



Stroud Local Plan Review

Regulation 19

Representations on behalf of
Colethrop Farm Ltd

Ref CP004

Date July 2021

Rev -

Client Colethrop Farm Ltd

Copperfield - Hollywood Estate - Hollywood Lane - Cribbs Causeway - Bristol - BS10 7TW

E: info@copperfieldltd.co.uk

W: www.copperfieldltd.co.uk

Registered Office - Blackbrook Gate 1 - Blackbrook Business Park - Taunton - TA1 2PX - Registered in England and Wales No. 13002386



Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

Document Control

Project Name:	Hunts Gove and Haresfield
Project Reference:	CP004
Report Title:	Regulation 19 Representations
Doc Reference:	210710.rep.reg19.stroud.01

	Name	Position	Signature	Date
Prepared by:	■	Director	■	July 2021
Approved by:	■	Director	■	July 2021

For and on behalf of Copperfield L&P Ltd

Revision	Date	Notes	Prepared	Approved
-	-	-	-	-

This report and the content herein have been prepared by Copperfield L&P Ltd for the client and project described in the particulars of the instruction.

This report has been prepared in accordance with the professional services appointment related to the project.

Unless by written consent of Copperfield L&P Ltd it should not be relied upon by any third party beyond the instructing client. Copperfield L&P Ltd accepts no duty or responsibility (including negligence) to any party other than the client and disclaims all liability to any such party in respect of this report

1. Introduction

Background

- 1.1.1 Copperfield is instructed by Colethrop Farm Limited (CFL) to submit representations to Stroud District Council (SDC) in relation to the Regulation 19 Stroud District Local Plan Review (eSDLP). The draft local plan is being consulted upon until 21 July 2021. Previous representations were submitted to the last local plan consultation by Stantec on behalf of CFL, which should be read alongside this set of representations.
- 1.1.2 These representations are made in relation to land owned by CFL at Hunts Grove (proposed allocation PS30), Quedgeley East (proposed allocation PS32) and Haresfield (Omission Site-Appendix A). The representations relate to these parcels of land, which from previous submissions, the Council is aware of. The purpose of these representations is to identify where CFL believe the emerging local plan is not yet sound (having regard to the NPPF2019 tests of soundness) and to suggest how it may be amended prior to examination by the Secretary of State.

Summary

- 1.1.3 CFL commends Stroud District Council on their progress with the emerging local plan and support much of what is being proposed, whether this is responding to design quality, sustainable mixed-use development, or climate change. It is however important that, to achieve these objectives, the plan is realistic and comprehensive in its overall strategy as well as responding to the individual needs of the diverse communities within the district. Providing a balanced response through the local plan to address the wide range of development and environmental needs of the district will require a positive and, in some cases, bold approach by SDC. It is also important that SDC respond to national planning policy expectations positively, such as ensuring that housing and economic development is provided with enough support to progress to the delivery phases of development quickly and efficiently.
- 1.1.4 In response to the consultation document, CFL's comments can be summarised at this stage as:
- Support for a flexible plan that provides enough land to fully meet housing need set by the Standard Method plus a reasonable contingency.
 - Land at Hunts Grove Extension (750 homes) is already allocated for housing in the adopted Stroud Local Plan and identified for continued allocation in the draft local plan. The site is in the process of being delivered by Crest Developments, CFL and other parties. It should remain an allocation in the emerging local plan to provide surety and guide planning applications.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

- Land at Quedgeley East Business Park forms an extension to the consented St Modwen scheme and is proposed to be allocated in the emerging eSDLP. CFL supports this proposal but suggests that it would be beneficial to align the plan with the overriding emphasis of MHCLG for flexible workspace options and a mixture of uses which may include some residential and other uses as part of a sustainable development.
- Land at Haresfield has been identified to SDC as a small housing site adjacent the village. Sites such as this can be beneficial in helping villages remain balanced and sustainable communities and is of a scale that could deliver community benefits in this case. CFL suggests that it is better to consider the allocation of a small parcel of land now, which will deliver benefits, rather than rely upon windfall development at settlements like Haresfield which has seen a decline in population and services. SDC is reminded that the NPPF2019 expects 10% of housing sites to be circa 1ha and to be identified through the development plan.

1.1.5 By way of conclusion, there has been much change in the Quedgeley / Haresfield area in recent years, including the construction of several major development projects. This has changed the landscape around J12 and supports the notion of further growth in this area.

2. Chapter 2 Making Places (The Development Strategy)

Vision

- 2.1.1 The vision set out on page 19 of the eSDLP is currently too vague and makes it difficult to relate to the subsequent policies of the plan. In this context it is not effective as presently written. CFL suggest the vision should:
- Identify the importance of Stroud and its strategic location and explain what the outcome of key eSDLP policies will be.
 - The outcomes should be reasonably measurable whether in terms of qualitative or quantitative terms. An effective vision may set parameters for housing and economic growth as well as environmental and community outcomes. One example may be to reduce housing poverty by delivering 'x' market and 'x' affordable homes, another may be to support the self-containment of settlements and walkable neighbourhoods, both of which can be defined in quantitative and qualitative terms.
- 2.1.2 CFL suggest a clear vision expressed in these terms which addresses each chapter of the eSDLP would be effective.

