial strategy’ in the SLP are in relation to the Nature Recovery Strategy at paragraph 6.51 and in the Glossary at Appendix E. In response to this question, we have therefore taken the ‘development strategy’s headlines’ (paragraphs 2.3.4 – 2.3.13) to be the ‘spatial strategy’ as this articulates what we would ordinarily consider to represent a spatial strategy and distribution of growth. Paragraphs 2.3.4 – 2.3.13 set out a broad, tiered approach which concentrates the largest growth at the main towns within the authority area, and cascades this down to the smaller settlements where a more limited scale of development is considered acceptable¹.

c. The rationale for this strategy is articulated in paragraph 2.3.5 of the SLP. We have no objection to this rationale. Indeed, a distribution of development which directs development to locations with good accessibility to services and facilities, and thereby reduces the carbon footprint of future residents, is

¹ The exception to this is the new communities which we will comment upon later.

entirely consistent with good planning practice and national policy on the delivery of sustainable development.

- d. Our objection to this spatial strategy and the reason why we consider that it not justified to the extent that it undermines the soundness of the plan, is in how this rationale has been applied to the distribution of growth. In simple terms, the strategy treats Stroud District as an island with no regard to what's happening beyond its administrative boundaries. This is most clear in the evaluation of the potential for development at Whaddon.
- e. Paragraph 2.4.14 of the Assessment and Selection of Sites Topic Paper (EB9) explains the authority's view on whether Whaddon might be allocated to meet the needs of Stroud District if it were not needed to accommodate growth from the neighbouring Gloucester City. In so doing it states that:

"The Emerging Strategy Consultation Paper (p35) had highlighted that there was potential to review how the sites at Whaddon and south of Hardwicke might contribute instead to Stroud District's future needs, should other alternative sites be preferred and/or if they were no longer needed by Gloucester. Whilst the Whaddon site is remote from any of Stroud District's Tier 1-3 settlements and does not generally conform to the emerging growth distribution strategy, arguably the land south of Hardwicke (a Tier 3a settlement, located within the rail/A38/M5 corridor, adjacent to what will become a Tier 2 settlement in the future) could do". [emphasis added]

- f. The first sentence in the quote above indicates that the initial starting point is that the land at Whaddon would be identified to meet the housing needs of Gloucester. Only if it is decided that the land is not required for this purpose is it then considered whether it should be allocated to meet Stroud's future needs. We have a fundamental objection to this being the starting premise upon which the site was considered through the plan-making process; an objection we address in our Statement to Matter 3. In the following paragraphs of this Statement we focus on the second sentence in the quote and the flawed justification for why the land should not be allocated to meet the needs of Stroud.
- g. It would appear that Whaddon was dismissed as a location to meet Stroud's needs simply because it is remote from a settlement within Stroud that falls within Tiers 1-3 of the hierarchy. This conclusion is

reinforced by paragraph 2.4.45 of EB9 which states that “*site G2 (Whaddon) was found to be a “poor” strategic fit*”. No regard appears to have been given to any other important considerations such as:

- (i) the sustainability of the location and potential development having regard to the Sustainability Appraisal or any other evidence;
 - (ii) consistency of the site with the ‘spatial strategy’ (aka the ‘development strategy headlines’);
 - (iii) the proximity to and relationship of the land with Gloucester to the north – a considerably larger settlement with a much wider range of services, facilities, education and job opportunities than any town or village within Stroud; or
 - (iv) the scale of the proposed settlement and the range of services and facilities that it would itself deliver.
- h. Instead, the development potential and the contribution it could make to meeting the needs of Stroud was simply dismissed because it does not adjoin a Tier 1-3 settlement. This does not represent a justified and sound basis upon which to plan for the growth of an authority.
- i. In the following paragraphs we briefly explain why these four factors should be taken into consideration in establishing a sound spatial strategy and distribution of development within the SLP.
- (i) Sustainability of the Location and Potential Development*
- j. Paragraphs 2.4.45 - 2.4.47 of the Assessment and Selection of Sites Topic Paper (EB9) claim that a comparative analysis of strategic housing sites and potential development growth points has been undertaken - an analysis which presumably justifies the selected outcome albeit without explaining why that is the case. These paragraphs refer to Appendix 2 of EB9 which contains a schedule comparing the outcomes of the Sustainability Appraisal (SA) undertaken for each potential location. It is quite clearly evident from the SA schedule that the land at Whaddon performs favourably when compared with other locations such as the new community at Sharpness.
- k. Notwithstanding, we have some concerns that the scoring in the SA is not representative of the true sustainability of the Whaddon site. Indeed, certain scores given to the site in the SA simply don’t make sense. For example, the site was given a ‘--’ for flooding. This conclusion appears to be based on the

mis-guided assumption that a large proportion of the site is at risk of flooding. That however is simply not the case. Only a small proportion of the site in fact floods and that area can easily be accommodated within the allocated area alongside the proposed scale of development.

