

December 2020

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# **Stroud Local Plan Review Additional Housing Options October 2020**

Land at Whaddon Fields, Gloucester

Prepared by Black Box Planning  
on behalf of Taylor Wimpey UK Ltd



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## 1. Introduction

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- 1.1. These representations to the Stroud Local Plan Review 'Additional Housing Options' public consultation (October 2020) have been prepared by Black Box Planning on behalf of Taylor Wimpey UK Ltd. The representations have regard to Taylor Wimpey's land interest at Court Farm, Whaddon Fields, Gloucester. A Site Location Plan is attached at **Appendix 1**.
  
- 1.2. Taylor Wimpey welcome and support the progress of the Stroud Local Plan Review towards the final draft plan in early 2021. The District Council is to be commended for continuing to progress the Local Plan Review in an effective manner throughout the COVID-19 pandemic.
  
- 1.3. These representations follow earlier submissions to the Draft Local Plan Consultation (November 2019). Taylor Wimpey continue to support the allocation of land at Court Farm, Whaddon (part of the G2 site) within the Local Plan Review as a strategic housing allocation. The land at Court Farm is sequentially the most sustainable strategic site for helping to meet the substantial requirements for market and affordable housing in Gloucester City and Stroud District. These representations confirm that the land controlled by Taylor Wimpey continues to remain available, suitable, and deliverable for development, as identified by the G2 strategic site in the Draft Plan.

- 1.4. The Council's proactive approach to the Government's recent consultation on the standard methodology by publishing the additional sites consultation is supported. Whilst uncertainty remains over the standard methodology following the Government consultation, the identification of potential additional sources of housing supply places the Local Plan Review in a strong position with a degree of flexibility to cater for whatever the standard method the Government confirms in due course. A critical source for this flexibility lies with intensification of proposed allocations with confirmed confidence of delivery.
- 1.5. The additional sites consultation is also helpful to further consider the most sustainable growth options in the District. Our earlier representations to the Draft Plan (November 2019) raised concern over how proposed allocations at Sharpness and Wisloe Green would perform in terms of sustainability and deliverability. Concerns over these strategic allocations is confirmed with reference to the draft local plan evidence base including the Sustainability Appraisal and the draft Viability Assessment. The potential for additional sites helps safeguard against a scenario whereby these strategic allocations fail to deliver due to unviable infrastructure costs, environmental constraints or lack of market appeal.
- 1.6. Throughout these representations, consideration is given to national planning policy requirements for plan-making as set out in Chapter 3 of the National Planning Policy Framework (NPPF), including paragraph 35 which stipulates the tests of soundness for examining local plans as follows:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.7. The representations are also put forward in the context of NPPF Chapter 5, *‘Delivering a sufficient supply of homes’*.

## **2. Additional Housing Options: Spatial Options**

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### **Question 1a: Option A - Intensify**

- 2.1. The intensification of sites (Option A) already within the Draft Local Plan is supported. The G2 allocation for 2,500 homes is considered a cautious estimate on the potential capacity of the site. Strategic allocations should ensure that land is used in an efficient manner and there are clear environmental benefits of intensifying use of greenfield land resource in this regard. Furthermore, higher density development can be achieved without compromising on the quality of living environment created. For example, higher density buildings can help shape character and placemaking alongside integration with multi-purpose areas of open space or green/blue infrastructure that offer genuine opportunities for recreational leisure activities such as walking, running and cycling routes and biodiversity net gain. Detailed masterplanning and the policy requirement for development briefs can help ensure high density housing on strategic allocations can be achieved whilst maintaining high standards of design.

- 2.2.** Intensification of the G2 site with average densities around 35dph and 40dph could yield closer to 3,000 homes across the allocation site. In this context, an updated masterplan for the Taylor Wimpey land at site G2 (Whaddon) is enclosed at **Appendix 2**. At an average density of 40dph, the Taylor Wimpey controlled land could yield 2,588 homes alongside over 42 hectares (105 acres) of green infrastructure/open space and 10.5 hectares (26 acres) safeguarded for an all-through primary and secondary school. The average density at 40dph includes for some 3-storey apartment block development presenting higher density development in two areas of the site, namely near the proposed local centre and the community core where local facilities/services/retail provision will be available.