Strategic Objectives

- 2.1.3 CFL support the inclusion of a strategic objective for Hunts Grove and Quedgeley East at paragraph 2.3.18, although it should be clear that Hunts Grove and Hardwick will deliver at least 2,000 dwellings. With the total delivery of circa 4,000 dwellings on this edge of Gloucester, the development strategy should emphasise its importance to ensure there is consistency between the text and the development strategy diagram on page 24 of the eSDLP.
- 2.1.4 Notwithstanding this, the eSDLP does not effectively address the rural areas sufficiently. The list of settlements at 2.3.21 ignores a wide range of other sustainable settlements or settlements whose sustainability and response to climate change could be improved through positive appropriate development. The eSDLP should provide a strategy for these settlements especially where consideration is being given to the production of neighbourhood plans. The eSDLP's silence regarding these settlements is not effective. Given their quantity within the district it is a strategic matter that should be addressed.
- 2.1.5 CFL suggest that for the plan to be effective, it should set a strategic objective of improving the overall sustainability of Tier 3, 4a and 4b settlements (note, CFL does not expect the detail of how this should be achieved to be included within the eSDLP).
- 2.1.6 The nature of Stroud District and the mix of urban and rural settings makes the transport and travel objectives important to balance. There are situations where much greater focus can be placed on encouraging very localised travel which supports pedestrian and cycle movement even at villages in Tiers 3, 4a and 4b. The pandemic has also shown that travel patterns can

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

and are changing. There is also a much greater need to enable the reduction of journey lengths. At present the eSDLP does not support the rural communities in this regard and should actively encourage growth to support the sustainability of smaller settlements such as Haresfield. The apparent marginalisation of private vehicle travel also seems to be an unrealistic and ineffective strategy within a polycentric local authority area such as Stroud and one which could be better balanced to meet the needs of all sections of the community (both rural and urban).

2.1.7 CFL suggest that an effective strategy should:

- Address the travel needs of smaller settlements either through improved local facilities and sustainability or increasing the choice of travel modes.
- SMART growth should be more widely supported by identifying and allocating development land in ways that reduce travel demand and journey lengths. This will support the declared climate emergency. Paragraph 104 of the NPPF provides relevant national policy.

2.1.8 Paragraph 2.3.24 of the eSDLP highlights the potential need for motorway junction capacity improvements at J12 of the M5. As part of this, it is important to understand that Hunts Grove is allocated in the adopted Local Plan. It has for several years therefore been committed development. For the emerging plan to be effective in accelerating the delivery of this well-established site that can be delivered quickly (given extensive completed background work and delivered local infrastructure reinforcement), the eSDLP should be mindful not create new delivery barriers that do not exist in the current allocation.

2.1.9 Regarding paragraphs 2.3.29-30 of the eSDLP, the plan acknowledges the delivery and timing of highway infrastructure improvements around J14 of the M5, Metrobus and Charfield Station, all of which are reliant on separate local plan process. CFL welcomes cross boundary working, but it is important the eSDLP is based on sound delivery expectations of this infrastructure. Given the emerging South Glos Local Plan may be delayed further by recent West of England Combined Authority announcements, the eSDLP should be capable of presenting delivery evidence to show any reliance on cross boundary infrastructure is realistic and therefore effective. If the eSDLP continues to rely on the south Glos Local Plan process to provide the delivery mechanisms for infrastructure that is needed for the eSDLP, then CFL would suggest an effective solution would be to provide a contingency mechanism elsewhere in the eSDLP policy framework. This mechanism could either be early review (with a specific timetable and triggers) or the identification of sufficient reserve land that would not be impacted by the South Glos local plan process.

2.1.10 Reference in SO5 (Climate change) to net zero carbon development is noted as is the Council's declared climate emergency. However, it is important that the eSDLP keeps in reasonable step with national policy and legislation. SDC will be aware of changes to Building Regulations (Part L) and the Future Homes Standard, amongst other emerging legislation. This has been subject to extensive viability testing and evidence from a wide range of industry representatives. To be effective, objective SO5 should be aligned with the national agenda

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

and not seek to pursue an alternative. It is particularly important that any deviation is subject to careful viability testing to ensure sites are deliverable in the context of wider sustainability matters, including the need and costs of addressing local environment, social wellbeing, and balanced economic growth. Carbon neutral development is only one of the facets of sustainability and a much wider view should be taken towards providing a holistic approach.

- 2.1.11 CFL find the suggestion at 2.4.6 that Hunts Grove is not sufficiently advanced to warrant 'New Settlement Status' as not being a positively prepared approach. Reserved Matters has now been granted for most of the land north of Haresfield Lane and a significant proportion of which has been built. Hunts Grove has a recognised status as a Parish and thus should be listed in the settlement hierarchy in Tier 2 to support the cohesion of this local community.
- 2.1.12 It would be helpful if the diagram on page 32 of the eSDLP were to include Hunts Grove/ Quedgeley East/ Javlin Park as a new settlement consistent with the text on page 31.
- 2.1.13 It is noted on Page 33 that Table 2 includes a small sites allowance of 1,275 dwellings. It is acknowledged, subject to consistency with paragraph 70 of the NPPF2019, that there will be some level of windfall housing delivery in the district. However, it is also important that the eSDLP balances this allowance with the expectation in paragraph 68(a) of the NPPF to identify 10% of sites in the development plan and brownfield register under 1ha. As such the eSDLP needs to be mindful of double counting small site allocations and also applying a windfall allowance. At present it is not clear how the eDLP addresses the 10% small site expectation? For the eSDLP to be consistent with national policy and effective, we would expect to see the windfall allowance reduced and replaced with identified site.
- 2.1.14 CFL remains concerned that paragraph 2.5.9 does not set out policies that amount to an 'overall strategy' as advocated by paragraph 20 of the NPPF. A significant proportion of the district's population reside in settlements not listed in 2.5.7 and 2.5.8 of the eSDLP. Paragraph 2.9 does not support the genuine sustainability of these communities and does not represent a collective strategy that supports this part of the plan area. Furthermore, improving the sustainability of these locations through appropriate growth will have a measurable positive impact on improving climate change. This is explored in response to policy DCP3
- 2.1.15 Table 4 on page 37 of the eSDLP is confusing. It sets a minimum employment residual requirement but then presents a range. The text at the top of page 38 (paragraph 2.3.6) further confuses the requirement by indicating a need of 'between' 62ha and 72ha. As with housing, employment should be expressed as a minimum and given that local plans should be aspirational (para 16(b) NPPF2019), then it should state 72ha as the minimum given this is the higher established need figure. This change would make the plan effective and therefore sound in this regard.
- 2.1.16 At paragraph 2.6.4 of the eSDLP it may be important to recognise the findings of the ELR(2021) and the need for warehousing at J12 of the M5 but the benefit of locating other types of employment generating uses in this location should not be lost. For the plan to be effective, the wording of 2.6.4 should better reflect paragraph 81(d) of the NPPF2019. This

