

# Representation Statement Stroud Local Plan

**In respect of:**  
Land at North East Cam (PS25)

**On Behalf of:**  
Terra Strategic

**By**  
McLoughlin Planning Ltd

**July 2021**





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3737-SK02 Masterplan Rev B

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Upthorpe Transport Technical Note



## 1.0 Introduction

1.1. Mcloughlin Planning has been instructed by Terra Strategic to submit representations on behalf of its land interests at North East Cam allocation PS25. In terms of this Regulation 19 Consultation, Terra wishes to make a number of representations about the policies contained in the Plan and highlight a number of elements which it has concerns with.

- Section 2 - Responses to individual Policies.
- Section 3 - Site Specific Representation.
- Section 4 - Response to Site Specific Policies.



## 2.0 Responses to Individual Policies

- 2.1. This Section of the Statement sets out Terra Strategic’s concerns with various policies in the Plan.

### **40 Key Issues - Pages 11 to 16**

- 2.2. Terra wish to make the following observations.

#### ***Affordable Supply (Page 12).***

- 2.3. References made to tackling an acute lack of affordable housing in the District. Terra supports the provision of affordable housing as part of development schemes and considers that a further key issue of the Plan in this regard is to ensure that sufficient levels of open market housing are provided to facilitate those levels of affordable housing sought in the Plan.

#### ***Maximising the potential of Brownfield and underused sites.***

- 2.4. Terra recognise that National Guidance promotes the use of brownfield sites as a means of meeting housing land requirements. However, this should not be at the expense of greenfield development sites. From the housing numbers proposed and the previous Local Plan, the Plan is heavily reliant on greenfield land to meet its housing requirements. Therefore, whilst the NPPF promotes brownfield land, this should not be at the expense of preventing greenfield development sites from coming forward in a timely manner.

#### ***Issue 18 Better transport systems to help reduce Co2 emissions.***

- 2.5 This issue fails to reflect the reality that Stroud is a predominantly rural district with communities spread throughout, and how could a better transport system be achieved when taking this into account as well as the economics of provision. Travel by the private car is an inevitable consequence and characteristic of developing in rural areas. That said, development at Cam offers opportunities for cycling and walking, as opposed to the private car.



### **Issue 40,**

- 2.5. The key issue is developing mitigation strategies to fund environmental projects. The concern here is whether this would meet the test in Paragraph 56 of the NPPF in terms of being necessary to make the development acceptable in planning terms.

### **Strategic Objectives for the future (Pages 20 and 21)**

- 2.6. SO1 – The phrasing of the Strategic Objective raises several questions in terms of what constitutes “affordable” and “quality housing for local needs”. The objective whilst laudable, is unclear in terms of is this referring to affordable housing as defined by the NPPF, or some other type of affordable housing as defined by the Plan but not appropriately justified.
- 2.7. Securing Zero Carbon development – Terra questions how this key issue will be achieved and by what metric this will be assessed. Zero Carbon has yet to be fully explained in Government Policy and the use of this terminology raises concerns around how this will be implemented by the council through the policies in the Plan.

### **Policy DCP1**

- 2.8. Terra consider this Policy to be unsound for the following reasons:
- 2.9. What is Zero Carbon – currently, there is no fixed Government definition as to what Zero Carbon is and the concern is that the Plan will apply standards that are simply unachievable or add costs to development which is unnecessary. Further clarification is required on this point.
- Discouraging the use of private car – Stroud is a predominantly rural district with a series of urban areas. Whilst development adjacent to the larger urban areas offers considerable benefits for minimising the need to travel by private car, it remains to be seen how all new developments would be expected to discourage the use of the private car. Such terminology represents an active approach in terms of discouraging the use of the private car and how it would be secured via planning. Furthermore, it is not clear how such an approach would impact on the social and economic wellbeing of future residents of the District. If the Plan wishes to maintain such an approach, further development adjacent to established settlements is critical.



- Terra support the use and provision of green infrastructure. However, it is not clear as to how all new developments are expected to support “local food production”. There are no prescribed standards in national guidance or in the Local Plan, as to what is expected. Furthermore, there may be instances where the provision of green infrastructure/supporting local food consumption maybe incompatible with the need to sequestration carbon.

