



EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

MATTER 6c:

Stonehouse cluster site allocations

On behalf of: Robert Hitchins Ltd

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Author: Sarah Hamilton-Foyn



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Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 6c, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1 Compliance with statutory procedures
- Matter 2 Spatial Strategy and site selection methodology
- Matter 3 Housing Need and requirement
- Matter 5 New Settlements at Sharpness and Wisloe
- Matter 6a General Questions
- Matter 6d Cam and Dursley
- Matter 6g The Severn Vale Allocations
- Matter 7 Housing Provision
 - Matter 7a
 - Matter 7b
 - Matter 7c
- Matter 8 Employment Provision
- Matter 10 Environment
 - Matter 10a
 - Matter 10c
 - Matter 10d
- Matter 11 Infrastructure Provision and Viability
 - Matter 11a
 - Matter 11b
 - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



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6. SITE ALLOCATIONS – GENERAL QUESTIONS

6.1 Matter 6c – Stonehouse cluster site allocations

Local Sites Allocation Policy PS42 Land off Dozule Close, Leonard Stanley

26. The site is allocated for up to 15 dwellings and associated open space uses.
- The policy seeks the retention of the majority of the southern part of the site in open space use and the conservation of existing hedgerows and trees. Are these requirements justified and sufficiently clear to a developer or decision-maker?
 - The supporting text states that development should be focused on the northern part of the site with access from Dozule Close. Is this justified and should this be clearly set out within the policy?
 - The supporting text also references the provision of new footpath and cycle links. Is this justified and if so, should it be clearly set out within the policy?

26.1 No comments.

Local Sites Allocation Policy PS16 South of Leonard School Stanley Primary School

27. The site is allocated for up to 25 dwellings and associated open space uses.
- The policy seeks the conservation of existing hedgerows and trees adjacent to Bath Road. Is this justified and achievable?
 - The supporting text references the provision of new footpath and cycle links. Is this justified and if so, should it be clearly set out within the policy?

27.1 No comments

Local Sites Allocation Policy PS17 Magpies site, Oldends Lane, Stanley

28. The site is allocated for up to 10 dwellings, a new community building with car parking and landscaping.
- The policy requires the safeguarding of land to allow for a future pedestrian bridge across the railway line at Oldends Lane.
 - Is the bridge required and if so what progress has been made on securing it?
 - Is suitable land available to the west of the railway line for the bridge? If not, how will the bridge be delivered?
 - What is the timescale for the delivery of the bridge and is funding in place for its construction?
 - Overall is the bridge feasible and is the safeguarding of land justified?
 - Is the policy clear on what landscaping would be required or is this covered by other Plan policies?

- c. **Has an appropriate delivery timeframe for the development of the site been identified in the housing trajectory and is this realistic, particularly taking into account the requirement for a new community building? Is the housing provision tied in with the delivery of the community building?**

28.1 No comments.

Strategic Site Allocation Policy PS19a Stonehouse North West

29. **The site is an extension to Stonehouse at Great Oldbury. It is allocated as a mixed use development including approximately 700 dwellings, 8 plots for travelling showpeople uses, approximately 5 ha for defined employment uses and the provision of or contributions to community facilities. The policy seeks a development brief incorporating an indicative masterplan, that will address 21 listed requirements.**

- a. **Are all the 21 criteria, which list a varied range of requirements, justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?**

29.1 The allocation is supported; however as set out in our representations we have number of detailed comments/objections to the wording of the criteria in the Policy to ensure that they are effective and capable of being implemented. We have proposed modifications to some of the 21 criteria in response to the Reg 19 Local Plan consultation in July 2021 which has not been included in the summary of the representations SLP-01a.

29.2 We set out in our representations that a planning was being prepared in parallel with Local Plan so that it can be submitted as soon as possible and development can take place in order to support the delivery of housing in a timely manner which is consistent with the NPPF and boosting the supply of land for housing. It is considered that the preparation of a development brief including an indicative masterplan to be approved by the Council is an unnecessary requirement and will in fact delay the delivery of housing and undermine the housing trajectory. Indeed, since the Reg 19 Plan was prepared nearly two years ago no such work has been undertaken by the Council, but at the same time the applicant has consulted and is at an advanced stage in the preparing the application.