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

could be addressed by noting support for other employment and mixed uses around J12 of the M5 to create balanced communities rather than single use zones. It is also noted that the eSDLP should refer to the newer more flexible land use categories for employment.

- 2.1.17 CFL continues to support the extension to Quedgeley East providing there is some policy flexibility about the delivery of mixed-use or employment led development that is better able to respond to changing local needs.

Core Policy DCP1 (Carbon Neutral by 2030)

- 2.1.18 Proposed Core Policy DCP1 policy should acknowledge the current national planning policy provisions set out within the Climate Change Act 2008, the 2015 Written Ministerial Statement and the NPPG (003 ID:6-003-20140612, 012 ID:6-012-20190315). CFL support a progressive move towards zero carbon in alignment with impending changes to Building Regulations (Part L and F) and other legislation.
- 2.1.19 CFL does not comment on the use of Future Homes Standard Option 2 in the HDH May 2021 Viability Assessment. However, given the HDH work is a key piece of important evidence, the fact it remains a 'Working Draft' leaves CFL with little option but to conclude the viability of delivering DCP1 alongside other plan requirements and S106 expectations is not yet justified. Once the working draft is finalised and is not subject to change, CFL may be able to conclude that pursuing a carbon neutral strategy 20 years ahead of national policy is viable when coupled with other development costs.

Core Policy CP2 (Strategic growth and development locations)

- 2.1.20 CFL supports the identification of at least 750 dwellings at Hunts Grove and 5ha of employment land at Quedgeley East. However, on the basis that Hunts Grove should be identified as a Local Service Centre (Tier 2 settlement), it would be ineffective to then refer to modest growth taking place in the text on page 55 of the eSDLP. The word modest should be removed and the policy will remain operational.

Core Policy CP3 (Settlement Hierarchy)

- 2.1.21 The Plan does not identify site allocations within or adjacent to Tier 4 villages. This is not sustainable for Haresfield or the rural community more widely. The development strategy for Haresfield in the draft Local Plan is to allow for up to 9 windfall dwellings adjacent to development limits. This is the total number of dwellings for the whole Local Plan period up to 2040 and in real terms amounts to a planned decrease in the local population as household sizes reduce. This will place pressure on in-commuting to support local services such as the school. A decreasing and ageing population also does not support the viability and vitality of the local communities which continue to suffer from the closure of services like Post Offices, public houses and leisure facilities in recent plan periods. The only way to reverse this trend is to carefully manage the delivery of small-scale growth especially where this offers local, wider community benefits such as affordable housing or the improvement/ delivery of community facilities.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

- 2.1.22 The Stroud District Settlement Role and Function Study (Update 2018) identifies Haresfield as a Tier 5 village. This is based on the village having facilities of primary school, pub, community hall, playing pitches and church.
- 2.1.23 Haresfield village has a role to play in providing development at a scale that is commensurate with the settlement. Development at Haresfield should be permitted to support and enhance existing rural services within the village. CFL is keen to work with the local community to provide a new community hall and improve playing fields, supported through residential development which bring both the finance and land to achieve this, but also maintains the critical mass of population needed to sustain such facilities.
- 2.1.24 New development would bring a younger population to the village, by attracting families with children and therefore supporting the primary school and community facilities; thus, reducing current in-commuting to fill school places. Modest development of around 20+ dwellings would help respond to a re-balancing of Haresfield in this regard.
- 2.1.1 Haresfield also needs to be considered in the context of wider growth around the village and how these impact upon its function. The Council should consider rural small settlements, which are located very close to strategic employment areas (such as Haresfield), for further modest growth (housing or mixed use). In such places, development may be able to support new community uses which enhance its long-term sustainability.
- 2.1.2 The general lack of a strategic approach for smaller villages is not consistent with paragraphs 77 and 78 of the NPPF. The Stroud District Settlement Role and Function Study Update 2018 does not address the impact of decline, but simply categorises villages according to their existing services. This type of laissez-faire approach does not get to the heart of the objective set by the NPPF2018:
- “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby” (NPPF2019 paragraph 78)*
- 2.1.3 The Stroud District Settlement Role and Function Study (Update 2018) does not consider the latter part of the NPPF requirement to look at combinations of settlements and their proximity and support for collective services. The study only considers each settlement in isolation of its surroundings.
- 2.1.4 CFL suggests that SDC should take a fresh approach to planning a sustainable development strategy for villages, as set out by Country Land and Business Association in the ‘Sustainable Villages – Making Rural Communities Fit for the Future’ report:
- Villages are not allocated housing and have very limited development options to improve their sustainability, leaving them in a cycle of decline;

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

- Sustainability assessments measure villages against a range of services and amenities more akin to how previous generations lived and used services; and
- Technology is shaping modern life and Councils should consider the availability of broadband in the sustainability assessments of villages.

2.1.5 CFL is not advocating major growth at villages, but rather a pragmatic and sustainable response to decline to enable the delivery of a plan which is effective across all parts of the plan area.