## **Core Policy CP2 - Strategic Growth and Development Locations**

2.10. In conjunction with other submissions, Terra is concerned that the provision of at least 12,800 new dwellings in the District is unsound in that the target does not reflect national guidance regarding the minimum housing figure proposed in the Standard Method. In addition, out of the policy, Terra wishes to set out its concerns on the following allocations.

- Cam North-West – 700 units.
- Sharpness Docks – 300 units.
- Sharpness – 2,400 units.
- Wisloe – 1,500 units.

2.11. This equates to 4,900 units to be constructed on significant urban extensions. Terra’s concerns with the provision of 4,900 units on 4 urban extension sites are that:

- These are situated within 5 miles of each other.
- There is insufficient evidence presented supporting the ability of the local housing market to absorb the magnitude of development which is being proposed.

2.12. Therefore, there is a question as to whether the Plan is “effective” in that there is no evidence of a delivery timetable for each site, apart from Table 6 on page 306 of the Plan. If there is any delay in the delivery of these sites this will lead to questions about the overall deliverability of the allocations being provided with the attending concerns on the District not being able to demonstrate a 5-Year Housing Land Supply. Furthermore, the Plan’s approach is highly inflexible if there is any failure or delay in the delivery of Wisloe or Sharpness, by way of example. There is no alternative allocation strategy in the Plan to ensure that other sites can come forward of significant magnitude to make up the shortfall in any supply that may occur during the period whilst these strategic sites come on stream.



- 2.13. A solution to this difficulty is to increase the flexibility on the other allocations being put forward in the Plan, with reference to Terra 's interests at Cam, the site could deliver circa 180 dwellings, providing a site that can deliver within a 5-year timeframe and reduce the Council's dependency on larger strategic sites.
- 2.14. A further concern with the Policy is the distinction between Strategic and Local Development sites.
- 2.15. Paragraphs 20 to 23 of the NPPF deal with strategic policies, principally such policies set out the overall pattern, scale and quality and quantity of development. In addition, they should look forward 15 years.
- 2.16. In the case of strategic development sites, it is clear that there are several allocations in the Plan which will take 15 years to deliver (e.g. Sharpness and South of Hardwicke). However, in the case of PS25, the rationale for this being a strategic site is unclear and un evidenced. It is notable that at 180 dwellings, it is the smallest of the strategic allocations in the plan by at least 120 dwellings and that the two Local Development Sites in Berkley equate to 170 dwellings in any event.
- 2.17. As a result, the reference to PS25 as a Strategic Development Site should be removed and aligned to a Local Development Site level, or the difference removed from the Plan completely.

### **Core Policy CP3**

- 2.18. Terra support the Policy's position that Cam is a Tier 1 settlement, and it is the Council's primary focus for jobs and development.

### **Core Policy CP4**

- 2.19. Terra support the overall objectives of the Place Making policy. However, any reliance on Supplementary Planning Documents or Design Statements will have to be subject to proper scrutiny to ensure that the controls imposed through those documents meet the requirements of national guidance.
- 2.20. Turning to the master planning and development of sites, the requirements within paragraph 2 of the policy are supported. However, it must be recognised that they are competing influences on the design of sites.



### **Core Policy CP5**

- 2.21. There is a need to ensure that these standards do not apply to smaller development sites.

### **Core Policy CP6**

- 2.22. In responding to the Policy, there is a need to ensure that the requirements of the paragraphs 34 and 56 of the Framework have been met. These paragraphs govern developer contributions, and the Policy refers to the Infrastructure Delivery Plan.

- 2.23. The need for new infrastructure demands being generated by new development is well understood. However, in seeking contributions towards infrastructure arising from development, there is a need to ensure that they are:

- Necessary
- Directly Related to the Development
- Fairly and reasonably related in scale and kind

- 2.24. The concern with the IDP is that it sets out multiple infrastructure requirements and is a document which will be “reviewed and updated as circumstances change” (para 2.9.30). The challenge with this document, being outside of the planning process, is that it could lead to infrastructure requirements being demanded from development which do not meet the tests set out above or makes the development unviable. Already, the Viability Assessment has highlighted concerns with the overall viability of Allocation PS25. In addition, developer contributions cannot be used to seek contributions to address existing deficiencies infrastructure, but rather only be required to address the impacts arising from the development itself.

