



# Planning for our future

## Draft Local Plan - Additional housing options consultation

### 1. Introduction

The following survey relates to the *Stroud District Local Plan Review: Additional housing options October 2020* which can be viewed at <https://www.stroud.gov.uk/localplanreview> (<https://www.stroud.gov.uk/localplanreview>)

In August 2020, the Government published a consultation document which proposed changes to the way the Government calculates minimum housing requirement for each local authority area in the country. This revised standard method has proposed increasing the requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 homes per annum, to 786 homes per annum. If this new revised method is confirmed, a revised Draft Local Plan may have to identify further land within the District for housing.

The Council is therefore launching a narrow focused eight-week public consultation from 21 October 2020 to 16 December 2020 on additional housing options and sites, which could be brought into the emerging Local Plan, if required. We would also like your views on whether and how a reserve housing supply should be identified, in case any of the Local Plan's site allocations were to fall short on delivering the numbers of homes expected.

#### Making comments

Whilst we encourage responses to this consultation, please do not repeat comments that you may have made previously on other policies or sites which formed part of the Draft Local Plan, but which do not form part of this focused consultation. These previous comments will be taken into consideration and a report of consultation will accompany the final Draft Local Plan when it is considered in 2021.

You do not need to fill in every question. Once finished, please go to the last page to submit your response. There is an opportunity to print your response at the end of the survey so that you can

keep a copy for yourself. If you would like to save your response and return to complete it later then please press save and continue later at the bottom of the page.

The consultation will close on Wednesday 16 December 2020

#### Data Protection

Personal data is processed in accordance with the Council's Privacy Notice. Please see our Privacy Notice web page (<http://www.stroud.gov.uk/council-and-democracy/about-the-council/access-to-information/privacy-and-cookie-policy/privacy-notice>) Sections 1 to 10 and our policies (<http://www.stroud.gov.uk/council-and-democracy/about-the-council/access-to-information/privacy-and-cookie-policy/privacy-notice/18-planning-and-buildings-privacy-notices-and-retention-policies>) for details specifically affecting Planning and Building Control.

## 2. Your details

Name \*

Your company or organisation

Your email address \*

Client's name (if applicable)

Client's company or organisation (if applicable)

Which area/cluster of parishes do you identify yourself with (i.e. live, work, visit)? \*

- Berkeley (Parishes of Berkeley, Ham & Stone, Alkington, Hamfallow, Hinton, Slimbridge)
- Cam & Dursley (Parishes of Dursley, Cam, Coaley, Stinchcombe, Uley, Nympsfield, Owlpen)
- Cotswold (Parishes of Painswick, Bisley-with-Lypiatt, Miserden, Cranham. Pitchcombe)
- Gloucester Fringe (Parishes of Hardwicke, Haresfield, Harescombe, Brookthorpe-with-Whaddon, Upton St Leonards)
- Severn Vale (Parishes of Arlingham, Fretherne-with-Saul, Frampton on Severn, Whitminster, Moreton Valence, Longney. Elmore)
- Stonehouse (Parishes of Stonehouse, Standish, Eastington, Frocester, Leonard Stanley, Kings Stanley)

- Stroud Valleys (Parishes of Stroud, Whiteshill & Ruscombe, Randwick, Cainscross, Rodborough, Brimscombe & Thrupp, Chalford, Woodchester, Minchinhampton, Horsley, Nailsworth)
- Wotton (Parishes of Wotton-under-Edge, North Nibley, Kingswood, Alderley, Hillesley & Tresham)
- Outside the District

### 3. Spatial Options: additional housing land

**Qu.1a Would you support or object to Option A - "Intensify", if additional housing land is required?**

- Support
- Object

Please explain your answer

See response to Question 1e below

**Qu.1b Would you support or object to Option B - "Towns and villages", if additional housing land is required?**

- Support
- Object

Please explain your answer

See response to Question 1e below

**Qu.1c Would you support or object to Option C - "Additional growth point", if additional housing land is required?**

- Support
- Object

Please explain your answer

See response to Question 1e below

**Qu.1d Would you support or object to Option D - "Wider dispersal", if additional housing land is required?**

- Support  
 Object

Please explain your answer

A wider dispersal option would not be consistent with the objectives of national policy as set out in the NPPF

**Qu.1e Would you support or object to a hybrid or combination of options?**

- Support Please answer Qu. 2 to explain which hybrid/combination of options you would support)  
 Object

Please explain your answer

Pegasus on behalf of Robert Hitchins Limited welcome the consultation on the Additional Housing Options.