Core Policy CP4 (Place Making)

2.1.6 CFL is generally supportive of including a place making policy within the eSDLP. It is however now important that it mirrors the recently published National Model Design Guide Code (2021). Minor changes to the eSDLP would achieve consistency with the Code and thus it could align with National Policy.

Core Policy CP5 (Environmental Development Principles for Strategic Sites)

2.1.7 Whilst CFL is generally supportive of environmental design principles, as with CP4, it is important that the eSDLP is reviewed in light of the new National Model Design Guide Code (2021).

2.1.8 For the policy to be effective and clear, it should either seek compliance with the National Model Design Guide Code (2021) or set its own standards and dis-apply the national standard.

Core Policy CP6 (Infrastructure and Developer Contributions)

2.1.9 It is important that the eSDLP clearly identifies and timetables the delivery of strategic infrastructure within DCP6 so that development can occur without impediment. A plan which does not deliver this would be ineffective and not positively prepared to meet its minimum housing and employment needs.

2.1.10 The Council has recently published an IDP Main Report (June 2021) prepared on behalf of the Council by Arup, which sets out infrastructure requirements under a series of themed headings. The transport and highways section of the report highlights that the previous version of the IDP, dating from 2014 identified 14 pinch points on the road network in and around the district, including junctions 12, 13 and 14 of the M5 motorway, which were forecast to be approaching capacity towards the end of the Plan period. The current IDP notes that since then an update to the 2015-20 Road Investment Strategy (RIS1), which covers the period 2020-25 (RIS2). RIS1 did not identify any projects within the district, and the subsequent strategy, RIS2 does not allocate any funds to SRN improvements within the district. The IDP notes that levels of congestion on the motorway could constrain economic growth in Stroud, and by association adversely affect the deliverability of the Local Plan.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

- 2.1.11 The IDP notes that the Gloucester Fringe sub area connects to the SRN via Jn.12 of the M5 and that capacity concerns demand a solution to support the strategy of the Local Plan. The Gloucestershire Local Transport Plan (LTP) states that a scheme of improvements should be developed jointly by the District and County Councils working in partnership with HE. The strategically significant Cross Keys roundabout has been subject to recent improvements (2019) that were funded in part by S106 contributions from the development of Hunts Grove.
- 2.1.12 The transport modelling work informing the IDP shows that Jn.12 of the M5 is likely to be operating at capacity, with specific pinch points constraining the entry points to the B4008 and the northbound on-slip roads; an improvement scheme comprising a grade separated junction utilising two overbridges has been tested, but this is not yet fully developed and will require further development with HE. There is no indication within the IDP Main Report as to the likely cost of the mitigation scheme at Jn.12, or in respect of other pinch-point areas within the Gloucester Fringe that will require infrastructure improvements to the road network, although there is acknowledgement that demand management measures should form part of any solution. The report suggests that contributions will be sought from the main strategic allocations within the area: PS30 – Hunts Grove, PS32 South of M5 junction 12, PS43 Javelin Park, G1 South of Hardwicke, and G2 Land at Whaddon, with potential funding also sought from other schemes within the district given the strategic significance of the location.
- 2.1.13 The Hunts Grove extension is an existing development commitment forming part of the adopted development plan and as such should properly form part of the baseline for assessment when determining what infrastructure improvements are required to facilitate delivery of the emerging Local Plan allocations. Necessarily, the PS30 allocation (SA4) was subject to such consideration during the previous examination process. In this regard existing commitments should therefore benefit from any residual spare capacity that is available within the junction before pro-rata contributions are sought towards any improvement scheme. The policy should be drafted to ensure that contributions sought relate to the marginal impact that each development will have on the operation of the highway network; accordingly existing capacity should be assigned to existing commitments rather than treating all the proposed allocations listed above in the same way.
- 2.1.14 For the plan to be effective, it should explain in the supporting text how the Council will actively seek public as well as private funding from central government to support the delivery of housing and economic development in alignment with the eSDLP delivery trajectory. It is also important that the HDH viability exercise accounts for both the overall cost of infrastructure and the availability of public funds.
- 2.1.15 Reference to in-kind contributions is noted in the list of likely sources of funding for infrastructure, but this cannot be relied upon, nor can it form part of any future planning application balancing exercise where the contribution fails CIL Regulation test 122(2). To avoid the plan being inconsistent with national legislation it is suggested that criterion (i) is removed from CP6.

3. Chapter 3: Shaping the Future of Stroud District

Section 3.4 Shaping the future of Gloucester's rural fringe

- 3.1.1 CFL support the general approach to the Gloucester fringe and that Hunts Grove will form a Tier 2 settlement. As set out elsewhere in these representations, A significant part of Hunts Grove is now completed, so much so that the Hunts Grove Residents Association has now disbanded, and a formal Hunts Grove Parish Council has been established. It would therefore be wrong not to support the Parish and the plan should recognise this location as a Tier 2 settlement given its advanced stage of completion. The facilities that make Hunts Grove a Tier 2 settlement are either in place or are committed through S106 obligations.
- 3.1.2 CFLs first proposed modification in this regard is therefore to recognise Hunts Grove as a Tier 2 settlement, reflecting its material difference to the emerging Hardwicke proposed allocation.
- 3.1.3 It is noted in paragraph 2 of page 137 that this location includes several large employment allocations, but it is also important to note that there is an expected deliver of circa 2,000 dwellings. It would be clearer to highlight this important aspect of Hunts Grove, especially regarding supporting infrastructure works and the availability central Government funding.
- 3.1.4 The vision diagram and text on page 137 of the eSDLP is not clear about what “preserving Gloucester’s rural hinterland” means, to what area it specifically relates and how this is translated into other policies? The connection between the list of villages and the statement is unclear and is not clarified by the information contained on page 154 of the eSDLP which in respect of Brookthorpe and Haresfield is minimal.
- 3.1.5 It is noted the first paragraph on page 138 suggests J12 being a distinct and defensible limit to southerly expansion. The same text suggests the proposed employment sites represent an exception. This text is confusing as J12 is clearly not a development limit even without the proposed additional allocations. Land around J12 is developed on all sides with retail, leisure, distribution warehousing, and other industrial development such as the incinerator. Whilst the separate identity of Haresfield will be maintained, it is important to plan for a transition between these uses, the proposed allocations and the gap between them and Haresfield. CFL therefore believe the text in the first paragraph of page 138 is misleading and should describe land south of J12 as a transitional zone.
- 3.1.6 CFL object to the term ‘growth and development will be minimal outside strategic locations’ in the last paragraph of page 138 as it is unclear, undefinable and to some extent contrary to the proposed employment allocations which are strategic in scale.
- 3.1.7 It is proposed that the words ‘growth and development to meet local needs’ would be clearer in respect of housing and more capable of being defined against housing need surveys for example. Likewise, ‘strategic locations’ should be replaced with ‘allocated sites’.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