- 2.25. In terms of the viability issue, the costs in the IDP for PS25 are scheduled as follows

- Pre-School £814914
- Primary School £1113716
- Secondary School £831312
- Post 16 £457,222
- Healthcare £148,050
- Dentist £48,116





- Acute Care £66,623
- Allotments 33,074
- Orchards £12,842
- Amenity Space £34,246
- Parks £471,763
- Play space £42,831
- Accessible Green Infrastructure £85,615
- Designated Sites Contribution £69,300
- Sports Facilities (AGP/Halls/Swimming Pool) £163,036
- Community Centre £102,313
- Libraries £54,565
- Police (including buildings) £57,189

2.26. This equates to a S106 package of £4,606,727 (£25,592 per dwelling based on 180 dwellings) as a minimum and **excludes** any contributions to off-site highways infrastructure. This is a significant cost per unit and, there is the concern that the Plan could impose such a level of contributions rendering the site unviable.

2.27. The concluding remarks of the IDP is that it should inform the preparation of an Infrastructure Funding Statement so that the shortfalls in funding can be identified and how developer contributions will assist in dealing with those shortfalls. Further concerns are highlighted in the HDH Viability Assessment, which states at paragraph 12.73:

*"Even on this basis, not all development is viable, particularly that on brownfield sites. In these cases it is recommended that the Council accepts site-specific viability assessments at the development management stage."*

2.28. It goes on to conclude at paragraph 12.90

*"In relation to the Strategic Sites, we reiterate our earlier comments. There is no doubt that the delivery of any large site is challenging so, rather than draw firm conclusions at this stage, it is recommended that the Council engages with the owners in line with the advice set out in the Harman Guidance and the PPG."*

2.29. It is essential that the policy is revised to clarify the role of the IDP in the determination of S106 requirements and how those contributions are justified by the CIL 122 tests.



### **Core Policy CP8**

- 2.30. Paragraph 31 of the Framework requires that plans should be “underpinned by relevant and up-to-date evidence”, it goes onto require that policies should take account of “market signals”.
- 2.31. In response, the use of a housing assessment is useful in informing housing mix. The concern with the use of such documents is how quickly they age and cease to be relevant. A further complication is if any Parish profile suggests an alternative mix of units, as a result, it is recommended that additional flexibility is inserted into the policy that allows for proposals to “broadly reflect” the housing mix in the needs assessment and allows for the use of market data to ensure viability.
- 2.32. In terms of criteria 1-5 of the policy these are considered unnecessary because they are covered in other policies.

### **Core Policy CP9**

- 2.33. The approach in the Policy is unsound in that the Plan identifies an annual unadjusted affordable housing need, which is more than 50% of the Plan’s housing target. Therefore, the Policy cannot deliver enough affordable housing and fails to assist in “significantly boosting the supply of homes” as required by paragraph 59 of the Framework.
- 2.34. This places extra pressure on the Plan to deliver additional housing. In this instance, it provides further evidence for supporting the release of Terra ’s site at Cam.

### **Delivery Policy HC3**

- 2.35. The requirement in the Plan on all strategic allocations to deliver 2% of the total number of dwellings proposed as self-build or custom build units is considered unsound because it is not considered to be a deliverable requirement. The allocations in the Local Plan set out a series of competing requirements which mean that opportunities for self-build are extremely limited and present more logistical challenges for a developer in terms of:
- Where those self-build plots will be located, meeting market expectations.
  - Timetable for delivery of plots.
  - Land availability.



- 2.36. Other concerns relate to the design of self-build, relative to the principles set out in a wider masterplan and Design and Access Statement for any allocation. With such stringent requirements in the Plan, there are concerns about the deliverability of this.