A hybrid option is supported for a number of reasons:

- The Government's objective is to significantly boost the supply of homes, in order to achieve this it is important that a sufficient amount and variety of land can come forward where it is needed, that meets the needs of groups with specific housing requirements and that land with permission is developed without delay.
- The most effective way of achieving delivery is to have a range and choice of sites.
- The Plan will be able to meet the size, type and tenure of housing needed for different groups in the community.
- It is noted that the Council have had to prepare a Delivery Action Plan (August 2019) to respond to the Housing Delivery Test (HDT) for Stroud published in February 2019 (this reflects the HDT measurement of 94% housing completions for the three year period 01 April 2015 to 31<sup>st</sup> March 2018. The Action Plan was required to reduce the risk of future under delivery. The under delivery reflected the lower delivery rates in the two year period 2015-2017 are attributable to delays to programmed delivery at major development sites at Littlecombe, Dursley and Hunts Grove, Hardwicke, due to infrastructure requirements, and detailed planning permission outstanding at Local Plan allocation sites at SA2: Land west of Stonehouse and SA3: NE Cam. Land West of Stonehouse {S.14/0810/OUT} was a Local Plan allocation promoted by RHL through the LP, a planning application was submitted and validated on 4<sup>th</sup> April 2014 and a decision was issued on 14<sup>th</sup> April 2016). It is noted that the Action Plan in Table 2 for the three years 2016 -2019 shows a marked increase above that required for the new three year period. Whilst the housing land supply measured against the adopted district housing requirement is well in excess of 5 years ( 8.95yrs Stroud Housing Land Supply October 2020) as the Local Plan is now more than 5yrs old, (i.e. since it was adopted in November 2015) the district housing land supply is measured against the District's housing need assessed using the current standard method. Based on the Local Housing Need Standard Method there is a 6.56 years supply. However, due to the COVID 19 pandemic the Council have not been able to undertake a full and comprehensive reassessment of the housing land supply, consequently the report provides an indication of how the land supply position may be changing in particular in relation to the standard method for assessing local housing need.

- As the revised standard method increases the housing requirement, this underlines the importance of including a range and choice of sites in the Plan to ensure delivery is met.
- It is noted that the SA accompanying the consultation on Additional Housing Sites Options recommends that the Council continues with a hybrid approach to the strategy.

**Qu.1f Can you suggest another strategy / spatial option for the identification of additional housing land?**

- Yes  
 No

Please describe it

**Qu. 2 If you answered yes to Q1e above, please select which of the spatial options (A-D) you would like to see combined in a hybrid strategy?**

- Option A - Intensify  
 Option B – Towns and villages  
 Option C – Additional growth point  
 Option D – Wider dispersal

Please explain why

A hybrid strategy enabling a wide choice and range of size of sites to meet housing needs can be met by a combination of Option A, B and C.

In our representations to the Draft Plan in January 2020, **Land at Grove End Farm, Whitminster has been promoted to the Council as a sustainable alternative location for development as opposed to land at Sharpness or Wisloe Green.**

The Additional Sites consultation includes land at Grove End Farm as a potential growth point, this is supported, but as outlined in our previous representations the site is a sustainable alternative to Sharpness or Wisloe Green.

As demonstrated in our submission in January 2020, it is considered that land at Grove End Farm, Whitminster, which is at the confluence of the A38/M5 and A419 corridors, well related to Stroud/Stonehouse, Cam/Dursley and also Gloucester, provides the opportunity to achieve a mixed use development in a highly sustainable location (being well connected to public transport).

