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Strategic Planning Manager  
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21 July 2021

Dear ██████████

**PRE-SUBMISSION STROUD LOCAL PLAN REVIEW: JOINT CORE STRATEGY AUTHORITIES**

1. Thank you for consulting Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (the JCS authorities) on the Pre-Submission Stroud District Local Plan Review (SDLPR).
2. Stroud District Council has engaged proactively and positively with officers of the JCS authorities on strategic planning matters through the Duty to Cooperate and we welcome the opportunity to respond at this important stage in the plan-making process. A collaborative approach has been taken between the JCS authorities and Stroud District Council in the preparation of several pieces of key evidence used to support strategic cross-boundary planning matters addressed by the Plan.
3. The following comments are intended to be helpful and enable continued positive engagement as the JCS Review progresses.

**Development strategy and core policies**

4. On a general note, the JCS authorities support the approach that Stroud District Council has taken in putting climate change at the centre of the strategy, whilst delivering the new homes and jobs that Stroud District, and Gloucestershire more widely needs. The approach aligns with the commitments of the district councils and county council in declaring climate change emergencies.
5. The JCS authorities support the strategic objectives set out at Section 2.2 of the SDLPR. The objectives align with the ambitions of the National Planning Policy Framework (NPPF), will lead to positive outcomes for residents and businesses and support the delivery of sustainable and healthier communities. Furthermore, there is general consistency with the objectives of the adopted JCS.
6. Paragraph 2.3.2 recognises the close relationship of the district with Gloucester City and paragraph 2.3.14 provides a useful summary of what the strategy means for different locations across the district. This includes Hardwicke and Hunts Grove, located on the Gloucester fringe, stating:

*'At Hardwicke and Hunts Grove, the strategy envisages: new housing development, community and open space uses to the south of Hardwicke; the continuing delivery of a new 'Local Service Centre' settlement at Hunts Grove, as established through the 2015 Local Plan; a focus on employment growth at Quedgeley East / Javelin Park; and access to new and enhanced facilities for residents and businesses'.*

7. Whilst it is noted that the site at Whaddon is identified as safeguarded land to meet the needs of Gloucester City, in the interests of completeness it would be helpful if this section also included some commentary on what the strategy would mean for this area of the district, should the site be taken forward for Gloucester's needs. In particular, reference within the SDLPR to the entering into of a memorandum of understanding, should the site subsequently be allocated, would ensure there is clarity as regards deliverability and the counting of the site for Gloucester's needs.

#### **Meeting Gloucester's needs**

8. Paragraphs 2.3.26 to 2.3.28 set out how the SDLPR seeks to support the delivery of unmet development needs for Gloucester City, stating:

*'The Joint Core Strategy for the Gloucester City, Tewkesbury Borough and Cheltenham Borough areas has identified that in the longer-term additional sites will be required to meet Gloucester's housing needs beyond 2028. Stroud District Council is committed to working together with these authorities and other authorities in Gloucestershire to identify the most sustainable sites to meet these future needs.*

*An assessment of potential alternative sites to meet Gloucester's long-term housing needs has identified that certain locations within Tewkesbury Borough and Stroud District at the Gloucester fringe are functionally related to Gloucester and offer the potential to meet Gloucester's needs in accessible locations.*

*At this stage, pending further work on the Joint Core Strategy Review, a site at Whaddon is safeguarded in the Local Plan to contribute to meeting Gloucester's needs.'*

9. This approach is supported. The JCS authorities can confirm that the JCS Review is progressing with a Regulation 18 consultation on a draft plan to be published later in the year, followed by a Regulation 19 consultation towards the end of 2022. It is noted that there is a planned oversupply in the SDLPR in respect of both housing (circa 1,000) and employment (circa 18ha). The next stage of the JCS process will present the preferred strategy for the review and identify reasonable alternatives to provide for development needs. As part of this process an urban capacity study will be undertaken in the coming months, from which it will be established Gloucester's potential housing shortfall, and any employment shortfall for the JCS area. There are a number of sites that have been allocated for Stroud on the Gloucester fringe, such as Hardwicke, Hunts Grove and Javelin Park. Given the proximity of these sites to Gloucester and the planning oversupply within the SDLPR, the JCS authorities would wish there to be an opportunity within the SDLPR, by way of memorandum of understanding or otherwise, that such sites may provide for unmet Gloucester/JCS needs, if required and in accordance with the JCS Review.