### **Delivery Policy HC1**

- 2.37. Terra objects to the policy because part 4 of the Policy refers to the loss of damage to any open space or PROW which is important to the character of the settlement.
- 2.38. The concern here is that the Policy is too broadly defined and could allow decisions to be made to reject allocations on the basis that open space/PROW is considered too “important” to the character of the settlement. In addition, where is the evidence base in the Plan to ensure that allocations affected by PROWs are protected against conflicts with this part of the Policy.
- 2.39. Furthermore, if there is an important open space, this should be protected/recognised through the Council’s Green Infrastructure, Sport and Recreation Study, referred to in Policy DHC6.

### **Delivery Policy DHC5**

- 2.40. This policy requires Health Impact Assessments to be provided with all strategic development sites. Terra is concerned about such a requirement for the following reasons:
- What is the HIA process, if this is to be a policy requirement, why is it not specified in the Plan.
  - The role of the PPG on health outlines basic planning concepts which promote healthy communities. The need for a separate assessment is considered unnecessary.
  - The relevance of food production and community orchards in the delivery of strategic housing sites.
- 2.41. What constitutes ‘demonstrable adverse impact’ what are the criteria against which the Council will seek mitigation and how will this be secured.

### **Delivery Policy DHC7**

- 2.42. Terra objects to the policy because it is not consistent with national guidance. The policy requires 3.92 ha of open space per 1000 population. Paragraph 96 requires that



policies should be based on robust and up-to-date assessments of the need for facilities. Those assessments should then be used to determine what are the open space requirements arising from development.

- 2.43. As the Policy sets out an open space and sport requirement based in part on historic standards (e.g., Fields in Trust) or seeks to apply standards, there are no nationally recognised standards (e.g., orchards). In seeking to set out a typology of recreation contributions, the concern is that the Policy will be used to secure contributions towards open space/recreation facilities in locations which are not relevant to the proposals.
- 2.44. In addition, the reliance on supplementary planning document is unhelpful as it could introduce additional requirements to the Policy.

### **Core Policy CP14**

- 2.45. Terra are concerned with the Policy as drafted; in that it reiterates several requirements which are equally covered by other policies in the Plan as well as in national guidance. This repetition conflicts with the need for 'succinct' plans in paragraph 15 of the Framework.
- 2.46. It is equally not clear in the Policy as to whether the requirements are mandatory or whether a balanced judgement can be reached in terms of their compliance within the Policy as well as how they relate to other policies.
- 2.47. Further repetition to allotment/community orchards provision in major development is not necessary and should be removed.

### **Delivery Policy ES1**

- 2.48. The policy sets out unnecessary repetition of Zero Carbon objectives which have been set out elsewhere in the Plan and is considered unsound because it is contrary to national guidance.
- 2.49. Terra 's position is supported by The Written Ministerial Statement of 25 March 2015 is clear that, from the date of the Deregulation Bill 2015 receiving Royal Assent, *"local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings."*



2.50. Whilst Terra is keen to stress that it agrees with the general thrust of the Council's objectives, the requirements of the policy are incompatible with the Government led approach in that it introduces effectively local standards, for example:

- In terms of achieving Zero Carbon, this standard has yet to be formally set by the Government and over the lifetime of the Plan, it would be reasonable to conclude that Building Regulations will move at a faster pace than Plan standards.
- The reference to a Carbon Offset Fund run by the Council is concerning. The policy fails to explain how this is relevant to proposals and meets the tests in the Framework. Equally there is no explanation as to how "residual emissions" will be assessed.
- Use of the Home Quality Mark – this is not a Government approved standard and should be removed from the Plan.

### **Delivery Policy DES3**

2.51. Terra objects to the Policy in seeking to ensure that developments are future proofed when it comes to local heat networks being provided in the future. The move away from gas boilers in 2025 means that developers will already be considering the need for heat generation in new homes.

2.52. If the policy was applied to allocation PS25, on the face of it, it would place an unnecessary burden on the site, given that the allocation to the north has not been designed to that standard.

### **Delivery Policy ES3**

2.53. The concern with this policy is that it is too broad in the matters which it covers and could be used to oppose housing allocations as it is subjective.