**This is covered in more detail below in response to Section 6**

## 4. Spatial Options: a reserve housing supply

**Qu.3 Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?**

- Yes
- No - you should start an immediate review of the Plan instead
- No - other option (Please specify)

Whilst the identification of reserve sites was recommended by the Local Plans Expert Group in 2016, this approach was not included in the revised NPPF in 2019. Consequently, the concept of reserve sites is not supported. The approach outlined in the NPPF is to ensure that provision is made to support the Government's objective to significantly boost the supply of homes; in order to do this it is important that a sufficient amount and variety of land can come forward where it is needed.

In accordance with the NPPF, Plans need to be prepared positively, in a way that is aspirational but deliverable. Para 23 states that *"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area." My emphasis.*

The tests of soundness require plans to be positively prepared i.e. *"providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs."*

The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

*"The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates".* Paragraph: 010 Reference ID: 2a-010-20190220

The housing requirement is often referred to as "at least" or a minimum. It is considered that more sites should be allocated than the minimum.

By adopting this approach and facilitating sites to come forward this would accord with the NPPF para 11, para 36 and para 60 and the PPG, in particular in para 67 of the NPPF which states that the planning authority should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

Performance is monitored through the Housing Delivery Test and mechanisms are to be put in place to address any performance which fails to meet the requirements. The HDT is also one of a number of factors that are considered when determining the need to review the plan, along with whether the authority can demonstrate a 5 year supply of deliverable sites for housing and whether issues have arisen that may impact on the deliverability of key site allocations.

Generally Local Plans are to be reviewed at least once every five years and the review process is a method to ensure that a plan and the policies within remains effective. There will be occasions as referred to above and also where there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies earlier than the statutory minimum of 5 years, for example, where new cross-boundary matters arise. This is to ensure that all housing need is planned for as quickly as reasonably possible.

**Qu.4b Would you support or object to Option B - "Towns and villages", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site).**

- Support  
 Object

Please explain your answer

Please see answer to Question 3 above. Reserve sites are not supported, instead more than sufficient sites should be allocated in the Plan in accordance with the NPPF paragraph 67 and to ensure a 5 year housing land supply etc. and that there is a significant boost to the supply of homes in the district in accordance with the NPPF.

**Qu.4c Would you support or object to Option C - "Additional growth point", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site).**

- Support  
 Object

Please explain your answer

Please see answer to question 3 above. Reserve sites are not supported, instead more than sufficient sites should be allocated in the Plan in accordance with the NPPF paragraph 67 and to ensure a 5 year housing land supply etc. and that there is a significant boost to the supply of homes in the district in accordance with the NPPF.

**Qu.4d Would you support or object to Option D - "Wider dispersal", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site)**

- Support  
 Object

Please explain your answer

Option D "Wider dispersal" is not supported as an option as it is not consistent with the NPPF, it would not support a sustainable strategy. Dispersal could potentially affect the existing character of high number of rural settlements and lead to further commuting etc.

**Qu.4e Would you support or object to a hybrid or combination of options in order to identify an additional reserve site (or sites)?**

- Support (Please answer Qu. 5 to explain which hybrid/combination of options you would support)  
 Object

Please explain your answer

See comments above in response to Question 3. As an objection is made to the concept of reserve sites, it is considered that the plan should include sites to provide sufficient flexibility to enable housing needs to be met.

**Qu.4f Can you suggest another strategy / spatial option for the identification of a reserve site/sites?**

- Yes  
 No

Please describe it

See comments above in response to Question 3. As an objection is made to the concept of reserve sites, it is considered that the plan should include sites to provide sufficient flexibility to enable housing needs to be met.