10. At the time of writing, across the plan period to 2041, Gloucester City currently has an unidentified housing requirement of approximately 6,000 dwellings, based on a calculation of housing needs against the Government's Standard Housing Method, minus sites that have been consented and allocated in the adopted JCS and Gloucester City Plan. In addition, there is a shortfall of 16 Travelling Showpeople plots arising from Gloucester's Travelling Showpeople community. Notwithstanding this, the City Council will continue to proactively seek to identify further development opportunities within its administrative area and an Urban Capacity Study will be undertaken later this year.

### **Strategic housing allocations**

#### ***General comments***

11. The strategy identifies several land allocations on Gloucester's urban fringe, to provide for Stroud District's development needs. Core Policy CP2 'Strategic growth and development locations' identifies the Hunts Grove extension be carried forward from the currently adopted Stroud Local Plan for 750 new homes, plus associated infrastructure. The site is located to the south of the consented Hunts Grove development, which already has planning permission. Further to this, a new allocation is proposed South of Hardwicke for 1,350 dwellings, plus associated infrastructure. As already noted, a safeguarded site is provided at Whaddon to provide for Gloucester's unmet development needs, albeit it isn't included in Policy CP2. To improve the effectiveness of the plan, it is suggested that the safeguarded Land at Whaddon is also included in Policy CP2 and references to possible memorandums of understanding included.
12. Specific comment is provided in relation to these sites later in this response. However, the JCS authorities comment that the approach to the identification of strategic urban extensions to existing urban areas can represent a sustainable approach to delivering strategic level development and aligns with the approach taken in the adopted JCS. However, it is important to ensure that such developments are genuinely sustainable, for example in providing the necessary on and off-site transport, social and community infrastructure, and integrate effectively with the main urban area. Urban extensions such as these should seek to ensure the prioritisation of sustainable modes of transport over the private car.
13. A concern for the JCS authorities relates to the wider impact of planned growth on the strategic and local highway network, given known issues within and adjacent to Gloucester. To support the Pre-Submission plan, it is noted that a Sustainable Transport Strategy has been undertaken by Mott MacDonald, which demonstrates that the quantum of growth proposed can be accommodated in the network, with interventions. On this matter, the JCS authorities will defer to the expertise of our statutory bodies, Gloucestershire Highways and Highways England. That said, the City Council reserves the right to respond to the detailed highways mitigation proposals as detailed in any subsequent planning applications for these sites.
14. As a point of principle for all strategic allocations, the authorities are pleased to see that the strategic allocations policies require the provision of local centres within the development, providing employment, local retail and community uses to meet the needs of future residents. This will be critical in minimising the need to travel and increasing pressure on other local facilities in the wider area, including Gloucester City. From a retail perspective, it

is important to ensure that the scale of development is commensurate to the role and function of the local centre and would not undermine the vitality and viability of other designated town centres in Gloucester City, and for this reason criterion C of Core Policy CP12 'Town Centres and Retailing' is particularly supported.

15. With regard to sports provision, it is noted that the strategic allocations policies require the provision of sports facilities in accordance with the supporting Infrastructure Delivery Plan (IDP). The IDP identifies that development on the 'Gloucester fringe' would create additional demand for built sports facilities, playing fields and other outdoor sports. Whilst some sports facilities would be provided within the developments, for example grass sports pitches and small-scale community halls, they are unlikely to provide more strategic sports facilities such as 3G pitches, sports halls and swimming pools. Given the functional relationship to Gloucester, it is likely the new communities would utilise facilities within the city, such as Waterwells Sports Centre, Blackbridge Sports and Community Hub (emerging), GL1 Leisure Centre and Oxstalls Sports Park. With this in mind, it is important to ensure the developments contribute to upgrading or provide additional facilities where appropriate. It is questioned whether the IDP is entirely robust in that it only considers facilities within Stroud District, not those in adjoining authorities but located within the catchment.