- l. To address these shortcomings, we have produced an alternative / updated analysis of the site against the SA Objectives which is included in **Appendix A** to this Statement. This analysis demonstrates that the site performs even better and that there is a greater difference therefore between the land at Whaddon and other potential strategic development locations in so far as the SA objectives are concerned.
- m. No weight however appears to have been afforded to the output of the SA in determining which strategic development opportunities should be allocated for development. Whilst the SA is only a guide, if the SLP proposes to deviate from it, then there should be a good reason why a 'less sustainable' option has been selected.

(ii) Consistency of the site with the 'Spatial Strategy'

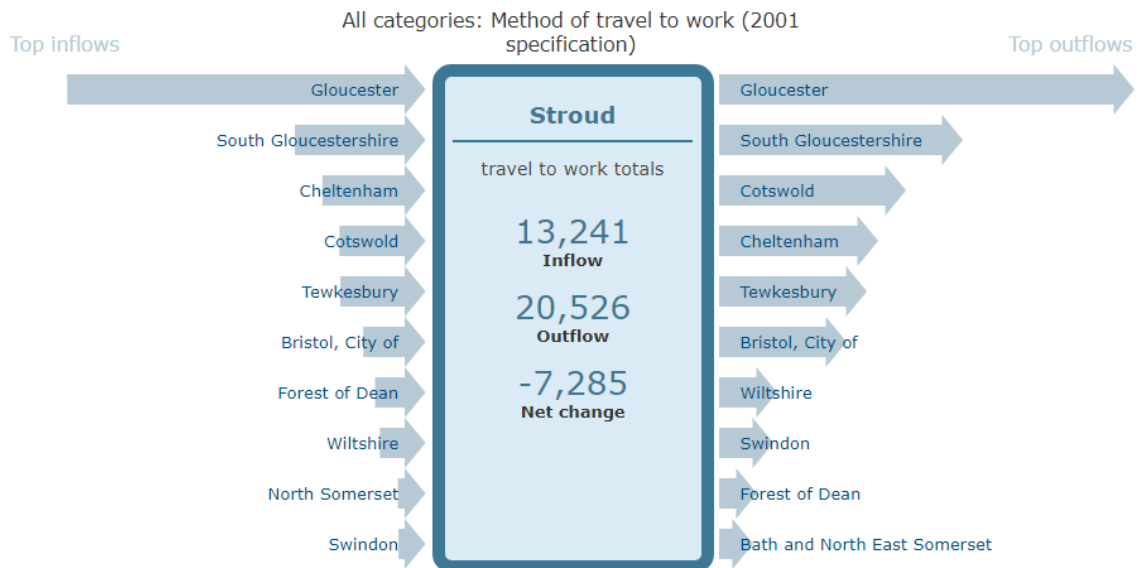
- n. Paragraph 2.3.5 of the SLP provides the guiding principle for the spatial strategy. It states that, in essence, the SLP will promote development at accessible locations to enhance sustainability and reduce the carbon footprint. We support this as a sound starting point for any local plan 'spatial strategy'.
- o. It is abundantly clear that the land at Whaddon has far superior access to a range of services and facilities within active (walk & cycle) and public (bus) travel range than other strategic development locations such as Sharpness.
- p. Within approximately three miles of the site is Gloucester city centre and with it a wide range of shops, including an outlet village, a hospital, recreational facilities including a cinema and variety of sports clubs. Much closer than this there are a range of supermarkets including a Tesco Extra and Asda both less than two miles away, alongside a vast array of employment opportunities. This wide range of services was part of the reason why the JCS Inspector commented positively upon the suitability of the location for strategic scale development – See **Appendix B**.



- q. If the primary objective of the SLP is to direct a proportionate quantum of growth to locations reflecting their accessibility to services and facilities then without doubt Whaddon represents one of, if not the, most accessible locations.