2.54. In terms of loss of healthy soils, or best and most versatile agricultural land, what level of loss is unacceptable? How does this balance against the housing requirements of the Plan and need for affordable housing? Finally, the approach is contrary to the NPPF, which requires that the loss of such land is only considered.

### **Delivery Policy ES6**

2.55. The Environment Bill has yet to receive Royal Ascent and it is not clear from the evidence base as to whether biodiversity net gain has been properly considered in the



allocations the Council has made. Furthermore, the Policy is unclear as to what will be the assessment method for calculating net gain, as required by the Policy.

- 2.56. A further concern is at paragraph 6.53 where it sets out that net gain should be achieved on sites where possible. In instances where this is not achievable, off-site measures are identified, but there are no mechanisms in place. Further policy guidance is essential to understand how this can be achieved.

### **Delivery Policy ES8**

- 2.57. The concern with this policy is how the “unacceptable loss” of a tree/hedgerow is considered in the overall planning balance. The test appears to apply to all trees (irrespective of whether they are protected by a Tree Preservation Order or not). There may be instances on development sites that such loss is unavoidable because of other competing technical requirements.

### **Delivery Policy ES10**

- 2.58. There is a need for the policy to better align with the NPPF. Part 5 of the Policy refers to any harm or loss to any heritage interest. This ignores the guidance in paragraph 193 of the NPPF (relating to designated heritage assets) and paragraph 197 (dealing with non-designated heritage assets). Part 5 of the policy is too broad and could encompass both designated and non-designated interests.

### **Delivery Policy ES12**

- 2.59. Terra question the need for the Policy, given that it repeats several points raised in other policies.

### **Delivery Policy ES16**

- 2.60. The policy is unsound as it does not provide a framework for determining exactly how public art contributions are calculated and what is considered ‘proportionate’.



## 3.0 Commentary of Local Plan Allocations

- 3.1. Whilst Terra broadly support the Plan in allocating land at Cam for development, it does have reservations about the allocations in the Plan and their overall deliverability. This, in part supports Terra's case for seeking modifications to allocation PS25 . These are considered as follows:

### **PS01 Brimscombe Mill**

- 3.2. The continued allocation of Brimscombe Mill for 40 residential units. This site has been allocated for development for some significant time (Site SA1d in 2015 Local Plan) and it is considered that this site remains undeliverable because of land ownership and drainage concerns.

### **PS02 - Brimscombe Port**

- 3.3. The continued allocation of Brimscombe Port for 150 dwellings and canal related tourism development is unsound. The site was subject to a planning application in the past 10 years for mixed-use development in 2011 (S.11/0799/OUT) for a mixed-use development of 234 dwellings. However, this was not determined (according to the planning register). It is understood that there are significant infrastructure costs in terms of the provision of a new canal link servicing the site and a need to access and acquire third party land. It has not been possible for this site to be delivered. The Plan offers no convincing evidence about the overall viability of the proposal. Currently, the site is in an active economic use, and it is considered that the long-term aspirations of the Plan to deliver this site are simply unrealistic.

### **PS36 - Sharpness Garden Village**

- 3.4. The Plan's treatment of the garden village is unsound, when based on the assumptions made in terms of the site delivering 2,400 houses within the Plan period. Terra 's interests in Cam will not address any strategic shortfall arising from a delay in the delivery of Sharpness and Terra is not looking for the site to be removed from the Local Plan. However, there is a need for realism in the delivery of the allocation and what the consequences of this will mean for short-term housing land supply in the District and the need for smaller development sites to be delivered quickly and make best use of land.