#### **Question 1b: Option B – Towns and villages**

- 2.3.** Option B is partially supported when taken forward in combination with Option A and limited to more sustainably located towns and villages. Further sites in towns and villages could provide additional sources of supply having regard to usual planning considerations such as appropriate protection of areas of higher landscape values including the AONB. However, such an approach should only be considered second to, or in combination with, intensification of already identified strategic sites. In seeking to deliver sustainable patterns of development, the Local Plan must recognise that the District has large volumes of daily out commuting to work. It is therefore prudent to locate strategic growth in sustainable accessible locations to commuter destinations such as Gloucester. Not all towns and villages across the District are equally sustainable or accessible in this context. Additional growth at towns and villages will only increase commuting on the non-strategic highway network in the District and this option therefore only provides limited opportunities for additional growth. Development adjacent to Gloucester remains the most sustainable option for the District.

#### **Question 1c: Option C – Additional Growth Point**

- 2.4.** The additional growth points identified in the consultation paper offer strategic scale development. In the context of our previous submissions highlighting reservations regarding the deliverability of proposed allocations at Sharpness and Wisloe Green, the identification of the additional strategic scale sites for consultation is supported to ensure the local plan is robust for examination. However, the additional growth points should only be considered for safeguarded/reserve site status on the basis that the District Council has grave concerns over deliverability of an existing allocation in the Draft Plan going into examination. It is not considered necessary to allocate an additional growth purely on the basis of potential increase in the housing requirement for standard methodology at this stage. The Government needs to confirm the new methodology and furthermore the Plan will benefit for transitional arrangements or a review process within 5 years to cater for whatever increase in housing requirement may arise.

#### **Question 1d: Option D – Wider Dispersal**

- 2.5.** Option D is not supported. It is considered that such a scatter gun approach would deliver unsustainable patterns of development with heavy reliance on commuting to higher order settlements. The wider dispersal option will also encourage smaller scale development proposals due to sensitivities with lower tier settlements. Reliance on smaller scale developments risks inadequate levels of infrastructure delivery through development proposals.



**Question 1e: Option E – Hybrid/Combination Option**

- 2.6. Option A is supported as a matter of principle to ensure the efficient use of land. In the context of ensure the plan is robust and deliverable, Option B is supported in combination with Option A only.
- 2.7. Option C should only confirm safeguarded/reserve status for a preferred additional growth point should only be allocated if replacing an existing allocation which is considered less sustainable or questionable in terms of deliverability within the plan period.

**Question 1f: Option F – Suggested other strategy/spatial option**

- 2.8. No comments.

**Question 3: - A reserve site**

- 2.9. See answer 1c above.

**Question 4 b/d/e/f: reserve site support**

- 2.10. See answers to questions 1a through to 1e above.

**Question 4c: Additional Growth Point**

- 2.11. Having regard to the two sites identified for Option C, land at Whitminster is preferred on the basis that it is considered better positioned in respect of land assembly and therefore deliverability. The ability for this site to deliver employment land off Junction 13 would be more accessible to parts of the District that rely upon daily out commuting for work.

#### **Question 5: reserve site support**

- 2.12. See answer 1e above.

#### **Question 6: Trigger for delivery of a reserve site coming forward**

- 2.13. For reserve sites coming forward, it is prudent to emphasise that for a site to be allocated in the Plan, the District Council should be satisfied and confident that the strategic site in question will deliver. In addition to normal viability considerations, the Council should be satisfied that land assembly has taken place as multiple ownerships without an overarching promoter or strong evidence of collaborative working by land controlling parties, can cause substantial delay or fatal consequences for delivery.
- 2.14. In addition, the Council should have compelling evidence of house builder appetite, interest, and involvement in the strategic site in question. Without appropriate evidence in this regard, there can be genuine concerns over deliverability and the Council should consider whether it is appropriate to carry the allocation through to the final draft Plan.
- 2.15. Notwithstanding the above, having regard to the NPPF requirement for Local Plan reviews to be undertaken every five years, an appropriate trigger for a reserve site to come forward is a scenario whereby an allocated site has not received outline planning permission and first phase reserved matters consent within five years of the Local Plan adoption (unless the site is specified for delivery late in the plan period).

#### **Question 7 a/b/c/d/e: New SALA Sites**

- 2.16. No comments.

**Question 8: Any other sites**

2.17. No comments.

**Question 9: Whitminster and Moreton Valence**

2.18. See answer 4c above.

**Question 10: Any other growth point sites**

2.19. No comments.

**Question 11: Sustainability Appraisal**

2.20. No comments.