

LAND SOUTH OF HARDWICKE POSITION STATEMENT

May 2021

PROPOSAL

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
V1	Position Statement	EF	DB	EF	20/05/21

Approval for issue

Emma Fortune

20 May 2021

The purpose of RPS' services will be to [insert who the client is and what services RPS will be providing]. Information provided by the sender, RPS Group Plc, any of its subsidiaries, or a related entity (collectively 'RPS') may only be relied upon in the context of RPS' scope of works. [Client] will necessarily inform itself and make independent decisions, based on its own business needs and on key aspects in relation to the project.

No part of this proposal may be copied or reproduced, by any means, without the prior written consent of RPS.

Prepared by:

RPS

Emma Fortune BSc (Hons), MSc, MRTPI
Associate Director

2 Callaghan Square
Cardiff
CF10 5AZ

T +44 2920 668 662
E emma.fortune@rpsgroup.com

Prepared for:

Redrow Homes

Contents

Introduction	1
Site Description and Ownership	1
Development Proposals	2
Technical Assessments	2

Introduction

- 1.1 The purpose of this Position Statement is to assist Stroud District Council with their Regulation 19 (Pre-Submission Draft Local Plan) Consultation to outline the technical assessments and studies that have been completed to date in respect of the Land to the South of Hardwicke which is included as an allocation in the Draft Local Plan. The suite of technical assessment undertaken to date have been used to inform the development framework for the site as well as to demonstrate that proposed allocation is available, suitable, deliverable and viable.
- 1.2 The site was the subject of a formal Screening and Scoping exercise under the Town and Country Planning (Environmental Impact Assessment(EIA)) Regulations 2017 in September 2020 (ref: 2020/0544/EIAS) which is now being used by Redrow Homes and their consultant team to work up a planning application and associated Environmental Statement (ES) for the development of the site for approximately 1350 residential dwellings together with a primary school, local centre, community uses, highway improvements and associated ancillary uses including open space, green infrastructure and drainage attenuation.
- 1.3 It is Redrow Homes intention to submit a planning application for the site which will be timed to run alongside the Stroud Local Plan Reviews examination (Q3/Q4 2021). As it stands, many of the technical reports and information held in respect of the site are therefore being updated. To assist Stroud District Council during the Pre-Submission Draft Local Plan consultation, a summary of the technical information that has been prepared to date and the key findings are set out below.

Site Description and Ownership

- 1.4 Redrow Homes Ltd, with the support of the Hardwicke Court Estate and Gloucestershire County Council, are promoting the Land to the South of Hardwicke for residential development. Redrow Homes is leading the promotion of the site. Redrow owns the freehold of part of the site and controls the balance via option agreement.
- 1.5 Land to the South of Hardwicke equates to approximately 61ha (151acres) and is located adjacent to the suburb of Quedgeley at the southern edge of the Gloucester conurbation; adjacent to the 'A38' Bristol Road. The site is essentially divided into three areas, the majority of which is used for agricultural purposes. Access to the site is currently achieved via A38, Green Lane, Sticky Lane, Pound Lane and Church Lane.
- 1.6 The site's western boundary is formed by the Gloucester and Sharpness Canal, which provides both a physical and visual barrier to the west. The eastern boundary is formed by the B4008, A38 and the large buildings of the Quedgeley Trading Estate West. To the south lies the open countryside.
- 1.7 The site lies outside of the statutory Green Belt, Area of Outstanding Natural Beauty, Special Landscape Area and is located close to local centres, employment opportunities, schools, healthcare and the range of facilities and services offered by Gloucester City centre.
- 1.8 The site itself is not located within a conservation area, nor does the site contain any designated built heritage assets. In terms of non-designated assets, these are limited to the course of a Roman road, some relict ridge and furrow and, bounding the site, the Gloucester & Sharpness canal. There are also a number of listed buildings in the vicinity of the site including The Church of St Nicholas, Pound Lane (Grade I) and its associated Grade II Listed monuments which are located within the churchyard, Old Vicarage, Pound Lane (Grade II), Church House, Pound Lane (Grade II), Church House Farmhouse, Church Lane (Grade II), Old Thatch, Church Lane (Grade II), Old Hall, Church Lane (Grade II), Tudor Cottage, Green Lane (Grade II), The Cottages, Sticky Lane (Grade II) and the Milestone located on Bristol Road (Grade II).
- 1.9 The majority of the site is located within Flood Zone 1 although areas of the site associated with Shorn Brook, which runs through the middle of the site from Church Lane, and an un-named water course at Pound Lane are located within Flood Zones 2, 3a and 3b.
- 1.10 Development at Hardwicke would provide further opportunity to consolidate and enhance the development in the area including the ongoing development at Hunts Grove on the eastern side of the A38. The site itself would deliver a range of services and facilities to deliver a sustainable

community including a primary school, local centre, community uses, improved allotment provision, open space and improved walking, cycling and public transport links.