- 3.1.8 It is noted across pages 137 and 138 that a large area is highlighted in green and titled 'location for strategic housing and mixed-use growth'. The area encapsulates land well beyond the proposed Hardwicke allocations illustrated on the plan. It is not clear how this designation is to be interpreted? Furthermore, it is not clear how the LUC "Assessment of Strategic Development Opportunities in parts of Gloucestershire (Oct 2019)" can have informed this apparent land-use designation given the report highlights some missing data (either stating "TBC" or "?") and draws conclusions based on this?
- 3.1.9 The eSDLP appears to pre-determine a future growth pattern that is yet to be fully explored. Whilst it may be appropriate for plans to look forward beyond their operative timeframe, this kind of approach must be supported by evidence and be assessed through the Sustainability Appraisal process given it amounts to defining an area where growth beyond the proposed allocations could be deemed acceptable. If the LPA wish to retain the green circle 'location for strategic housing and mixed-use growth' designation for Hardwicke, then it should be drawn to only reference the proposed allocation and an immediate hinterland, not an area of x3 the size unless there is evidence to support this.
- 3.1.10 To ensure clarity within the Guiding Principles and therefore the effectiveness of the Plan the following should be highlighted within the text on page 140 of the eSDLP.
- (1) The Hunts Grove Tier 2 Local Service Centre settlement will be expanded by a further 750 dwellings (PS30) to create a community of around 2,500 homes when complete.
 - (2) Hardwicke will be extended to the south via an allocation for 1,350 new homes, a new local centre and additional community provision.
 - (3) Land at Whaddon is safeguarded for up to 3,000 dwellings to help meet the housing needs of Gloucester City upon demonstration of the need to allocate the land for development via a review of the Joint Core Strategy for Cheltenham, Gloucester, and Tewkesbury.
 - (5) Conserve and enhance the landscape character of the urban/ rural fringe to provide a high-quality setting and to create a geographical and functional distinctiveness to Hunts Grove and Hardwicke.
 - (7) The development strategy for the rural fringe will make necessary provision for the safe and efficient operation of Junction 12 of the M5 via the delivery of appropriately scaled improvements to the junction. The Council will work with the statutory agencies and delivery partners to secure funding for infrastructure improvements to support the growth strategy.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

Policy PS30 Hunts Grove

- 3.1.11 CFL support the over-arching policy which continues to allocate land at Hunts Grove and the reference to a net increase of 750 dwellings in paragraph 3.4.10. However, objection is raised to the inclusion of safeguarding of land for a future rail station on the basis this is not related to the PS30 allocation land.

Policy PS32 Quedgeley East extension

- 3.1.12 CFL support the allocation of land at Quedgeley East in principle, but object to the limited set of land uses that would be acceptable on the site (B2 and B8). Limiting a site in this manner is at odds with the Government's approach to flexible planning for business. It is also inconsistent with the new land-use classes recently adopted to provide necessary greater flexibility. CFL has maintained throughout various representations that this site should be able to deliver a greater mix of uses and types of employment generating development.
- 3.1.13 Part of the extension to Quedgeley East has planning permission (SA4a) and St Modwen is already nearing completion. CFL supports the principle of further employment in this location which has become a hub for new enterprise, alongside other development. However, CFL believe that the proposed PS32 allocation should include some flexibility of land uses to ensure that a balanced local community is maintained. For this reason, CFL suggest a sound approach would be to allocate the site for employment-led, mixed use development (inc the potential for housing, local retail and leisure/community uses. This would help to manage and support the relationship of the site with both Hunts Grove, Javelin Park and nearby Haresfield. CFL believe that it is sound from a place making perspective to avoid the creation of single use employment zones.
- 3.1.14 Such an approach would help support the reduction in commuting and assist in contributing to support the district in its efforts to address the climate emergency targets in the draft Local Plan. Such an approach would create a more balanced development on the south side of the M5, which would help to respect Haresfield while at the same time responding to the benefits of this strategically important location.

Policy PS43 Javelin Park

- 3.1.15 It is important that Javelin Park sits within the wider landscape context as highlighted by paragraph 3.4.13. The proposed policy approach to address the AONB is to buffer along the eastern and southern boundaries. CFL advocate a more careful approach that simply buffering development. The design scale and quality of buildings are also critical, and the policy should reference these aspects as well.
- 3.1.16 It is also expected that sites like this which will generate vehicular movements will contribute to the Strategic Road Network as well as the highway network, including J12. This is on the basis that sites like Hunts Grove are already commitments within the adopted local plan and must be accounted for within any future transport assessment work.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

Policy G1 South of Hardwicke

- 3.1.17 For the emerging allocation policy for Hardwick to be effective, it should ensure that proposals are compatible with those already in place to serve the current Hunts Grove allocation (continued into the eSDLP through policy PS30). The policy should also ensure that Hardwicke (and other proposed allocations) make appropriate contributions towards transport infrastructure, including the Strategic Road Network to support overall delivery.