**Qu. 5 If you answered yes to Q4e above, please explain which of the spatial options (B-D) you would like to see combined in a hybrid strategy, and why?**

- Option A - Intensify  
 Option B – Towns and villages  
 Option C – Additional growth point  
 Option D – Wider dispersal  
 No, I would support another option (Please specify below)

**NOTE: if a site in the Local Plan does not come forward for development as expected, the a reserve site may be required. However, the "trigger" for allowing a reserve site or sites to receive planning permission needs to be clearly set out in the Plan, to avoid doubt or uncertainty. There could be a variety of triggers / reasons for bringing a reserve site into play.**



**Qu.6 What should trigger a reserve site (or sites) coming forward?**

- A delay in an allocated Local Plan site receiving planning permission?
- Failure to deliver housing at the build rates set out in the Local Plan?
- Another trigger (please specify below)

Please explain your reasons

The principle of reserve site(s) is not supported. If such an approach were included it raises many questions in terms of what triggers a reserve site coming forward and if that site is regarded as a suitable site why should it be "restrained or delayed in any way" when there is a clear objective to significantly boost housing supply.

In order to overcome a possible situation where there is a delay to an allocated site receiving planning permission or housing delivery not coming forward as envisaged, having a wide range of sites included in the plan in excess of the minimum housing requirement will provide some flexibility.

## 5. Additional housing options - Potential sites

**Qu.7a Do you support or object to the development of a site identified at: (BER016) Hook Street Farm, Lynch Road, Berkeley?**

- Support
- Object

Please explain

It is noted in the SA that this site is recorded as containing areas of land within flood zones 3a or 3b and therefore a significant negative effect in relation to SA objective 12: flooding ( red double negative).

There is no Flood Risk Assessment of this site or for BER017 as the Council's evidence base relates to the SFRA (Draft 2019) which only covers site PS33 in the Draft Plan and identifies the flood risk.

The Environment Agency mapping for flood risk shows the area as Flood Zone 3, with an area shown as flood defences running in a north /south direction to the west of Berkeley, running through the site. Therefore an objection is made to the site.

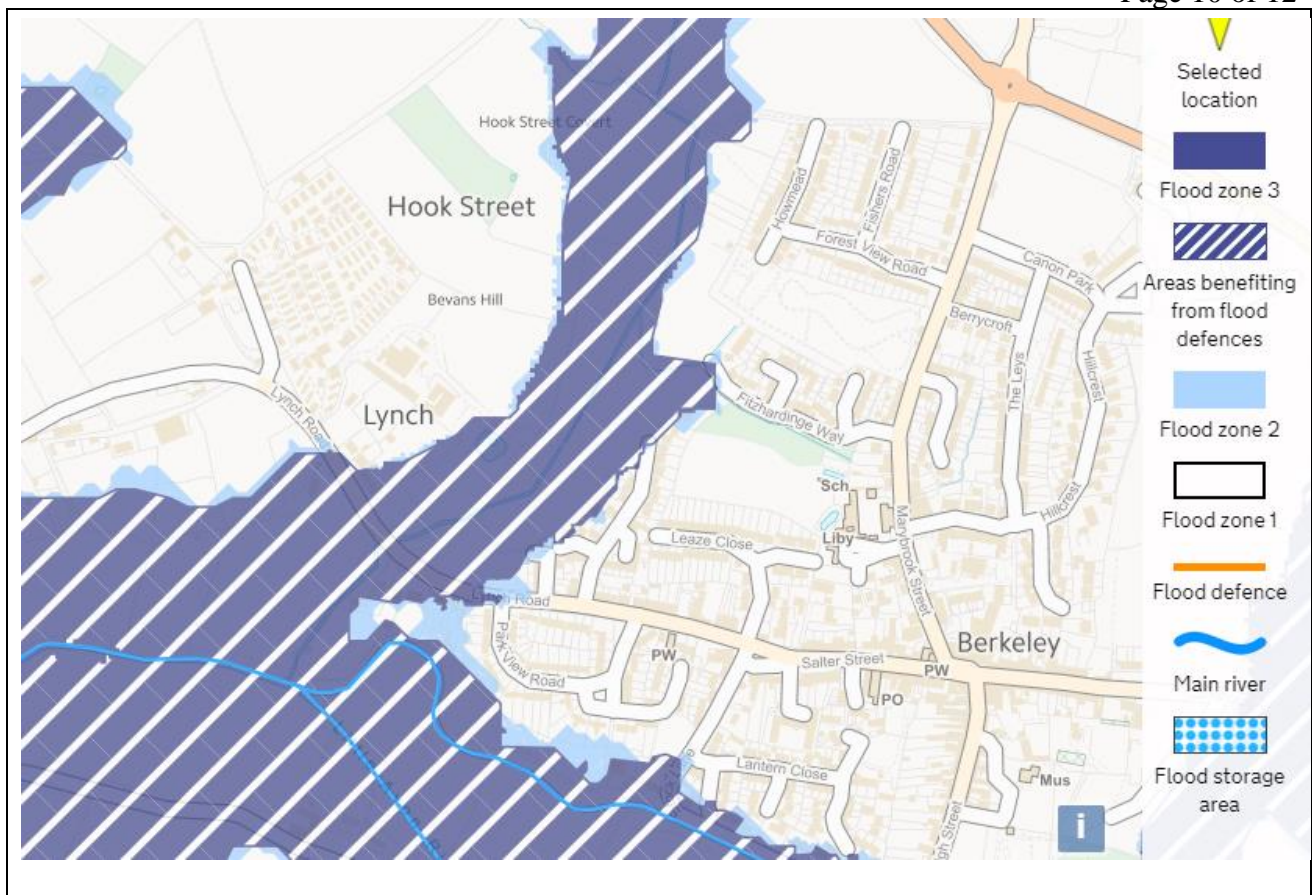
**Qu.7b Do you support or object to the development of a site identified at: (BER017) Bevans Hill Farm, Lynch Road, Berkeley?**