- 1.11 It is anticipated that from a start of 50 homes being completed in the first year the whole site could be completed in 10 years on the basis of delivering circa 100 homes each year.

Development Proposals

- 1.12 The appended illustrative land use plan (ref: ILUP-01 P1) outlines how the Land South of Hardwicke could be developed in a sustainable manner and as a positive response to the site constraints, opportunities and characteristics of the site.
- 1.13 The illustrative land use plan demonstrates how the site could provide for approximately 1350 dwellings at an average density of between 35 to 40 dwellings per hectare. This density range is considered appropriate and in keeping with the character of neighbouring developments. The development of the site also includes a primary school, local centre, community uses, green infrastructure, open space, strategic landscaping and enhanced vehicular, pedestrian and cycling routes.
- 1.14 It is proposed that the primary access to development on Land to the South of Hardwicke would be from the A38 by way of a new signal controlled junction that would operate in conjunction with the Hunts Grove access and would be compatible with the County Council's Cross Keys roundabout improvement scheme completed in October 2019.
- 1.15 A secondary access via a roundabout on the B4008 Bristol Road positioned at the 'top' of the A38 Northbound Off-Slip is also proposed. This slip road is part of a form of grade separated junction that provides connections between the B4008 and the A38. The proposed roundabout would act as an effective speed control feature and would be compatible with the consented signalised junction onto the A38/B4008 to serve the Hunts Grove development (the Hunts Grove access), which includes the conversion of the existing overbridge to two-way traffic. In addition to the proposed accesses from the B4008 Bristol Road and the A38, it is possible other accesses to roads surrounding the site could be formed, which, in combination with a network of new roads crossing the site would relieve sections of Green Lane, Church Lane and Pound Lane by way of improved connectivity providing alternative routes for local traffic to gain access to the wider highway network.
- 1.16 The illustrative land use plan has been clearly informed by the site's constraints and opportunities which relate to the retention of existing landscape features, flood zones, the establishment of green links, movement desire lines and built heritage assets. In particular, development has been directed away from the flood zones, listed buildings and the existing hedgerows and trees are retained where possible. In turn, this has formed the basis of the structure of the scheme and open space provision. A green corridor has also been formed to accommodate a high pressure gas pipeline that crosses the site, which is proposed to be diverted and upgraded to reduce the associated constraints, as well as the stream corridor and the location of great crested newts and bat corridors. Transportation routes have also been designed to try and relieve pressure on the existing lanes within the site and aid permeability. Additional pedestrian and cycling connections into surrounding areas are also proposed to aid connectivity into Hardwicke.

Technical Assessments

Highways

- 1.17 The highways proposals seek to ensure that transport infrastructure in and around the site is developed in a way that will not only accommodate traffic demands but will also ensure that a good quality environment is established to encourage walking, cycling and public transport use in line with the provisions of the National Planning Policy Framework (NPPF). An aim of the transport planning of the site is to also try and relieve pressure on the existing lanes within the site and aid permeability for all modes of transport including bus public transport.
- 1.18 The part of the site bounded by Green Lane to the north, the B4008 Bristol Road to the east and Sticky Lane to the south and west, was the subject of a planning application in 2016 by Redrow Homes for a residential development. The planning application was withdrawn, whilst no technical objections were made, and the focus turned to promoting the larger site. In respect of Transport, Gloucestershire County Council (GCC) raised no highway objection subject to conditions (GCC

Highway Recommendation dated 4 February 2019) and Highways England provided a planning response recommending that conditions be attached to any planning permission that may be granted (Highways England Planning Response dated 28 March 2018). Highways England recommended three planning conditions, which would limit the number of private dwellings to 122 and tie the proposals to the Cross Keys roundabout and M5 Junction 12 schemes. The relevant schemes were completed at the Cross Keys roundabout in 2019 and M5 Junction 12 in 2020.