- 3.5. PS36 is a vision for a new garden community of 2,400 dwellings and 10 ha of employment land. This will result in a population of circa 5,700 assuming an average size of 2.4 persons per dwelling.
- 3.6. In creating a new community, both the Plan and the promoter's material is keen to emphasise the self-containment of the development and the need to minimise the need to travel by private car. Much emphasis in the Policy, is given to the provision of a new Railway Station and service. However, in contrast, there is no such explicit commitment in the promotion material for a railway being provided as part of the first phase of development (i.e., before 2040). In addition, there is no evidence provided in any available documentation that a new station and railway service will be provided and when that will happen. This brings into doubt the deliverability of the Garden Village as proposed.
- 3.7. Terra have another concern in terms of the timetable for delivery of the allocation. For the site to be delivered, the adoption of the Local Plan will be critical. This would be towards the end of 2022, assuming a suitable EiP period.
- 3.8. Table 6 of the Plan (p306) assumes that the site will be delivering 500 units in the period 2025 to 2030. This is unrealistic for the following reasons:
- Once adopted, outline application is submitted with E.I.A. Outline Planning Permission follows with a S106 Agreement.
  - In terms of delivery, publicly available research from Litchfields, concludes that sites more than 2,000 units take six to seven years to deliver. This means that it will not deliver first dwellings until 2028/2029 at the earliest.
  - Matters could be further delayed by infrastructure requirements and the need/time taken to sell parts of the site to third party developers.
  - Even if delivery commenced in 2029, this would necessitate in a build out rate of 218 dwellings per annum for the next 11 years for the site to deliver 2040.
  - The site represents approximately 1/3 of the annual housing target for the District. The lack of a detailed trajectory for delivery means that Terra is unconvinced about the robustness of the evidence base supporting the allocation and the deliverability of the Plan as a whole.
- 3.9. This then underlines the need for other allocations to be intensified to make up the shortfall in the delivery of this allocation.





### **PS37 - New Settlement at Wisloe**

- 3.10. As with PS36, Terra is concerned that the allocation is unsound, given questions marks regarding the robustness of the evidence base for delivering the site. The evidence base for the site is not as complete as it is for Sharpness.
- 3.11. The Plan assumes that the site will be a “carbon neutral” development by 2030. As set out above, even if the Plan was adopted in 2022, there would be six-year lead in before the first houses were delivered. It is simply not possible for the Plan to deliver significant number of units by the 2025-2030 period. In addition, assuming a 2029 start, there is no evidence to suggest how this site can be brought forward without compromising the delivery of Sharpness, as a competitor for house purchases.



## 4.0 Site Specific Representation - PS25

- 4.1. In principle, Terra Strategic welcome the allocation at East of Cam (PS25) for housing development in the Local Plan. However, it has concerns that the allocation as proposed is **unsound**. This part of the document sets out Terra’s approach to the site and sets out concerns regarding the allocation which need rectifying to make it sound, consistent with national guidance.
- 4.2. This Section of the Representation document is structured to deal with:
  - Allocation Specific Concerns
  - The Technical Case for the Revised Allocation
- 4.3. Each is addressed in turn below.

### **Allocation-Specific Concerns**

- 4.4. As set out above, Terra’s position is that the allocation is unsound, for the following detailed reasons.

### ***Deliverability***

- 4.5. Paragraphs 16a and 74 of the NPPF set out the need for plans to be deliverable and maintain a supply of housing sites. As drafted, the policy sees the site as being an extension to the NE Cam Urban extension and it requires an integrated and co-ordinated delivery of development. However, in light of the NPPF references, the approach of this policy on the basic premise of deliverability is flawed. Currently, the NE Cam Urban Extension is not yet fully resolved in planning terms as the site has yet to be delivered and all the Reserve Matters and Pre-Commencement conditions for the site to be discharged in totality.
- 4.6. Table 6 of the Plan shows the allocation being delivered over the period 2025/2030 (50 units) and 2030/2035 (130 units). Given the need to maintain a 5 year housing land supply and the concerns highlighted in the previous section, the artificial delay of delivering the site is considered unnecessary and contrary to the NPPF.
- 4.7. As a result, the Policy places an impediment on the deliverability of this site, with the NE Cam extension preventing the early delivery of PS25. The need to limit the



deliverability of PS25 to the completion of the NE Cam site is unnecessary. Sufficient safeguards exist in other planning policies and professional best practice to ensure that this site will be delivered in an integrated manner.

- 4.8. To ensure the deliverability of this site, it will require an independent access point to be provided. As part of this submission, a master planning exercise has concluded that there are opportunities to provide an independent access point to the south. The allocation should be adjusted to reflect this fact.