(iii) Relationship with Gloucester to the North

- r. Stroud District, as we all know, is not an island but part of a wider functional housing and economic market area – a fact which is clearly demonstrated by reference to employment and commuting patterns.
- s. The figure below has been taken from the ONS website showing the 2011 census data on travel to work patterns. Whilst it is now somewhat dated, until the 2021 census results are made available it is the most up to date evidence of commuting flows between authority areas. As can be seen at the time of the census there was a net outflow of 7,285 workers from Stroud to other authority areas for work purposes. By far the largest outflow from Stroud was to Gloucester. Based on this evidence there is clearly a strong functional relationship between the two authority areas.



- t. If it is truly the objective of the SLP to deliver development in a manner consistent with the principles established in paragraph 2.3.5 of the SLP then there is considerable merit in considering how land with good accessibility to Gloucester could contribute towards a sustainable pattern of growth within Stroud.

Doing so would meet the needs of Stroud but in a manner which recognises and responds to the functional relationship the authority has with its neighbour to the north.

(iv) Scale of the Proposed Settlement and the Range of Services and Facilities

- u. Dismissing further consideration of small residential development opportunities on the basis that they do not abut an existing Tier 1-3 settlement is arguably not unreasonable as there is little opportunity for small developments to contribute to the sustainability of the location; adopting such a criterion for a large strategic site however is irrational.
- v. Many of the Tier 3 settlements are relatively small villages with limited services and facilities. Frampton on Severn for example only has a population of 1,432 and has a range of services to match. Notwithstanding its proximity to a wide range of higher order services and facilities, the development proposed at Whaddon would also accommodate in the order of 3,000 dwellings and therefore circa 6,000 - 7,000 residents. The new homes would be accompanied by a wider range of services and facilities (including a new secondary school etc) than many of the existing Tier 3 settlements such as Frampton on Severn. It should make no difference therefore whether the land abuts an existing settlement if it is, in itself, capable of providing many of the needs of its residents as a part of the development.

Conclusion

- w. The rationale for dismissing the land at Whaddon as a means of meeting a proportion of the housing needs of Stroud is simply not justified. For the reasons explained above and in greater detail in our Statement to Matter 6e, the land at Whaddon represents a sustainable and deliverable location for growth. The alternative of the Sharpness new community, which is currently allocated in the SLP, is not well placed to deliver growth in a sustainable manner and does not accord with paragraph 11 of the Framework or the spatial strategy of the SLP.

2. How the SLP Addresses the Future Growth of Gloucester

- x. The SLP proposes to allocate sufficient land to meet the objectively assessed needs of the authority area and safeguard land to meet the needs of Gloucester. In the absence of a formal strategic planning mechanism that can manage cross-boundary growth we agree that it is sound in principle to either

allocate land now to meet the needs of Gloucester or to safeguard land for this purpose. Further justification for this is provided in our Statement to Matter 3 and to avoid duplication we do not repeat this here.

2.5 Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How were the locations for the two new settlements at Sharpness and Wisloe identified and was the process robust?

- a. We have no objection in principle to the reliance on large strategic development locations to meet a high proportion of the housing requirement. However, where this is the case, it is especially important that the locations selected are demonstrably deliverable during the plan period. For the reasons explained in our Statement to Matter 5, we have significant concerns over the Sharpness allocation in that regard.

2.7 Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?

- a. For the reasons explained above we do not agree that it is at all clear how the evidence base, especially the SA, has informed the location of development and the overall spatial strategy. Indeed, taken at face value the SA would lead to the conclusion that alternative allocations would result in a 'more sustainable' outcome. If there are good reasons for this departure, then it is not clear where in the evidence base they are explained. If the only reasons are those outlined in paragraph 2.4.14 of the Topic Paper (EB9) then, for the reasons outlined above, we do not consider the plan to be adequately 'justified' by the evidence and not therefore 'sound'.

2.14 Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council's vision?

- a. There are elements of the spatial strategy, namely the new community at Sharpness, which are presented in such a way that suggests the resultant development would accord with the strategic objectives and vision for the SLP. The reality however is very different and both the location and deliverability of the proposed development is such that we do not consider that it would achieve the

Council's aspirations for a sustainable new community which is consistent with the plan's strategic objectives and vision. The reasons for this are explained in our Statement to Matter 5.