4. Chapter 4 Homes and Communities

Core Policy CP7

- 4.1.1 CFL support the delivery of housing for a range of people. As with many of the other policies in the Core Strategy Review, CFL supports the application of the M4(2) accessibility standards which is becoming an industry standard.
- 4.1.2 It is also noted that the Council is seeking to apply M4(3) standards to a percentage of housing but raises no ability to review the viability of doing this. It is noted that the NPPG (ID 56-008-20150327) only requires this for dwellings over which the Council has housing nomination rights. Therefore, whilst it should be encouraged across all developments, it should only be required in these specific circumstances. This is to prevent many housing schemes suffering viability concerns given that cost increase estimates provided to the Government's Housing Standards Review by EC Harris estimated £15,691 per apartment and £26,816 per house. Again, this is something that should be considered as part of the whole plan viability exercise which is encouraged by national policy. It is not clear in the HDH report how this is provided for in the whole plan viability exercise.

Delivery Policy DHC1 and DHC2

- 4.1.3 Policy DHC1 appears to contradict the development strategy diagrams on page 57 of the eSDLP and Core Policy CP3. CP3 appears to suggest that small housing schemes adjoining the settlement development limit (ie on the outside edge) will be acceptable, subject to meeting criteria and other policies in tier 3b and 4 settlements. Policy DHC1 however appears to refer to villages but limits development to within their defined edges.
- 4.1.4 Policy DHC2 appears to clarify that at tier 3b and 4 settlements, development will be acceptable on the outside edges of these settlement boundaries if it meets 5 criteria. The criteria, however, are so restrictive that the ability to support these settlements in a sustainable manner will prove almost unachievable. For example, even if there is a clearly defined local need, if there is not a Neighbourhood plan, then that need cannot be met through new development. This is entirely at odds with paragraph 78 of the NPPF2019. To accord with the NPPF2019, it is suggested that only criteria 1 and 2 are retained.

Delivery Policy HC3

- 4.1.5 Given that the eSDLP should identify 105 of sites under 1ha and it includes a delivery allowance for small windfall sites, the additional expectation that 2% of strategic sites shall provide for self-build and custom dwellings will only serve to impact housing delivery. It is not clear where the evidence exists that show 2% of strategic sites will be taken up by custom or self-build builders or that given choice, 2% would prefer to choose smaller sites and windfall sites? The ability to deliver custom build and self-build alongside volume housing is complicated by CDM, Health and Safety and other such conflicts during the build process. This

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

often leads to empty land parcels within housing scheme that are not taken up. The additional requirements set out in criteria 1-4 of HC3 adds a further pre-application burden to prospective developers.

- 4.1.6 To balance the need to deliver larger sites at pace and to meet the needs of those who wish to build their own home (in accordance with paragraph 61 of the NPPF), SDC is encouraged to consider a positively worded policy which supports those who wish to bring forward self or custom build sites but not expect all strategic sites to meet this need.

Delivery Policy HC4

- 4.1.7 It is noted that criterion 6 limits the size of single-plot self or custom build affordable dwellings to 100sqm. This prevents larger families in need of an affordable dwelling being able to build to the minimum gross internal floor areas set out in the Nationally Described Space Standard for Housing (2015). It is not clear why SDC should seek to prevent persons in this housing group from being able to provide their own self or custom build dwelling on plots which are eminently suitable to accommodate a property of this nature.
- 4.1.8 Policy HC4 should remove this restriction.

Delivery Policy HC1

- 4.1.9 Policy HC1 appears to represent a catch-all policy which in CFL's view is almost impossible to align with. For example, criterion 3 suggests proposals should not appear as an intrusion into the countryside, yet it is often the case that greenfield development on the edge of settlements, which is needed to meet a specific housing need, could be perceived as an intrusion, even if it were appropriate for other sustainable reasons. Likewise, the reference to 'any overriding environmental or other material planning consideration' is entirely open to interpretation. It does not provide the necessary clarity and certainty that an applicant should expect when evaluating whether to invest in making a planning application. There are a multitude of policies within the NPPF2019, NPPG and other parts of the plan that address matters like this with greater clarity and therefore the policy is not effective. Criterion 3, 5 and 8 should either be better defined or cross referenced to relevant policies elsewhere in the eSDLP or NPPF2019.

Delivery Policy DHC6

- 4.1.10 CFL support the principle of improving the health and wellbeing and the role that new development should play in achieving this. It is, however, unclear how criterion 1 of the policy can be meaningfully addressed and therefore how it is effective as currently worded. It seems difficult to control how development can provide access to health, fresh and locally produced food? It is understood that developments can facilitate land for the delivery of allotments and orchards because these can form defined parts of a development proposal. Careful wording changes to Criterion 1 which refer to the incorporation of on-site, small-scale food production through allotments, edible street and community orchards would better define what may be the intent of the policy.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

Delivery Policy DHC7

- 4.1.11 The provision of open space and sports facilities is noted however the delivery mechanisms suggested in the policy could lead to a lack of clarity for applicants and developers. Whilst the policy does provide flexibility for on and off-site provision, it is less clear about whether aspects are addressed through S106 or a CIL tariff? If provision is on site, it would result in double counting if a developer were to also make a fixed CIL payment that covered off-site provision. It is therefore suggested that larger, strategic-scale facilities such as indoor swimming pools, sports halls and health and fitness suites may be best addressed through CIL and the remainder are either provided on site or contributions sought through S106 obligations. The approach would provide a more effective policy framework.

