

Stroud Local Plan

Examination in Public

Matter 6e – Gloucester’s Rural Fringe Site Allocations

Hearing Statement by Savills on behalf of L&Q Estates

February 2023



Strategic Site Allocation Policy G2 Land at Whaddon

6.40a If this is proposed as a safeguarded site and a decision on whether it would be allocated for development would be made through a future review of the Plan, why is it necessary at this stage to set out specific requirements for the site?

a. For the reasons explained in our Statements to Matters 2 and 3, we consider the Whaddon site represents a substantially more sustainable, viable and deliverable location for strategic scale development than the land at Sharpness. On that basis we do not consider that the land should be ‘safeguarded’ but instead should be allocated for development in the place of the Sharpness in order to meet the needs of Stroud District. If further land is required to meet the needs of Gloucester then it is the next more sustainable location within Stroud which should be ‘safeguarded’ to meet that purpose. For that reason a detailed allocation policy is required.

6.40b Are all the 22 listed requirements justified by up to date robust evidence and are they sufficiently clear and effective in their level of detail? Do any duplicate other Plan policies and if so, why?

a. On pages 21-26 of our representations to the SLP (May 2021) we comment upon each of the 22 proposed requirements of the policy. We do not repeat these comments in full within this Statement but refer the Inspectors back to our commentary within the representations.

b. In addition, since submission of our representations the Government has moved forward with its planning reforms. These include Clauses 83 and 84 (as introduced to the Commons) of the Levelling Up and Regeneration Bill which propose the creation of National Development Management Policies (NDMP). Whilst it will be a little while after the passage of the Bill through parliament before the Government move on to produce the NDMP this is likely to occur shortly after the Local Plan is adopted. Once in place the NDMP “*would take precedence where there is conflict between them and development plan policies when making a decision on a planning application*”¹.

¹ ‘Levelling-up and Regeneration Bill: reforms to national planning policy’ Published 22 December 2022

- c. Why is that relevant to this question? In light of this it becomes even more important for policies which allocate land for development in the Stroud Local Plan to avoid duplicating the generic development management policies of the Local Plan. Those generic development management policies are likely to become redundant once the NDMP are introduced and if elements are duplicated and interwoven throughout the allocation policies of the Local Plan it will be more complicated and confusing for users of the plan to determine which aspects of a policy have been effectively replaced by the NDMP.
- d. For these reasons and notwithstanding the comments made in our representations to the SLP (May 2021) we consider that the following components of the policy should be deleted:

Bullet Point	Reasoning
6	The mitigation of impacts upon the Severn Estuary SPA/SAC/Ramsar and the Cotswold Beechwoods SAC site is a requirement of Policy ES6 and therefore covered elsewhere.
9	The management and disposal of surface water is covered by Policy ES4. There is nothing specific about the requirements of this development which need to be specified in the policy.
10	The disposal of wastewater is addressed in Policy ES4. The connection of development to a foul sewer is also covered by separate legislation and building regulations.
11	This bullet point adds nothing to the wording of Policy ES7 on Landscape Character and the protection of heritage assets in Policy ES10.
12	It is good urban design practice to prioritise walking, cycling and public transport over the use of the private car in new developments and this should therefore be common to all allocations. This bullet point and much more is covered in Policy EI12.
18	The installation of EV Charging points for new developments has been introduced into Building Regulations. A separate, specific requirement is not therefore needed.

19	Behavioural management and modal shift are matters that are covered by Policy EI12.
20	We have no particular objection to this bullet point but it seems unnecessary to determine the location of the primary vehicular access points to the site. Furthermore, these are indicated on the Map supporting Policy G2. This bullet point could be deleted without impacting upon the preparation or determination of future planning applications.
21	The planning application process will determine the required supporting infrastructure to be delivered alongside the development. As we have recommended in our representations, the reference to the IDP should therefore be moved to the explanatory text.

6.40c Have all site constraints and development impacts been robustly assessed, particularly as regards highways and opportunities for sustainable modes of transport?

- a. Yes, there is a thorough understanding of the constraints and opportunities impacting the site and a good deal of certainty that the proposed scale of development is achievable.
- b. The site is controlled by three separate parties – L&Q Estates, Taylor Wimpey and Newland Homes. The parties have been collaborating on matters which have an allocation-wide impact such as transport and also developing their own evidence base to cover the land within their individual areas of control.
- c. Taylor Wimpey is the furthest advanced with the technical work in preparation for the submission of an outline planning application. As a result, they have undertaken transport modelling to assess the impacts of development (including highways improvement works) on key junctions including the St. Barnabas Roundabout. The modelling allocation as whole including the proposed development on the land controlled by L&Q Estates and Newland Homes. The output of this assessment shows a limited increase in vehicle travel times north-south on the junction but, more importantly, significant improvements for active and public transport. Further detail is provided in the Statement submitted on behalf of Taylor Wimpey.

- d. L&Q Estates have not yet commenced preparation of a planning application however preliminary assessments across a wide range of technical and environmental areas have been undertaken. This work all supports the conclusions of the authority that the site is deliverable within environmental limits, a conclusion which is consistent with the findings of the Sustainability Appraisal and other components of the SLP evidence base.