Site Selection Methodology

We have made a number of comments in relation to the site selection methodology in our response to the questions above. To avoid unnecessary repetition, we direct the Inspectors to the comments made above.

Savills

1 February 2023



Appendix A – Alternative SA Assessment Scores

In this statement we contend that the Land at Whaddon is the most suitable and sustainable location for housing development within the Stroud District Council administrative area. To provide the context and justify this conclusion, we have assessed the site and proposed development against the sustainability objectives used in the SA Framework. In some cases this results in a different ‘score’ to that provided in the SA. The table below copies the score from the SA and against this provides the Savills alternative score for ease of comparison.

SA Objective	SA Score ²	Savills Score	Comments
SA 1: Housing	++	++	<p>The SA explains that the site has been identified as having the potential to meet Gloucester’s unmet housing needs and is therefore given a ‘++’ score.</p> <p>We agree with the score but not with the limited justification provided in the SA. The site not only has potential to meet the needs of Gloucester but also represents an entirely suitable and sustainable location to meet the needs of Stroud.</p> <p>The SA is not sufficiently refined to examine the market demand for, and therefore likelihood of, housing delivery on each of the proposed sites. Indeed, it simply assumes that all land allocated will deliver the housing consistent with the allocation policy. This simplistic approach ignores the variations in the housing market within Stroud and the inevitable risks that exist to delivery in some locations. Unlike certain other locations allocated within the Draft Plan there is (a) a demonstrable market demand for housing on the Land at Whaddon; and (b) a high level of confidence on the deliverability of the housing.</p>
SA2: Health	-/++	++	<p>We acknowledge that the site is not within 800m of a GP surgery, however, this appears to be an arbitrary distance and a misleading criteria against which to assess the ‘sustainability’ of a development location.</p>

² Based on the Draft Local Plan Score from Appendix 7 of the SA (November 2019), pages 556-557.

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SA Objective	SA Score ²	Savills Score	Comments
			<p>According to the Royal College of GPs, an average patient will visit a GP around seven times a year³. For a journey that takes place so infrequently it is far less important for the development to be located as close as 800m from the destination, as it is for a destination such as a primary school, secondary school or places of employment.</p> <p>For this reasons we consider that this SA Objective should be measured against the inherent health objectives secured through the provision of open space, for which the location has been scored as a '++'.</p>
SA3: Social Inclusion	0	0	Agree that the development proposals will have no bearing upon this SA Objective.
SA4: Crime	0	0	Agree that the development proposals will have no bearing upon this SA Objective.
SA5: Vibrant Communities	+	+	The land is greenfield as acknowledged in the SA, however, it will contribute towards the vibrancy of Gloucester City Centre and to other local community facilities, including those provided as part of the development. A score of '+' is therefore supported.
SA6: Services and Facilities	++	++	We agree with the conclusion in the SA that the Land at Whaddon should be scored '++' against this SA objective. There are a wide range of services and facilities accessible from the site on foot, bicycle or by public transport.
SA7: Biodiversity / Geodiversity	-/+?	+	<p>The land was scored as '-?' against this SA Objective in the original SA due to the proximity of the Robin's Wood Hill Quarry SSSI. This was amended to a '-/+?' in the Draft Plan SA on the basis that green infrastructure would be provided on site.</p> <p>Robins Wood Hill Quarry is designated a SSSI not for ecological reasons but because of its geological interest. The SSSI is approximately 1km (as the crow flies) from the northern most part of the</p>

³ 'The 2022 GP Compendium of Evidence', Royal College of General Practitioners - https://www.rcgp.org.uk/campaign-home/~/_media/Files/Policy/A-Z-policy/The-2022-GP-Compendium-of-Evidence.ashx