- Support
- Object

Please explain

The site is on greenfield land. An area of the site to the east lies within Flood Zone 3a or 3b but does not comprise more than 50% of the site's total area. However, in the absence of a SFRA, the Environment Agency provides information on the site – to the extent that the entire site would appear to be within Flood Zone 3 and the area benefits from flood defences. The SA only records this as a single negative.

It is considered that this site is not suitable for development.



**Qu.7c Do you support or object to the development of a site identified at: (HAR017) Land at Sellars road, Hardwicke?**

- Support  
 Object

Please explain

HAR1 Land at Sellars Road which has the potential for 15 dwellings is well located in a sustainable location and adjacent to a recently developed site.

**Qu.7d Do you support or object to the development of a site identified at: (STR065) Beches Green Health Centre, Stroud?**

- Support  
 Object

Please explain

No comment, this site is a small site in Stroud which will contribute to the range and choice of sites

**Qu.7e Do you support or object to the development of a site identified at: (WHI012) Land south of Hyde Lane, Whitminster?**

- Support  
 Object

Please explain

There are other sites which have been promoted at the village of Whitminster which are considered to be better located in terms of access and relationship to the village –i.e. land east of School Lane and extending the proposed allocation West of School Lane.

**Qu.8 Are there any other sites that you would like to be considered for future housing development?**

- Yes, I would like to suggest a site.** Please describe the location and/or identify it on a map and explain your reasons. (Maps / files can be uploaded via this online questionnaire, after answering this question). Although we are keen to identify any sites with future potential, the Council has limited scope to pursue sites that are not actively promoted to us by a landowner or developer.
- Yes, I am a landowner / agent / developer and I would like to submit a new site.** If you would like to promote an alternative site that has not previously been considered as part of the Local Plan Review or Strategic Assessment of Land Availability (SALA), please also fill in the Site Submission Form that can be found at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview) - the form can be uploaded here or you can send it to us separately. (Please clearly identify in any accompanying email or letter that you have also responded via this online questionnaire, so that we can easily link the responses up).