6.40d Are necessary infrastructure requirements and mitigation measures proposed within the policy and would these ensure the development was sustainable, particularly in terms of travel modes?

- a. Subject to the comments raised above and covered in our representations to the SLP (May 2021) we are content that all the mitigation needed to make the development of the site sustainable and acceptable in planning terms has been incorporated into the draft policy wording.
- b. With regards to transport and travel, it is typically at the planning application stage where the detailed mitigation measures are determined and defined. As explained above however, the modelling work undertaken by Taylor Wimpey demonstrates not only that suitable mitigation measures are available but that these will have a positive impact on travel modes to and from the development.

6.40e Has the boundary been correctly drawn on the maps within the Plan (pages 155 and 160) and on the policies map?

- a. In so far as the L&Q Estates land ownership is concerned the boundary is drawn correctly.

6.40f Some representors raise other concerns relating to the development of the site, including the impact on wildlife, flooding and the character of the area and the recreational pressures on the AONB. Have such factors been suitably assessed as part of the process to allocate/safeguard this site?

- a. We will leave it to the Council to advise whether these factors have featured in the assessment process which led to the allocation. We can offer a good degree of comfort to the Council and

Inspectors that these concerns are not reflective of the evidence and do not indicate that the site should not be allocated for development.

- b. With regards **ecology**, a preliminary ecological appraisal of the site was undertaken in 2020. The appraisal involved a desk study and an extended phase 1 Habitat survey undertaken by an experienced surveyor on 21 August 2020.
- c. The purpose of the appraisal was to understand the constraints and opportunities pertaining to the site in order that these can be addressed at an early stage through the masterplanning process. There are in fact, limited ecological features within the site, largely due to the fact that it comprises two agricultural fields with a relatively short hedge row/fence boundary, dividing them. There are no particular habitats of note therefore within the majority of the site.
- d. The conclusion of the appraisal is that:

“The important ecological features identified within the study sites, zone of influence are not considered to pose any in principle constraint to development of the site. Furthermore, the predominantly low ecological value of the existing study site, coupled with the potential to design a sensitive master plan, that avoids, mitigates and enhances the higher value habitats and associated species interests, would ensure that any future development scheme delivers significant biodiversity gains and is implemented in accordance with national and local planning policy and wildlife legislation”.

- e. An initial **flood risk and drainage** constraints assessment was undertaken on behalf of L&Q Estates by Hydrock in July 2020. Based upon Environment Agency flood mapping, there is only a very limited part of the site, primarily along the Daniel’s Brook corridor, which falls within flood zones 2 and 3. This land will be incorporated into a substantial area of green infrastructure linked to the land controlled by Taylor Wimpey to the south. No development is therefore expected to be proposed within any land which falls outside of flood zone 1.
- f. At the present time the land controlled by L&Q Estates comprises open agricultural fields and it is inevitable therefore that a consequence of development will be a change to the **character of the area**. The same is true of all strategic development proposals allocated within the SLP.



Notwithstanding this, whilst we are not at a point at which a masterplan has been prepared for development on the L&Q Estates land, through careful consideration and sensitive design we expect a high-quality proposal to be advanced through the planning application for the site. That proposal will have due regard to the sensitivity of the location and ensure that the character of the area is preserved and enhance where possible.

- g. The final concern raised relates to the increased **recreational pressures on the AONB**. As is the case with all residential development, with new homes comes a greater concentration of residents and consequently the potential for recreational activity in protected areas. The same would be true of 300 no. 10 dwelling developments as it is of a 3,000 dwelling new community. The difference with the larger development, however, is that it is possible to incorporate on-site mitigation measures which will reduce the propensity for future residents to get in their cars and visit destinations further afield for recreational purposes. That is exactly the situation at Whaddon, where the illustrative masterplan for the allocation shows a substantial green corridor along with the Daniel Brook. This corridor will have a strategic purpose, providing suitable recreation opportunities for future residents as an alternative to protected areas elsewhere within the authority.
- h. For the reasons provided and those explained in our commentary on the Sustainability Appraisal (see Appendix A of our Statement to Matter 2), we are confident that there are no technical or environmental constraints, which should preclude the delivery of development.

6.40g The site does not form part of the housing trajectory. If the site was found to be required to meet unmet housing needs, what would be its delivery timeframe and would this be realistic?

- a. There is a proposed housing trajectory in the draft Statement of Common Ground. This trajectory is agreed amongst the three developers / promoters involved in the delivery of the site. For convenience it has been reproduced below:

Year	No. of new dwellings
April 2022 - March 2023	0
April 2023 - March 2024	0

Stroud Local Plan: Examination in Public

Hearing Statement – Matter 6e (Gloucester’s Rural Fringe Site Allocations)



April 2024 - March 2025	80
April 2025 - March 2026	200
April 2026 - March 2027	200
April 2027 - March 2028	200
April 2028 - March 2029	200
April 2029 - March 2030	200
April 2030 - March 2031	200
April 2031 - March 2032	200
April 2032 - March 2033	200
April 2033 - March 2034	200
April 2034 - March 2035	200
April 2035 – March 2036	200
April 2036 – March 2037	200
April 2037 – March 2038	200
April 2038 – March 2039	200
April 2039 – March 2040	120
April 2040 – March 2041	0
Total	3,000

Savills

1 February 2023