SA Objective	SA Score ²	Savills Score	Comments
			<p>proposed allocation and is a steeply sloping quarry with limited access due to the topography. It is a destination which may be visited by those who have an interest in geology but for the vast majority of residents it highly unlikely to be of any interest. For these reasons the likelihood of any harm to the SSSI as a result of increased visitor numbers arising from the development is negligible.</p> <p>In contrast to other locations proposed for development in the Draft Plan, including the New Community at Sharpness/Newtown, the Land at Whaddon is not constrained by this SA Objective. Given the importance of this objective and that in some instances it can represent a ‘show stopper’ constraint, we have scored the location as ‘+’ as it (a) represents an opportunity to deliver a significant quantum of housing in an unconstrained location; (b) the development as a whole will deliver a net gain in biodiversity; and (c) the onsite provision of Green Instructure which would act as a focus for leisure and recreation activities</p>
SA8: Landscape / Townscape	-?	+?	<p>Development on the Land at Whaddon would ‘change’ the landscape. Whilst any change to the landscape is perceived to be harmful in a Landscape and Visual appraisal, for the plan-making process, it is unhelpful to assess potential development locations in this manner. The scale of development required by the plan must be identified and the Land at Whaddon is relatively unconstrained by the landscape implications of development compared to other locations. Indeed, as the SA acknowledges, the land is not covered by a landscape sensitivity assessment, nor would it effect the integrity or the setting of an AONB.</p> <p>It is also relevant to note that the site has been independently evaluated by inspectors / panels on two previous occasions. The SWRSS Panel concluded that development would “<i>enable the outlook from the viewpoint at Robins Wood (to the north of the land) to be adequately safeguarded without harmful encroachment into the wider countryside</i>”. Whilst the JCS Inspector advised that</p>

SA Objective	SA Score ²	Savills Score	Comments
			<p><i>"in my judgement, landscape is not a bar to development"</i>⁴.</p> <p>In light of this we have scored the site as having a positive impact on this SA Objective. We have however also retained the '?' as there is the opportunity through good quality design and masterplanning to create a new piece of high quality townscape which would beneficially contribute to the achievement of this objective.</p>
SA9: Historic Environment	-	?	<p>There are no heritage assets within the site and the development would not therefore have a direct impact on heritage interests. As the heritage assessment⁵ indicates, there are two assets within the locality, the setting of which could be impacted by the proposed development.</p> <p>At the plan-making stage, where it is necessary to make a judgement based upon a high-level understanding of the location and the policy requirements, it is not possible to determine whether the development would cause harm to the setting of off-site heritage assets and, if so, the magnitude of that harm. Indeed, the tools needed to come to a judgement on this matter, including a detailed assessment of Landscape and Visual impacts, are not available, nor is a development scheme against which harm can be judged.</p> <p>Whilst there are some parts of the wider land area within Policy G2 which could impact upon the setting of these assets, given the extent of the land available it would be possible to design the development in such a way that there is no harm to these assets.</p> <p>For these reasons it is in our view premature to come to a conclusion that the development would have a negative impact upon this SA objective. We have therefore scored the site with a '?' against this objective.</p>
SA10: Air Quality	++/--	+	<p>The assessment of air quality in the SA very crudely assumes that housing development</p>

⁴ Inspector's Interim Report on the JCS dated 26 May 2016, Paragraph 88

⁵ Heritage Impact Assessment for the Strategic Land Availability Assessment (May 2017)

SA Objective	SA Score ²	Savills Score	Comments
			<p>equates to more travel by car which in turn harms air quality. Whilst the 'Accessibility Score' is reported in the SA, we can find no explanation as to how this score has been derived.</p> <p>Notwithstanding the accessibility improvements which would be secured as part of a future development, it is important to note that the site is already well located to provide housing where future residents would have a choice of travel. Unlike other locations proposed for allocation in the Draft Plan, the site is already within close proximity of a wide variety of services and facilities. The likelihood of active and sustainable travel measures being taken up is therefore significantly greater than the more remote proposed allocations.</p> <p>The scale of the housing requirement is fixed and it is incumbent upon the authority to allocate the most sustainable locations to meet that need. The alternative to allocating the Land at Whaddon is to allocate land which is less well placed to deliver housing which is accessible by sustainable modes of travel. It is therefore necessary to score this SA Objective having regard to the potential alternatives. The site has therefore be scored as '+' as in comparison with other potential allocations within Stroud it is extremely well located to provide access by non-car modes.</p>
SA11: Water Quality	0	0	Agree that the development proposals will have no bearing upon this SA Objective.
SA12: Flooding	--	++	<p>It is assumed that this score and the commentary that accompanies it is has been included in error as it is not accurate to say that <i>"a large proportion of this land falls within flood zone 3a and 3b"</i>.</p> <p>Indeed, this conclusion directly contradicts the conclusion of the JCS Inspector which states that <i>"Whereas the functional floodplain runs through the site along Daniels Brook, taking up about 7% of the site according to the developers, the masterplan shows it being used as well integrated green infrastructure. This, I am told, is integral to</i></p>