5. Chapter 5 (Economy and Infrastructure)

Core Policy CP11 New employment development

5.1.1 Paragraph 81 of the NPPF2019 explains that planning policies should:

“d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

5.1.2 Paragraph 2 of CP11 does not sufficiently provide that flexibility. The pandemic has forced many changes in working practices and it is expected that many businesses will continue to promote agile and home working for example. This is supported by the growing market for mixed use employment hubs where housing, employment and recreation are provided within a walkable neighbourhood.

5.1.3 As currently worded paragraph 2 of CP11 is limited to ‘safeguarding employment sites’ unless employment is intensified, and this does not address the opportunity for mixed-use employment led schemes. CFL suggest that the wording used in criterion d) of the NPPF be incorporated into paragraph 2 of CP11.

Core Policy CP13 Demand management and sustainable travel measures

5.1.4 Paragraph 16 of the NPPF2019 expects plans to contain policies that are clearly written and unambiguous. Whilst CFL believes CP13 is clearly written, further clarity is needed regarding parking standards and whether applicants should have regard to, or adopt the Council’s parking standards? The reason for clarity in this regard is the existence of parking standards produced by Gloucestershire Council which are different. It is important that applicants within Stroud District are given a clear unambiguous position to either use (as opposed to ‘having regard’ to) the GCC or SDC parking standards.

Core Policy EI4 Development at existing sites in the countryside

5.1.5 Criterion 3 and 5 of proposed policy EI4 appear to set barriers which are either unreasonable or not consistent with the NPPF. Criterion 3 appears to introduce a level of sequential testing of sites. The NPPF does not require sequential testing of employment buildings.

5.1.6 Criterion 5 uses a different definition of traffic impact than the NPPF. Criterion 5 suggests ‘significant traffic movements’ would be considered as a reason for refusal whereas the NPPF2019 uses the term ‘severe’. This is the national policy definition and the eSDLP should not seek to promote a contrary approach.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

Core Policy EI9 Floorspace thresholds for impact assessments

- 5.1.7 NPPF2019 floorspace thresholds are set to enable smaller retail businesses to locate outside town centres at a scale that has been determined to address local need. In a climate where the LPA encourages walkable neighbourhoods and community building, it is inconsistent with the NPPF2019 to then place a greater burden on smaller businesses. When applying for planning permission the plan should encourage mixed-use developments including retail and leisure that support the local community.

Core Policy EI12 Promoting transport choice and accessibility

- 5.1.8 The expectation that applicants should provide parking in accordance with Appendix C is noted and comments have been raised earlier regarding consistency with GCC standards and which takes precedence? However, to expect applicants to then justify why their proposal accord with a numerical standard appears to create an unnecessary burden. The LPA should only expect a justification if an applicant proposes a different standard, and a planning balance needs to be struck. As an LPA it would be unhelpful to set a standard and the challenge applicants on their justification if they meet the standard.

6. Chapter 6 Our Environment and Surroundings

Core Policy CP14 High quality sustainable development

- 6.1.1 Proposed Policy CP14 suggests applicants should consider the impacts on development from several sources including noise, air, water etc. Whilst it is reasonable to explore the impact of 'existing' sources, it is unreasonable to expect an applicant to determine the impact from 'potential' sources of pollution. The scope and ability to assess such theoretical impacts would be difficult for applicants to define. To make the policy clear, it should only refer to existing sources.
- 6.1.2 It is noted in the last paragraph of CP14 that the eSDLP highlights a list of documents the LPA wishes to receive with applications. It would help applicants to be provided with a specific list of expectations that then translates into the Council's Validation checklist. This removes ambiguity for the range of applicants that need to use this plan.

Core Policy CP15 A quality living and working countryside

- 6.1.3 It is understood that the Council wishes to encourage development of a particular scale on the outside edge of tier 3b, 4a and 4b settlements, but there is no evidence to suggest a limit of 9 dwellings is appropriate for all circumstances. Given that these settlement boundaries are very tightly drawn in many cases and there has been no planned development to maintain settlements over successive plan periods, some flexibility would create a more flexible policy that aligns with the NPPF2019. It is suggested that if the LPA wish to refer to 9 dwellings, then the criterion should also allow for greater delivery where there is a proven need, or it is logical and sustainable to make the best use of a defined site which may accommodate more development in line with the wider plan. The provision of some flexibility would not materially affect the spatial strategy and would respond to the NPPF2019 and the need to support all types of housing need including those of villages where the ability to maintain services relies on a local population within a sustainable and walkable distance.

Delivery Policy ES1 Sustainable construction and design

- 6.1.4 CFL support the need to address climate change and the move towards zero carbon development. The Government has over recent years established a route map for achieving this in a way that can be sustainably achieved. The Government has put in place legislation and has identified further legislation to enable this to be delivered at a local level. Specifically, the March 2015 Ministerial Statement and the NPPG (paragraphs 007 and 020 (references ID 56-007-20150327 and 56-020-20150327) support this. It is important the eSDLP aligns with the process set by the Government and that the full viability impacts of this are carefully managed through this local plan process.
- 6.1.5 Whilst HDH has prepared a viability assessment, it is not clear whether it fully balances the costs of strategic infrastructure, other infrastructure and the additional cost of advancing the

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

move to Carbon Zero without any phased introduction (unlike building regulations). Given that the emerging policy also relies on the Stroud Carbon Offset Fund, it would be helpful for details of this to form part of the Local Plan evidence base.