- 1.19 A Transport Assessment and Travel Plan is currently being prepared to assess the likely transport impacts of the proposals and identify the measures required to improve accessibility and safety for all modes of transport, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed to deal with the anticipated transport impacts of the proposed development in accordance with the NPPF and Planning Practice Guidance.
- 1.20 The scale, scope and level of detail required of the Transport Assessment and associated Travel Plan has been agreed with the highway authorities including both Gloucestershire County Council, in its capacity as local highway authority, and Highways England, which is responsible for operating, maintaining and improving the strategic road network in England, including the M5 motorway. The scoping exercise was informed by the consultations already undertaken in connection with the Local Plan Review and associated evidence base, including the Stroud Sustainable Transport Strategy, and traffic modelling being undertaken on behalf of Stroud District Council to establish the impact of the proposed local plan allocations. It also drew upon local knowledge gained and principles established as part of assessment work undertaken in connection with previous planning applications for development in the area.
- 1.21 The site is however located where a sustainable pattern of development can be achieved by way of access to local facilities including education, leisure, health, retail and employment on foot, by bicycle or by bus. The site is adjacent to the A38, which is identified as a 'Main Movement Corridor' in the Stroud Sustainable Transport Strategy where integrated packages of initiatives can be delivered, which can showcase multimodal use with a focus on sustainable travel modes. Improvements to the A38 will provide additional benefits to the economy and new developments off the road including development on Land South of Hardwicke.

Ecology

- 1.22 Habitat surveys of the site have been undertaken since 2014 and include:
 - **2014 / 2015 Surveys** - Ecological appraisal, bat activity transects, great crested newt (GCN) Environmental DNA (eDNA) and reptile presence / absence.
 - **2017 Assessments** - Habitat Regulations Assessment
 - **2018 Surveys** – Updated the Ecological Appraisal, Bat activity transects and remote recording, GCN presence / absence using traditional survey methods, water vole presence / absence and breeding birds.
 - **2020 Surveys** – Updated Ecological Appraisal, badger survey, bat activity transects and remote recording, assessment of trees for bat roost potential and aerial inspections, water vole presence / absence survey.
 - **2021 Surveys** - Fish baseline, macroinvertebrate and bat emergence surveys.
- 1.23 All the surveys have been or will be completed during the appropriate season and following the relevant published best practice survey guidance. The surveys required to inform this proposed application were agreed in advance in June 2016 with Stroud District Council ecologists through the planning advice service. The EIA screening and scoping exercise undertaken in 2020 further confirmed the ecological assessments required in support of the development proposals.
- 1.24 To date, the reports confirm that the site largely comprises intensively farmed arable fields which are of very low ecological value.
- 1.25 Moderately species-rich semi-improved neutral grassland extends along the northwestern boundary parallel with the Gloucester and Sharpness Canal. The grassland is not managed and is reverting to rank condition. There are two further fields of semi-improved grassland, but these are species-poor with a low diversity of herbs. An area of more rank grassland has developed where

bramble scrub and ruderals have been periodically cleared south of Green Lane. Some of the arable field corners are also overgrown with rank grassland and scattered immature scrub.