SA Objective	SA Score ²	Savills Score	Comments
			<p><i>resolving flooding issues downstream in Gloucester and should be considered a benefit.”</i></p> <p>As the Inspector has concluded, far from being a negative impact, the development would assist in resolving downstream flooding issues within Gloucester. In light of this we have scored the site positively.</p>
SA13: Efficient Land Use	--	++	<p>The SA scores the Policy as ‘--’ against this objective on the basis that it is relatively large in size and greenfield. A similar score is given to all of the large development proposals, albeit the ‘Garden Communities’ are suffixed with a ‘?’.</p> <p>We entirely disagree with the approach adopted in the SA and believe it is unhelpful and misleading to score all large developments as being harmful to the efficient use of land. There is a need to allocate land through the Local Plan which will deliver 12,800 dwellings by the end of the plan period. The combination of existing commitments and future allocations assess and include all sustainable and deliverable previously developed sites which are consistent with the plan strategy. Having taken into account this supply there remains a residual need for a significant quantum of housing on greenfield land.</p> <p>Housing development on greenfield land is not in and of itself inefficient use of land. On the contrary, it is using land for an alternative purpose and to meet a clearly identified need for which the authority has a duty to achieve. With this in mind we would argue that the development of the land for housing would deliver far greater sustainability benefits than its retention in agricultural use. Indeed, it would be more productive in all social, economic and environmental respects other than for the production of food.</p> <p>For these reasons, far from being an inefficient, we contend that housing development would enhance the efficient use of land. We have proposed an alternative score accordingly.</p>

SA Objective	SA Score ²	Savills Score	Comments
SA14: Climate Change	0	0	<p>We do not disagree with the conclusion of the SA in relation to this site that the development would have a negligible effect on this objective. Based on the policies in the Draft Plan the development would neither contribute positively or negatively to climate change.</p> <p>We do however note that the SA objectives attribute a '+' to the New Garden Communities on the basis that <i>"the delivery of development in line with Garden City principles is likely to help ensure that a wide range of local jobs are provided within easy commuting distance of homes"</i>.</p> <p>The Land at Whaddon is already located within easy commuting distance of local jobs. Furthermore, the employment locations are established and many jobs already exist. In contrast the New Communities may have land that would be allocated for employment purposes but for the most part they are remote from employment opportunities. They are therefore reliant upon the market delivering new jobs if this objective is to be achieved.</p> <p>For the SA to provide an objective and fair comparison of the available alternatives it must do so on the basis of a reasonable interpretation of the background and context and not deal with the implications of the policies in isolation.</p>
SA15: Waste	0	0	<p>We agree with the SA that the development would have a neutral impact upon this objective.</p>
SA16: Employment	+	+	<p>The assessment of employment impacts in the SA is very simplistic. It is assumed that because the site is unlikely to have less than 10ha of employment land that it would score only a minor positive. In contrast, those larger developments such as the Sharpness New Community have been attributed '++' on the basis that 10ha of employment is proposed.</p> <p>The way that this objective is scored in the SA does not explicitly take into account the contribution of housing development to</p>

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SA Objective	SA Score ²	Savills Score	Comments
			employment from construction or the employment arising from the increase in the local population.
SA17: Economic Growth	++?	++	<p>The SA commentary against this Objective places considerable emphasis on the proximity of education opportunities. Whilst this does eventually have an impact upon economic growth, we would normally expect this assessment to be made under the analysis of services and facilities.</p> <p>Notwithstanding, we agree with the conclusion that a strategic scale development in this location would result in a significant positive contribution to economic growth. We have however removed the question mark as it is not clear how or why this conclusion is uncertain.</p>

Appendix B – Commentary of the JCS Inspector (with emphasis added)