Delivery Policy ES6 Providing for biodiversity and geodiversity

- 6.1.6 CFL support the delivery of bio and geodiversity as part of new development. However, this should be aligned with the emerging statutory requirements of the soon to be enacted Environment Bill. Whilst it is therefore helpful for Policy ES6 to highlight how the statutory expectations may be exceeded and how this could be delivered, it should be a matter for development assessors to determine for each individual application. For clarity, it is also suggested the word 'minimum' for clarity. Any delivery above 10% should be the choice of the applicant as it may not be possible in all circumstances to achieve more than this (eg. some brownfield sites).
- 6.1.7 CLF also support the protection of designated wildlife sites, but the text in the eSDLP is not clear and could lead to misinterpretation because it does not refer to mitigation or compensation. Paragraph 175 of the NPPF takes a sequential approach first seeking to avoid harm, then mitigating and then compensating. If the policy is to remain in the eSDLP, then it should set of this approach more explicitly. Alternatively, there is a wealth of legislation through the Habitat Regulations, EIA Regulation, NPPF2019 and caselaw that can be relied upon if this part of the policy were to be removed.

Delivery Policy ES7 Landscape Character

- 6.1.8 Policy ES7 appears to differ from national policy regarding the AONB and is therefore not consistent with the NPPF2019. Paragraph 172 of the NPPF2019 sets two tests for major development in AONBs:
- (8) Exceptional circumstances.
 - (9) In the public interest.
- 6.1.9 Neither of these tests feature in the emerging policy. Likewise, it does not invite the level of assessment that the NPPF2019 seeks from applicants at a) to c) of paragraph 172. The national policy tests for development in AONBs are clear and concise and there is no need for the eSDLP to repeat or seek to re-define them.
- 6.1.10 It is also noted ES7 expects development to protect or enhance landscape character. The language used places an unrealistic barrier for larger scaled planned development which by its very necessity will impact in some manner on landscape character, but this is balanced against the need to house the population or create space for economic growth and stability in the most sustainable manner. An effective policy would, under criterion 1, support development that is aligned with the prevailing landscape character and seeks to minimise any impacts.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

7. Omissions

7.1.1 For reasons set out elsewhere in these representations, CFL continues to promote land for mixed use development adjacent the development boundary of Haresfield, as identified in **Appendix A**. There should be consideration in the Plan to a small site on the edge of Haresfield. The associated benefits include:

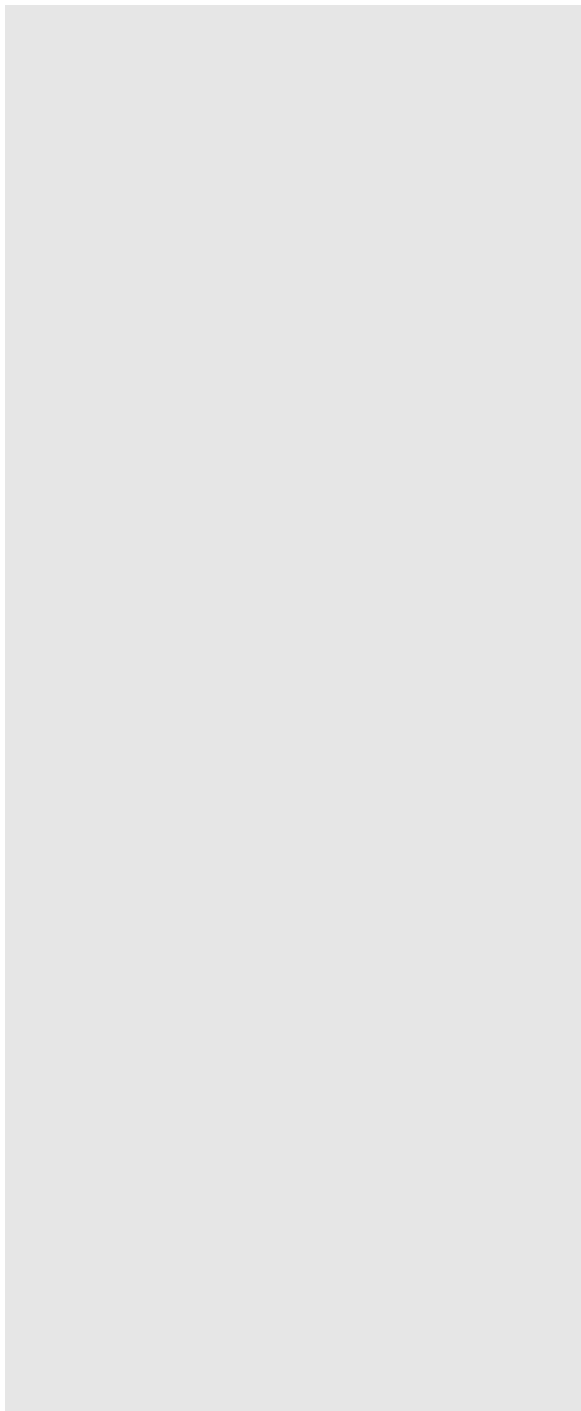
- (10) The site is immediately adjacent the development boundary of the village;
- (11) The mix of uses could include a new community building, improved playing fields and provision of affordable housing on the site;
- (12) New housing (approx. 20 dwellings) would support existing and proposed community facilities;
- (13) New housing would assist in bringing a younger population to the village to support the primary school and existing local services;
- (14) It could provide additional financial support to the Parish Council through Housing Delivery Grant; and
- (15) Haresfield is close to existing employment and community facilities/services - only 700m from existing/proposed employment at Quedgeley East Business Park and 1.5 kms from new Hunts Grove extension.

Project ref: CP004

Document ref: 210710.rep.reg19.stroud.01

Appendix A

Omission Site Plan- Land at Haresfield



\\fs1\inf\proj\49627_HurtsGrove\006 Local Plan
Repl\local Plan Regs Jan 2020\2020121_Hurts Grove -
Stroud LP Regs_Final_ISSUED.docx