Comments

**File uploads Please upload any maps, supporting information or completed Site Submission forms here. Allowed file types include PDF, jpg, jpeg, doc, docx, xls, xlsx**

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## 6. Potential growth points

**Qu.9a Do you support or object to the development of Potential Growth Point 1 (PGP1) - Land at Grove End Farm, Whitminster. Including SALA sites WHI007 and WHI014. Potential for up to 2,250 dwellings, 13 hectares employment, local centre, primary school, community facilities and open space. Please explain why you support or object to the development of this broad location. If your comments relate to a specific site within the broad growth point area, please reference the SALA site number(s).**

Support

Object

As part of a strategy which provides a range an choice of sites, Land at Grove End Farm, PGP1 is supported (site ref WHI014)

Land at Grove End Farm Whitminster has been promoted to the Council in response to the Draft Local Plan Consultation in January 2020. The site's sustainability and deliverability credentials are such that whether or not it is considered as an alternative to Sharpness or Wisloe it should be allocated as an additional growth point to ensure that the Local Plan's housing requirement is met thereby meeting the Government's objective to significantly boost the supply of homes.

Paragraph 1.25 of the Sustainability Appraisal (2020) states that : *"A new growth point would support new service and infrastructure provision which could help to reduce the need to travel by private vehicle in the plan area as well as potentially supporting infrastructure which could support the use of energy from more sustainable sources. Importantly, it would also ensure that housing need in the plan area is met by delivering a high level of development at a single location. This approach could also support a large amount of affordable housing delivery in Stroud District."*

The site provides the opportunity to deliver a comprehensive mixed use development which links and complements the existing settlement pattern and provides for housing, employment, social and recreational needs with access to extensive green infrastructure.

The location of this land at the confluence of the A38/M5 and A419 corridors, and relative proximity to Stroud/Stonehouse, Cam/Dursley and Gloucester presents an opportunity to achieve a mixed use development in a sustainable highly accessible (including by public transport) location.

The SA recognises the benefits of this location e.g. the existing strategic road access could help make the area attractive as a location for inward economic investment.

The SALA Assessment 2020 has been undertaken for the whole site and concludes that the site is suitable, available, achievable and that the site has potential for development to include a planned and comprehensive growth point development including housing, local centre incorporating retail and community facilities and employment, together with the creation of open spaces and landscaped buffers with the M5 and A38/A419. Detailed masterplaning of the site would be required, but at this stage it is noted that the site is being promoted for up to 2,250 dwellings, 18.3 hectares of employment land, a local centre, school and green infrastructure.

The SALA refers to the there being a gas main crossing the site. RHL is fully aware of the high pressure gas pipeline that has been identified as a potential constraint to development of part of the land at Grove End Lane.

- RHL are in discussion with Wales and West Utilities (WWU) which has confirmed it can be diverted and/or reinforced following a study for the works which RHL are about to initiate.
- Reinforcement will reduce the easement to a 'standard' distance which we understand to be circa 6m.
- We confirm that the ability to reinforce and/or divert the pipe and thereby reduce the impact this will have on built development is being taken into account in the design of the masterplan layout together with the opportunities provided by the easement for creating a strategic open space for cycling and walking routes through the development

In conclusion having regard to the mitigation measures available it is not considered the high

pressure gas pipeline will constrain the capacity to achieve the development proposed for land at Grove End Farm Whitminster.

The site is within the control of a highly experienced employment and residential developer/promoter with a proven track record of delivering strategic sites in Stroud and indeed across Gloucestershire. In recent years land West of Stonehouse has been brought forward through the adopted Stroud Local Plan.

An update to the Position Statement that was originally submitted in January 2020, has been prepared and sent to the Council in time for the consultation so that it could be available on the website.

The Position Statement (October 2020) states that survey and assessment work is ongoing and an emerging concept plan has been prepared which identifies how approximately 2,250 new homes along with employment land, a local centre, sports/recreation facilities and two primary schools, landscaping and open space could be accommodated.

It is considered the Site's highly accessible location and lack of any overriding physical/environmental constraints presents an opportunity to achieve a sustainable mixed use development, whilst respecting landscape, heritage and ecological considerations.