- 1.26 None of the grassland areas is of high ecological value and they do not meet the qualifying criteria to be classified as 'Habitats of Principal Importance for Conservation in England' under Section 41 of the Natural Environment and Rural Communities (NERC) act 2006.
- 1.27 The fields are divided by a network of hedgerows. These are species-poor and managed, typically having a dense structure down to the ground level although a few are more open. Many of the hedgerows have mature trees, mainly ash and pedunculate oak. The hedge base flora is species-poor comprising rank grassland and ruderals in the narrow uncultivated field margins.
- 1.28 The hedgerows are not species rich and are unlikely to qualify as 'important' under the wildlife criteria defined in the Hedgerows Regulations 1997. All of the hedgerows will qualify as 'Habitats of Principal Importance...' under the NERC act 2006.
- 1.29 There is a small broadleaved woodland copse on-line with one of the hedgerows. The canopy largely comprises mature pedunculate oak and turkey oak with a sparse scrub understorey of hawthorn and elm and a sparse ground flora. The woodland, while established with mature trees lacks the structural and species diversity characteristic of higher value semi-natural woodlands of this type. The woodland potentially qualifies as the 'Lowland mixed deciduous woodland' priority habitat and would be a 'Habitat of Principal Importance...' under the NERC act 2006.
- 1.30 A watercourse, Shorn Brook flows westwards through the site. The brook flows along the southern edge of Sticky Lane where it is bounded by the narrow road verge, adjacent residential properties and arable fields. The brook then meanders between arable fields and semi-improved grassland where it is partly over-shaded by dense scrub, bramble thicket and trees on the banks. The brook diverts south along a realigned route between residential properties (off-site) and an arable field, connecting to a culvert beneath Church Lane. The realigned channel supports aquatic emergent vegetation while the steep engineered banks are a mix of rank grassland and tall herb vegetation. The channel west of Church Lane is similar in character to the realigned section. Here the channel and passes through semi-improved grassland following a mature tree line (off-site) to a weir where it flows into the Gloucester and Sharpness canal.
- 1.31 There are 11 small ponds within the site. All except one of the ponds are located within woodland or dense scrub and are heavily shaded with no aquatic vegetation. Most of the ponds were dry in summer 2018 and again in summer 2020. With the exception of one woodland pond which supports a small population of great crested newts, the ponds do not qualify as Habitats of Principal Importance under the NERC act 2006.
- 1.32 The illustrative land use plan is designed around the green infrastructure with key wildlife corridors providing connectivity through the site east to west, north to south, and along the adjacent Gloucester and Sharpness Canal.
- 1.33 Retained features will be sympathetically incorporated into the green infrastructure alongside new habitats which will be created on agricultural land of low ecological value thus maximising the biodiversity value of on-site green infrastructure. Where appropriate biodiversity value will also be built into the design of drainage systems and public open space to increase opportunities for wildlife across the developed site.
- 1.34 The highest value semi-improved grassland and scrub along the Gloucester and Sharpness canal will be retained. Semi-improved grassland will also be retained alongside the canal and along Shorn Brook to create a continuous east-west green corridor through the site. The woodland copse and many of the mature trees along with a proportion of the hedgerows and grassy field margins will be retained and incorporated into the green infrastructure.
- 1.35 Taking into account the overall low ecological value of the integrated green infrastructure incorporating retained features of highest value, provides opportunities for mitigation and potential biodiversity enhancement.
- 1.36 A Biodiversity Net Gain (BNG) assessment will be carried out for the site and all opportunities for ecological enhancements within the site will be incorporated where possible.

Landscape and Visual

- 1.37 Hardwicke is visually well contained located adjacent to the developments of Hunts Grove and Sellars Farm, both of which have been found to constitute appropriate urban extensions to Gloucester. A high-level Landscape and Visual Appraisal of the site was undertaken in 2014, which has helped to inform the emerging proposals for the site. This has been followed up by further site visits to collect up to date survey information as the proposals have evolved. The EIA Screening and Scoping exercise that was undertaken in 2020 agreed the viewpoint locations that will be used within the LVIA and associated ES Chapter that will support the development proposals for the site.
- 1.38 From the Landscape and Visual Appraisal that has already been undertaken, it has been established that from a landscape perspective, it will be possible to introduce development onto the site without any adverse character effects taking place within the wider area. This is predominantly due to existing vegetation and the fact that the development character will mimic that of the surrounding area.
- 1.39 With regard to the visual appraisal, due to the topography of the site, existing built form and vegetation, views of the site are contained to the site itself and the immediate vicinity. The development, from a distanced perspective, will integrate into the wider built panorama and constitute a small extension to the current urban form.
- 1.40 The principles contained within the illustrative masterplan are considered to be appropriate in terms of its setting and the landscape character of the site. The masterplan has green corridors and large area of green space at the interface with the land to the South and West.

Flooding and Hydrology

- 1.41 A Desk Top Assessment of the flood risk in the area based on Environment Agency and Strategic Flood Risk Assessment data has been undertaken.
- 1.42 The majority of the site is located within Flood Zone 1. Areas of the site associated with Shorn Brook, which runs through the middle of the site from Church Lane, and an un-named water course at Pound Lane are located within Flood Zones 2, 3a and 3b. The submitted constraints and opportunities plan illustrates the extent of the flood zones.
- 1.43 The flood risk from all sources to the site and the surrounding area has been investigated and it has been demonstrated that areas within and adjacent to the site that are within flood zone 2, 3a and 3b are not at risk of flooding. The illustrative land use plan directs built development away from these areas. The plan also assumes that attenuation basins will be located at the lowest points of the site. The exact size and location of the basins will be subject to detailed analysis later however, it is considered that surface water flooding risk as a result of the proposed development can be adequately managed on site within attenuation ponds.
- 1.44 The drainage review undertaken to date demonstrates that the development accords with National and Regional Policy requirements and satisfies Environment Agency criteria. The site can therefore be safely developed without flood risk and without increasing flood risk elsewhere.
- 1.45 The detail of the development will be assessed in the EIA through the production of a Flood Risk Assessment which will be supported by a drainage strategy.