29.3 In our representations we proposed wording to replace paragraph 2 of the policy.

29.4 We have also set out detailed comments in respect of Additional Technical Evidence consultation in October 2022:

- EB98 Traffic Forecasting Report Addendum,
- EB108 Sustainable Transport Strategy Addendum (July 2022),
- EB109 Transport Funding and Delivery Plan (July 2022)
- EB110 Infrastructure Delivery Plan (IDP) Addendum Report (August 2022)
- EB111 Stroud Local Plan Viability Assessment 2022 Refresh Report (August 2022)
- EB111a Stroud Local Plan Viability Assessment 2022 Refresh Appendices 1-11

- EB111b Stroud Local Plan Viability Assessment 2022 Refresh Appendices 12–18
- EB112 SALA Accessibility Scoring Note (August 2022)
- EB112a SALA Transport Accessibility Assessment November 2020
- EB112b SALA Transport Accessibility Assessment October 2019
- EB112c SALA Transport Accessibility Assessment July 2018

29.5 At the time of writing a Statement of Common Ground is being prepared.

b. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

- 29.6 The necessary infrastructure improvements and requirements are not justified neither are they set out in policy. Our objections are set out in response to **EB98** in summary, The updated traffic modelling reflecting the revised allocations has not accounted for the additional interventions set out in the STS Addendum; the identified highway mitigation needs to have more scrutiny as a number of the schemes don't appear to be necessary based on the modelling results. It would be beneficial to have more detail of the more major mitigation schemes, notably at M5 J12 & M5 J14, as the delivery of these will be key in delivering Local Plan growth. The updated modelling has shown that the additional development at Javelin Park will put further pressure on the operation of the highway network at M5 J12 for which further mitigation is likely.
- 29.7 The FDP has confirmed that the updated traffic modelling has shown that PS19a NW Stonehouse has little impact on the key strategic infrastructure comprising the mitigation packages; and that the allocation is not required to contribute to their funding. Our detailed comments are set out in response to **EB109** and **EB110**.
- 29.8 As set out in previous representations, the available evidence demonstrates that there is no need for a primary school to be provided at Land North West of Stonehouse given the significant available capacity in nearby schools.
- 29.9 Nevertheless, the IDP identifies that the County Council expect that a new primary school will need to be provided on site. The need or otherwise for such a school will be determined by the forecast capacity in nearby schools at the time planning permission is granted. These cannot be pre-empted at the current time and as such there is at least a prospect that no such primary school will be required to be provided on this site. As such, the policy requirement for such a school is not justified and the policy wording should be amended to require the provision of this school only if it is demonstrated to be required at the time of the determination of a planning application.

c. Do any policy requirements duplicate other Plan policies and if so, why?

d. As regards the provision of 8 plots for travelling showpeople uses:

- i. Have discussions with the travelling showpeople community taken place to assess both the suitability of the overall location and the site?
 - ii. Are some areas within the site considered more suitable for this use than others? For instance, can easy and separate access to the local highway network be achieved?
 - iii. Each plot will typically need to include space for caravan accommodation and for the storage and maintenance of rides, and other vehicles and equipment. Has the extent of the land area required for the proposed 8 plots been determined and can this be easily accommodated within the proposed development?
- 29.10 As we are opposed to the provision of 8 plots for travelling showpeople uses being located on the site, we have had no discussions with the travelling showpeople.
- 29.11 It appears that the need for 8 additional plots is proposed to be met on PS19a only. None of the other strategic sites are required to make any provision for travelling showpeople. There is no justification for any, let alone the entire district provision to be met at Stonehouse North West. The requirement of 8 additional plots for travelling showpeople households in Stroud District is set out in the Gypsy and Traveller Accommodation Assessment para 1.39 (2017). It must be questioned how relevant this evidence is as it is 4yrs old.
- 29.12 It is noted that in ID-03 that following the receipt of an up-to-date assessment (SLP -03) ID-03 states: ***"The District Council is now working with the Gypsy and Traveller and the Travelling Showpeople communities to identify potential additional provision, as required. It is noteworthy that the emerging Gypsy and Traveller Policy CP10 encourages the expansion or rationalisation of existing sites and this forms the basis of the work now being carried out by the District Council. It is also anticipated in 2023 that the local authorities in Gloucestershire will jointly commission work on a Gypsy and Traveller call for sites throughout the County using the latest accommodation assessment figures."*** (my emphasis)
- "It is also anticipated in 2023 that the local authorities in Gloucestershire will jointly commission work on a Gypsy and Traveller call for sites throughout the County using the latest accommodation assessment figures."***
- 29.13 It remains the case that specific requirements such as those within Policy PS19a Stonehouse North West for eight plots for travelling showpeople have not been viability tested within **EB111** in terms of the potential impact on land value, development viability and site deliverability (nor have any related costs been referred to within the **EB110**). These concerns were raised in the response submitted regarding this policy in June 2021 on behalf of Robert Hitchins Ltd as part of the Pre-Submission Draft Local Plan for Publication consultation but remain unaddressed.
- 29.14 The effect on viability, market forces and a realistic approach to delivery suggests that an inflexible approach in policy terms could result in a reduced speed of delivery or a sterilised site/part of a site crucial to the development strategy.
- 29.15 The approach needs to be consistent with the government guidance - Planning Policy for Traveller sites - there is no reference in the guidance to allocations being included on strategic sites.