### ***Biodiversity Net Gain & Open Space Provision***

- 4.9. Criterion 2 of the Policy requires open space and biodiversity net gain provision in accordance with other policies. At this stage, Terra consider that the evidence to support this requirement in the policy has not been tested and there are uncertainties on the deliverability of the allocation as proposed in the Plan.
- 4.10. In terms of biodiversity net gain, there is no supporting evidence in the Plan to quantify how this will work in respect of the site and what mechanisms will be in place if it is not possible to provide on-site.
- 4.11. Whilst the Plan does not set out the overall site area, it has been calculated to be 8 ha in size. Based on an allocation of 180 dwellings, and a resident population of 423 people (see assumptions made in the IDP), the development would generate a requirement of 1.69ha of open space as required by Policy DHC7. It is not clear from the Plan that this can be accommodated without the requirement for additional areas of land being allocated for development to meet other policy objectives.

### ***Developer Contributions***

- 4.12. In light of other representations submitted, what is the evidence base for demonstrating what these contributions are and how those contributions meet CIL Regulation 122 tests.
- 4.13. As with the general deliverability point set out above, the need to meet these requirements necessitates the increase in the size of the overall allocation. This is dealt with below.

### **The Technical Case for the Revised Allocation**

- 4.14. This submission is supported by a series of Technical Notes and a Masterplan. There now follows a short overview of the Technical Notes:



### ***Highways - see CTP Technical Note***

- 4.15. This submission is accompanied by a Highways Technical Note prepared by CTP. This shows how the site can be accessed via the Upthorpe road, to facilitate independent access and remove the reliance on the adjacent site coming forward in due course. The access points proposed have been tested for visibility and an understanding of the prevailing traffic conditions, through the use of an ATC survey. In terms of junction capacity, the Note has tested up to 250 homes and concludes that the highway network can support such a level of development. The Note concludes that a safe and suitable access into the site via the Upthorpe road is achievable in accordance with paragraph 108 of the NPPF.

### ***Landscape - see Incola Document***

- 4.16. The site is not subject to any national or local level landscape designation. Incola has been appointed to advise on landscape a development. It considers that the current allocation does not follow existing field edge patterns and the result form of development would not 'fit' with the existing structure and character of the landscape.
- 4.17. In terms of the extent of the potential development, the initial analysis undertaken shows that development of up to 10 metres in height can be accommodated up to the 55 metre contour. This expands the potential of the site to deliver a more considered masterplan, rather than as proposed by the allocation.

### ***Drainage - See Abley Letchford Partnership documents***

- 4.18. The FRA Note shows that the site is within Flood Zone 1, but there are very limited parts of the site, where it abuts the River Cam that are within Flood Zones 2 and 3. These areas are wholly unaffected by the site's development.
- 4.19. Turning to the use of SuDS, measures will be employed which control the surface water runoff to greenfield rates. Paragraph 5.13 of the document sets out the various components available for attenuation surface water runoff.
- 4.20. In respect of foul sewage, it is expected that this will be a gravity system and. Discussions with STW will confirm treatment/network capacity.



### ***Ecology - See Preliminary Ecology Appraisal by Harris Lamb***

- 4.21. The site has been subject to a desk-based assessment and extended Phase 1 Habitat Survey. This demonstrates that the site is capable of supporting various species. However, as detailed in Table 3 of the Document, there are design considerations and mitigation measures proposed which can address any impacts arising.
- 4.22. Turning to Biodiversity Net Gain, the attached masterplan shows how BNG could be delivered to the DEFRA beta 2 Metric Calculator, across the extent of the Terra Strategic land.

### ***Utilities***

- 4.23. The attached Utilities Statement shows that the site has the potential to connect to all the main utilities.
- 4.24. All of these demonstrate how the site can be developed and their collective findings have been incorporated into an initial concept masterplan. This marks the first stage of Terra's approach to the allocation and, setting out an initial working vision for the site which is deliverable.

### **Changes Sought**

- Redline allocation boundary amended, allowing creation of access onto the Upthorpe road.
- Allocation extent increased to allow for BNG and POS to be properly considered in the master planning of the site.



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