**Qu.9b Do you support or object to the development of Potential Growth Point 2 (PGP2) - Broad location at Moreton Valence / Hardwicke. Including SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009. Potential for up to 1,500 dwellings, employment land, local centre, primary school, community facilities and open space. Please explain why you support or object to the development of this broad location. If your comments relate to a specific site within the broad growth point area, please reference the SALA site number(s).**

- Support
- Object

PGP2 is not supported as it appears a disparate grouping of sites that have not been promoted collectively. As far as we understand the option is not promoted by a landowner and so cannot be considered as suitable option.

Sites located on the edge of Gloucester are more likely to meet Gloucester's needs, rather than those of Stroud District. The Draft Local Plan (November 2019) at paragraphs 2.30 – 2.32 states that in the long term the Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury has identified that additional sites will be required to meet Gloucester's housing needs beyond 2028. Paragraph 2.31 states that *"An assessment of potential alternative sites to meet Gloucester's long term housing needs has identified that sites within Stroud District at the Gloucester Fringe are functionally related to Gloucester and offer the potential to meet Gloucester's needs in accessible locations."*

At the time, pending further work on the JCS, the site of Whaddon was proposed to be safeguarded in the Stroud Draft Plan to meet Gloucester's needs. The Draft Plan indicated that further work would be required with the neighbouring authorities before the Local Plan is finalized to agree how Gloucester's unmet needs are accommodated. The JCS Review has not progressed in the last 12 months, so there is no further update on what Gloucester's needs are or indeed how they will be met. However, changes are proposed to the Standard Method that would lead to an increase in the housing needed within the JCS area. The Government is expected to make an announcement on the changes to the Standard Method, consequently it is considered that land around Moreton Valence should be considered in this context rather than meeting Stroud District's needs.

In the Draft Plan the site at Whaddon is safeguarded to meet the future housing needs of

Gloucester City should it be required and provided it is consistent with the JCS. Subject to the forgoing the site will be allocated for a strategic mixed use development, including 2,500 dwellings.

Irrespective of the possible allocation at Whaddon to meet the needs of the JCS, land on the Gloucester fringe is meeting approximately 20% of Stroud District's needs. To proposed a further growth point at Moreton Valence for up to 1,500 dwellings would increase the number of dwellings in this location meeting Stroud's needs. This would result in approximately 32% of the districts housing needs being met in the north of the district. It is considered such an approach is not meeting the districts needs where they are arising in the most sustainable locations, with too much focused on the northern part of the district.

Land at Grove End Farm is well placed in terms of its relationship to the main settlements of the District, Stroud and Stonehouse being Tier 1 settlements and being located at the confluence of the A38/M5 and A419 corridors, and relative proximity to Stroud/Stonehouse, Cam/Dursley and Gloucester presents an opportunity to achieve a mixed use development in a sustainable highly accessible (including by public transport) location. Consequently, it is considered that land at Moreton Valence /Hardwicke is not a sustainable location to meet the needs of Stroud District.

Furthermore it is noted that the Sustainability Appraisal records that that a portion of the central area of the Moreton Valence/Hardwicke growth point option lies within higher risk flood areas. Whilst each option contains substantial portions of Grade 3 agricultural land, the land by Moreton Valence/Hardwicke (PGP2) also contains a small area of higher value Grade 2 agricultural land.

It is also noted that in the 2019 SALA Assessment Site HAR015 Land at Moreton Valence was rejected and is listed in Appendix 4

*"The site is not suitable for housing development as this would materially and adversely alter the rural character. There is a likely high landscape impact from housing development (in a relatively remote location) adversely affecting the open rural character of the flat Severn Vale landscape and visible from the escarpment edge of the AONB. The city edge would be perceived to have moved southwards significantly as a finger into the flat open countryside. Overall, this site has significant heritage constraints. The site's sensitivity relates to the sense of Grade II\* Hardwicke Court's place in the landscape, the character and identity of Hardwicke as a distinct historic settlement and the perception of a social and economic hinterland comprised of a network of farmsteads and clustered cottages - including the two Grade II listed farmhouses within the site boundary, and Grade II Hiltmead Farm, just outside the site. Their character and historic significance is drawn from the rural context and landscape setting. Any development would have to address potential flood risks. There are therefore potential impacts preventing sustainable development in this location."*