Archaeology

- 1.46 Archaeological baseline studies are currently underway across the whole site including an archaeological desk-based assessment (DBA), geophysical survey and archaeological evaluation trial trenching. Geophysical investigations have concluded across the wider site and trial trenching has already taken place within the north-eastern area of the site on land which was the subject of a planning application in 2016 by Redrow Homes for a residential development. Based on the findings of the investigative surveys, the LPA advisor confirmed that no further fieldwork was required in this specific area.
- 1.47 While it is not possible to extrapolate this potential across the whole of the wider site, the results of the investigations to date indicate that there may be a limited archaeological potential across the rest of the wider site. It is therefore concluded that there is no indication of any absolute constraint to development arising from the presence of archaeological remains within the wider site.

Cultural Heritage

- 1.48 A Cultural Heritage baseline assessment is currently being prepared and will support the planning application and associated Environmental Impact Assessment for the site.
- 1.49 The site itself is not located within a conservation area, nor does the site contain any designated or non-designated built heritage assets. In terms of non-designated archaeological assets, these are limited to the course of a Roman road, some relict ridge and furrow and, bounding the site, the Gloucester & Sharpness canal. There are a number of listed buildings in the vicinity of the site including The Church of St Nicholas, Pound Lane (Grade I) and its associated Grade II Listed monuments which are located within the churchyard, Old Vicarage, Pound Lane (Grade II), Church House, Pound Lane (Grade II), Church House Farmhouse, Church Lane (Grade II), Old Thatch, Church Lane (Grade II), Old Hall, Church Lane (Grade II), Tudor Cottage, Green Lane (Grade II), The Cottages, Sticky Lane (Grade II) and the Milestone located on Bristol Road (Grade II). The location of the Listed buildings are shown on the Constraints and Opportunities Plan.
- 1.50 The illustrative masterplan seeks to ensure that the character and setting of each of the built heritage assets are protected, mainly secured through the use of appropriate undeveloped buffers and screening. Listed buildings which lie further afield would also be unaffected due to distance from the proposed site and intervening natural screening. Green corridors are to be created to protect the rural setting of the Gloucester & Sharpness Canal, Green Lane and Church Lane and the historic settlement clusters on Sticky Lane and at Hardwick. In order to further protect settings, localised orchard planting of historic Gloucestershire varieties of apples and perry pears is proposed in order to further screen the new built development. Because of the designed-in mitigation, it is considered that this site can be developed whilst protecting (and in some cases making more apparent) the local historic environment.

Agricultural Land

- 1.51 An Agricultural Land Classification survey of the site was undertaken in April/May 2021. The results of the survey confirm that 97% of the site is classified as Grade 3b (moderate quality) with only 3% of the site being classified as Grade 3a (best and most versatile). The impact of the development proposals on the site from an agricultural land use point of view will be assessment with the ES.

Noise

- 1.52 The site is located in a semi-rural location in which some residential dwellings are located and as such will be sensitive to varying degrees of noise and/or vibration from the construction and operation of the proposed development. The residential units once occupied are however not considered to be a significant source of noise, although additional road traffic resulting from the proposals have the potential to increase noise levels.
- 1.53 An Environmental Noise Assessment will be undertaken to inform the development proposals and assessed within the ES based on latest industry methodologies.

Utilities

- 1.54 Extensive discussions have taken place with utilities providers since 2019. The routes of all known pipes, sewers and overhead lines (including relevant diversions) are identified on the constraints and opportunities plan and are respected in the masterplan design for the site.
- 1.55 A feasibility study (for diversion/upgrades) in respect of the high-pressure gas pipeline which crosses the site is currently underway in association with Wales & West Utilities.

Air Quality

- 1.56 It has been identified that the proposed application site is not located within or near an Air Quality Management Area.
- 1.57 An Air Quality Assessment is being undertaken as part of the ES and will assess the existing air quality conditions at the site. An assessment of the impacts of construction and changes to traffic flows associated with construction and operation of the development will be undertaken.
- 1.58 The additional heating requirements of the new buildings have the potential to increase carbon dioxide (CO₂) emissions, which contribute to climate change. The potential for renewable energy sources will be investigated to address this.

Climate Change

1.59 It is recognised that Stroud District Council are committed to becoming carbon neutral by 2030. An energy statement as well as an assessment of climate change and greenhouse gas emissions (GHGs) is being undertaken as part of the ES in support of the development for the site.

Waste Management

1.60 The planning application for the site will also be supported by a waste management plan.

Appendix 1: Illustrative Land Use Plan