***Policy G1: Land at Hardwicke***

16. Land at Hardwicke is identified as having the potential to deliver 1,350 dwellings to provide for Stroud District's needs. The main concern for the JCS authorities is to ensure that the level of growth can be accommodated on the immediate and wider highway network, and that the development provides as much of the community and social infrastructure needs as possible.
17. It is noted that the policy requires the provision of a 3 Form Entry primary school including early years, and this is supported. In terms of secondary school and further education provision, the policy requires contributions towards provision elsewhere. In this regard, it is important to ensure that there is capacity, or that capacity can be created, to accommodate the level of demand generated. This is because there are already known to be a shortfall of school places within the Gloucester City area.
18. The same is true for healthcare provision, in that the policy either requires a site for a new surgery within the development, or a contribution towards the extension of existing healthcare facilities at Kingsway to support the development. Kingsway Local Centre is still developing but was intended to provide the needs of the new Kingsway community, originally 2,750 new homes. Since then, additional new homes has been brought forward and there have been recent planning consents for more. On that basis, it is important to ensure that capacity exists, or can be created, to provide for the needs of an additional 1,350 new homes. Furthermore, it is noted that there are other healthcare facilities that are closer to the allocation than Hunts Grove, it is likely therefore that those facilities will be first choice for new residents and could place undue pressure on them. The preference would be for the healthcare facility to be provided within the south of Hardwicke development, so that it meets its own needs and reduces the need to travel, particularly by the private car.
19. As mentioned earlier in this response, the City Council has concerns regarding the impact of the scale of planned growth in this area on the immediate and wider highway network, particularly M5 Junction 12 regarding this site, where it is understood there are already capacity issues. However, it is noted that the evidence prepared by Mott MacDonald

demonstrates that that the level of growth can be accommodated with interventions and provides an appropriate level of evidence for plan-making purposes. As statutory consultee in this regard, the JCS authorities will defer to the expertise of Gloucestershire Highways and Highways England to respond regarding the robustness of this evidence.

20. Finally, to ensure against future urban sprawl, it would be helpful for the policy to include a requirement to create a firm edge of the development to the southern extent of the site.

***Policy G2: Land at Whaddon***

21. The JCS authorities support the safeguarding of this site to meet Gloucester City's unmet development needs, including residential development and plots for Travelling Showpeople, for which there is currently unmet need, should it be required and in accordance with the JCS Review Strategy. The site is in close proximity and has a functional relationship to the city. The policy supports the delivery of active travel and the use of other sustainable transport modes, to reduce the need to use the private car. The site would allow needs arising from Gloucester's communities to live and work in close proximity to the existing Gloucester community.
22. Stroud District Council have engaged proactively with officers of the City Council in determining this policy and is pleased to see that there is a requirement for the site to deliver a mix of type of tenure of new homes that align with those required by Gloucester City, including 30% affordable housing.
23. Furthermore, the JCS authorities support the requirement for a 3 Form Entry primary school and 2 Form Entry primary school, both with early years provision, plus contributions towards the provision of 3.5 Form Entry secondary school, with sixth form. There is an identified shortfall in school places within Gloucester City and this will go some way to addressing that deficit for needs arising from the city and the wider area. At the time of writing it is understood that an assessment of alternatives is being undertaken for the location of the secondary school, but the inclusion of this requirement in the policy ensures at least one opportunity is made available within the primary catchment it would serve.
24. As mentioned earlier in this response, the City Council continues to have concerns regarding the impact of the scale of planned growth in this area on the immediate and wider highway network, particularly St Barnabas Roundabout. However, it is noted that the evidence prepared by Mott MacDonald demonstrates that that the level of growth can be accommodated with interventions and provides an appropriate level of evidence for plan-making purposes. As statutory consultee in this regard, the JCS authorities will defer to the expertise of Gloucestershire Highways and Highways England to respond regarding the robustness of this evidence. The City Council reserves the right to respond to the detailed highways mitigation proposals as detailed in any subsequent planning applications for this site.
25. As a point of clarity, the wording of the policy at G2 identifies the site should deliver 'at least' 2,500 homes, but elsewhere in the document the capacity is referred to as 3,000 new homes. To improve the effectiveness of the plan, it would be helpful if the anticipated capacity could be confirmed. In principle, the JCS authorities support an approach that maximises capacity, whilst delivering a high-quality place to live with sufficient social and community infrastructure, including green and blue infrastructure.