Site HAR016 Land to east of A38 at Moreton Valence is also in the list of rejected sites:

*"Site forms part of larger site assessed as HAR015. The site is not suitable for housing development of this scale as this would materially alter the rural character detrimentally. There is a likely high landscape impact from housing development (in a relatively remote location) adversely affecting the open rural character of the flat Severn Vale landscape and visible from the escarpment edge of the AONB. The city edge would be perceived to have moved southwards significantly as a finger into the flat open countryside. Any potential development would have to address high water table and flood risks. There are therefore physical constraints and potential impacts preventing sustainable development in this location."*

Given the above assessment it is not clear what circumstances have changed which have resulted in both HAR015 and HAR016 being considered as potential sites.

Site HAR006 Summerhill Equestrian Centre is included in Appendix 4 Rejected Sites in 2017 which concludes that *"The site is not suitable for housing/employment/community development because the site is isolated and detached from the Gloucester Urban Area and has physical constraints relating to current active sport/recreation use and flood risk. There are therefore constraints/potential impacts preventing sustainable development in this location."*

Site HAR007 Land at Hiltmead Lane is also included in Appendix 4 Rejected Sites which concludes

that:

*"This large area is generally not suitable for development because of the likely high landscape impact, isolated from any identified settlement and within open countryside. There are therefore constraints/potential impacts preventing sustainable development in this location."*

Site HAR008 Land at Parkend Farm is also included in Appendix 4 and the site is also rejected on the grounds that: *"The site is not currently suitable for housing or employment development because of the open rural character and relatively remote location relative to existing established settlements with services and facilities."*

Site HAR009 was included in the 2017 Appendix 3 List of Sites with Future Potential and was not considered suitable for housing development:

*"The site is not currently suitable for housing development because of the relatively remote location relative to existing established settlements with services and facilities as well as potential amenity issues with existing employment uses on site. There are therefore physical constraints preventing sustainable development in this location. However, there may be future potential to consider a small sensitively designed employment use within existing landscaping contained area."*

The SALA Assessment concluded that the site could be suitable for *"some potential limited further low density employment development typically comprising a mix of single storey/two storey offices, light industrial units, ideally within existing and established landscape buffers or potentially with new appropriate landscaping buffers and sensitive design."*

No evidence has been prepared to support the promotion of these sites, consequently an objection is made to Moreton Valence /Hardwicke as a potential growth point, individually these sites have been assessed previously and with the exception of HAR009 for some limited employment use, it has been concluded that the other sites do not have any potential. Furthermore as outline above even if these sites were considered in combination, any further development in this part of the district adjacent to Gloucester is not regarded as meeting Stroud's needs, there is no justification for almost 32% of the Districts housing needs (over an above existing permissions which includes Hunts Grove in this location) being met in this part of the district.

**Qu.10 Are there any other sites that you would like to be considered as a future growth point?**

- Yes, I would like to suggest a location that I think you should consider.** Please describe the location and/or identify it on a map and explain your reasons. (maps / files can be uploaded via this online questionnaire, after answering this question). Although we are keen to identify any sites with future potential, the Council has limited scope to pursue sites that are not actively promoted to us by a landowner or developer.
- Yes, I am a landowner / agent / developer and I would like to submit a new site.** If you would like to promote an alternative site that has not previously been considered as part of the Local Plan Review or Strategic Assessment of Land Availability (SALA), please state the name of the site below and fill in the Site Submission Form that can be found at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview) - the form can be uploaded here or you can send it to us separately. (Please clearly identify in any accompanying email or letter that you have also responded via this online questionnaire, so that we can easily link the responses up).

Comments

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## 7. Sustainability Appraisal

**Qu. 11** Please use the space below to provide comments on the Sustainability Appraisal that accompanies this consultation document?

Comments

Having read the SA and the assessment of the sites and the options, it recommends that the Council continue with a hybrid approach to the spatial strategy. Pegasus on behalf of RHL support this approach and consider that this best accords with the NPPF.