Sites outside the JCS area

79. *On the evidence before me there appear to be no other appropriate sites to form additional, sustainable, urban extensions to Gloucester, which fall entirely within the JCS area and have not otherwise been counted within Gloucester's district capacity. Nonetheless, there seem to be two reasonable omission sites on the southern edge of the Gloucester urban area in Brookthorpe/Whaddon (OM3) and Hardwicke (OM4), the former of which straddles the border with Stroud and the latter of which lies wholly within Stroud.*
80. *These sites are outside the Green Belt and, despite the City Council's desire to expand to the north, accord with the Spatial Strategy. I have driven and walked around these sites and the wider surrounding area. In my judgement they appear to be in sustainable locations, being close to local centres, employment opportunities and schools, and within reasonable distance of the City centre.*
81. *Whilst these sites have undergone initial sustainability appraisal showing no absolute constraints, they have been omitted from further assessment on the basis they are wholly or in part outside the JCS area in Stroud. However, given the shortage of appropriate strategic housing sites around Gloucester, I am not convinced that this is a justified planning reason for rejecting these omission sites.*
82. *Under the duty to co-operate, Stroud District Council has signed a Statement of Cooperation with the JCS authorities to demonstrate its commitment to work with them to ensure OAHNs can be accommodated effectively. Furthermore, its recently adopted Local Plan (November 2015) recognises the possibility of assisting the JCS authorities in meeting their housing needs.*
83. *The Stroud Local Plan has already started to be reviewed and the JCS authorities should engage with Stroud District Council with a view to discussing the potential for Stroud to contribute to Gloucester's requirements by allocating land at Brookthorpe/Whaddon and Hardwicke. Pending completion of this review, a specific Memorandum of Understanding could be entered into, setting out relevant details including scale, location and type of development. If Stroud agree to allocate part or all of these sites for Gloucester's needs in their Local Plan Review, their commitment to allocate and the type and scale of development should be set out in the JCS.*

Brookthorpe/Whaddon

86. *The site at Brookthorpe/Whaddon straddles the border with Stroud and consists of Land South of Grange Road within the Gloucester City area, together with a larger adjacent site within Stroud district. Whilst the Land South of Grange Road is being considered for inclusion in the Gloucester City Plan, I understand that the Stroud site, after being assessed as part of the Stroud Local Plan making process, was rejected as it was not needed to contribute to Stroud's OAHN.*
87. *I am told by the developers that the Grange Road Land has capacity for about 250 dwellings and that the larger site overall could provide a housing led development in the region of 2,750 dwellings, together with a new primary school and local centre. Apparently the Regional Spatial Strategy Panel Report indicated that this area was suitable for about 1,500 dwellings, and this number is reflected in the Broad Locations Report for Broad Location G6, which covers the site. The developers have undertaken a suite of baseline studies to inform development design, and I understand that the site could move forward to planning application quickly.*
88. *The site is largely agricultural and is surrounded by built development to the north and west. It is bounded by the M5 Motorway to the south east and the railway line to the west. The Stroud Road (A4173) runs close to and partly adjacent to its eastern boundary. The Broad Locations Report indicates that this area has varied landscape sensitivity although none of it seems to be highly sensitive. The report suggests that land to the north east closest to Robins Wood Hill and to the south west at Nass Farm is of medium sensitivity, with that to the far west being medium to low. In my judgement, landscape is not a bar to development.*
89. *Whereas the functional floodplain runs through the site along Daniels Brook, taking up about 7% of the site according to the developers, the masterplan shows it being used as well integrated green infrastructure. This, I am told, is integral to resolving flooding issues downstream in Gloucester and should be considered a benefit. The Broad Locations report also refers to the site's potential for flood betterment for downstream properties. On this basis, I accept this could be a benefit.*
90. *The Broad Locations Report suggests that there is poor transport connectivity to Gloucester City. Nonetheless, it points to Local Transport Plan proposals to expand the park and ride facility at nearby Waterwells, and the possibility of an additional rail station at nearby Huntsgrove. However, I understand that the Regional Spatial Strategy Panel did not find these facilities to be essential to allow development to proceed.*
91. *Stagecoach has indicated that a public transport service could be provided to the north of the site although large scale development to the south would put pressure on the existing local*

highway. Therefore, they say that some kind of north-south bus spine would be needed through the site, which should feed northwards into a bus advantage corridor to allow swift bus movements.

92. *The developers suggest that such a major development would be more than capable of improving access to sustainable transport and also emphasise the potential for a new rail station on site, which is shown in their masterplan. Whilst I have not examined any viability evidence for this, it seems to me that, in principle, such a large scale development should be capable of resolving these transport issues.*
93. *Overall, in my judgement, there are no insurmountable constraints to developing the Brookthorpe/Waddon site and it would make an appropriate allocation to help meet the housing requirements of Gloucester and the JCS area.*