26. Furthermore, the JCS authorities have concerns regarding the effectiveness of the policy and suggest this could be addressed through the inclusion of a trigger / mechanism for the point at which the site would move from a safeguarded site, to an allocation and/or the entering into a memorandum of understanding.

***Policy PS30: Hunts Grove extension***

27. As stated elsewhere in this response, the primary concern relates to the provision of adequate community and social infrastructure and impact on the immediate and wider highway network. It is noted that the policy includes the requirement for a local centre to provide the needs of the new community and this is supported. In terms of transport impact, the JCS authorities will defer to the expertise of Gloucestershire Highways and Highways England as experts on this matter. But again, Junction 12 of the M5 is a particular concern.

**Strategic employment allocations and economic development**

28. In total, the assessed additional employment land need for Stroud District amounts to 50.9 – 60.3 hectares, and the SDLPR allocates 79 hectares of additional employment land between 2020 and 2040. Site allocations for employment use are made at various strategic allocations, either as part of wider mixed-use developments or solely employment. It is noted that none of the strategic allocations directly abutting Gloucester City include employment provision (except for local service centres), but that near Gloucester 27 hectares is allocated at Javelin Park and 5 hectares at Quedgeley East Extension (Policy CP2). Further afield, allocation are made at Stonehouse and Sharpness for a total of 32 hectares.
29. The strategy aims to support employment growth along the M5 corridor, building on strengths in existing provision. This aligns with the strategy of the adopted JCS, which seeks to provide employment and housing needs close to where the needs arise and aligns with the aspirations of the Gloucestershire Strategic Employment Plan and emerging Gloucestershire Local Industrial Strategy.
30. As mentioned earlier in this response, the JCS Review is progressing and the next stage will consider the employment strategy to be progressed, and the amount, type and location of potential allocations. Given the planned oversupply in the SDLPR, the JCS authorities would wish that there is an opportunity within the SDLPR that site the proximity of may be considered, by way of memorandum of understanding or otherwise, for unmet Gloucester/JCS needs, should they be required and in accordance with the JCS Review.

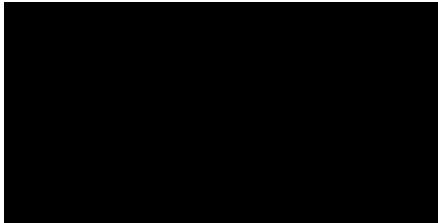
**Internationally designed sites**

31. The Gloucestershire district authorities have and continue to work in a positive and proactive manner in considering and addressing the impact of growth on Special Areas of Conservation, Special Protection Areas and Ramsar sites. This has included collaboration in the preparation of the Cotswolds Beechwoods Recreational Study and subsequent Mitigation Strategy. The JCS authorities will continue to work together in addressing this matter as the JCS Review progresses.

**Conclusions and next steps**

32. Overall, the JCS authorities broadly support the Stroud District Local Plan Review, particularly the safeguarding of land to provide for the unmet development needs of Gloucester City. At the time of writing, the JCS Review is progressing and will consider development needs, a spatial strategy and site opportunities. As the review progresses, it will be necessary for the JCS authorities and Stroud District Council to continue to engage in relation to the safeguarded site 'Land at Whaddon', and to consider other reasonable opportunities to address unmet development needs such as residential and employment land, including those on the fringe of Gloucester, should they be required and in accordance with the JCS Review.
33. The JCS authorities look forward to continuing to work with Stroud District Council positively and constructively on strategic planning matters.

Yours sincerely,



**Senior Responsible Officer  
Joint Core Strategy**