- e. Paragraph 3.2.13 of the Plan refers to the need for substantial structural landscaping to protect the landscape setting of Standish, open countryside and views from the AONB. Is this effectively set out in the policy?**

29.16 An outline planning application has been prepared for part of the emerging allocation of PS19a which comprises up to 635 dwellings, a primary school, associated works, infrastructure, open space, landscaping, and access. The reference to structural landscaping is set out effectively in the policy at criteria 8. Although the application is in outline the illustrative masterplan includes allotments along the western edge and the school site. To the northern edge is proposed for an orchard which runs along the edge bordering the pitches. Parkland continues along the northern edge abutting existing vegetation. The eastern boundary is also set back and includes areas of green infrastructure and existing tree groups and hedgerows.

- f. Reference has been made within the representations to adverse impacts on the River Frome Local Wildlife Site and the Severn Estuary SPA, SAC and RAMSAR sites. Has the impact of the site allocation been suitably assessed and any necessary mitigation determined in these regards?**

29.17 The site has been assessed through the Council's site selection process.

29.18 At the time the Reg 19 version of the Local Plan was subject to consultation, Pegasus submitted representations on behalf of Robert Hitchins Ltd as it was considered that the proposed wording of the policy was not appropriate as it implied that on site mitigation was required. We suggested alternative wording: "*Consider any identified impacts in relation to the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC and to contribute to the approved SDC mitigation schemes or undertake an independent mitigation strategy as appropriate.*" In the preparation of the Draft Statement of Common Ground we have stated that the wording of the policy should be revised: "*Such financial contributions as can be justified offsite work to mitigate against the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC sites.*"

29.19 The outline application that has been prepared is subject to an Environmental Statement. The Illustrative Masterplan, shows how the development might be laid out to respond to constraints and opportunities on the site, including those identified in the technical reports submitted as part of the planning application and the supporting Environment Statement.

Strategic Site Allocation Policy PS20 Stonehouse – Eco Park M5 Junction 13

30. This site is allocated for a strategic mixed-use development, to include employment, a sports stadium, sports pitches, a 70 bed care village, a hotel and canal and open space uses. The policy seeks a development brief incorporating an indicative masterplan, that will address 20 listed requirements.

- a. The County Council representation highlights that part of the site allocation falls within designated Mineral Safeguarding Areas (MSAs) and that no reference is made**

to this within the policy or supporting text. This issue is acknowledged in the relevant Statement of Common Ground. What extent of the site is within the MSAs and what implications does this have for the allocation and the policy overall?

- b. The supporting text states that the site is 42 ha in size. Approximately 10 ha of land for business uses are defined under criterion 2. How has this been determined and is it justified? Do the other proposed uses add up to the remaining 32 ha and are they justified?
- c. What is meant by a 'care village' and is this robustly justified in this location? Is the size of the facility (70 bed) based on need and is it viable?
- d. As regards the Industrial Heritage Conservation Area (IHCA):
 - i. Paragraph 3.2.21 implies that part of the development proposals would be located within the IHCA. Is this the case?
 - ii. Is the canal cut and towpath etc located within the site?
 - iii. Criterion 9 implies that there will be harm to the IHCA from the development of the site, as the wording seeks less than substantial harm. Is this approach consistent with national policy and legislation, particularly as regards the desirability of preserving or enhancing the character or appearance of a conservation area? Is the approach justified?
- e. Are there particular reasons as to why certain facilities, such as the sports stadium and care village, are to be located in specific areas of the site? Does this overly restrict the development brief process?
- f. What progress has been made on the re-opening of Stonehouse Bristol Road rail station, what are the timescales for its delivery and is it feasible? Is criterion 15 justified?
- g. Overall, are all the policy requirements justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?
- h. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?
- i. Do any policy requirements duplicate other Plan policies and if so, why is this necessary?

30.1 No comments.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Cirencester

Pegasus House, Querns Business Centre,
Whitworth Road, Cirencester, GL7 1RT
T 01285 641717
E Cirencester@pegasusgroup.co.uk
Offices throughout the UK & Ireland

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