

BROOKTHORPE – WITH – WHADDON PARISH COUNCIL

Chair Clr. [REDACTED]

18th July 2021

Response of Brookthorpe-with-Whaddon Parish Council to the 2021 Pre- Submission Plan of Stroud District Council

1.1 The Parish Council contends that:

The Stroud Pre-Submission Local Plan fails the test of soundness because Policy G2, Land at Whaddon, has not been positively prepared, is not justified, is unlikely to be effective and is inconsistent with national policy insofar as it is unlikely to deliver sustainable development.

Policy G2 states that:

“Land at Whaddon, as identified on the policie map, is safeguarded to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. Subject to this, the site will be allocated for a strategic housing development, including residential and community uses.”

1.2 The Whaddon proposal is for a 3,000-house development. This is greater than was previously the case having apparently been changed at the last minute after a figure of 2,500 had been used in various technical assessments and for the purpose of consultation.

Positively prepared and justified?

2.1 In order to demonstrate that a local plan has been positively prepared the NPPF advises that it should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements and is consistent with the objective of achieving sustainable development. Policy G2 is clearly not based on any existing tried and tested strategy. Indeed, it accepts that it would need to be consistent with a possible future strategy arising out of the neighbouring JCS Review.

2.2 Policy G2 does not propose a relatively small level of growth. On the contrary, it paves the way for the release of a large area of greenfield land as a major strategic zone of development. The basis for doing so is to be found in the consultation response letter of the JCS dated 26th February, 2020. It identified G2 - Land at Whaddon as a possible allocation for 2,500 homes together with associated development. However, in supporting the safeguarding of the site it did so with reservations regarding the evidence base, particularly in respect of highway capacity.

It stated: "Highways evidence prepared to underpin the adopted JCS and Gloucester City Plan, showed that St Barnabas roundabout is operating beyond capacity. This remains a significant concern for Gloucester City Council in terms of highway safety. It is critical therefore, that in advance of any formal allocation, SDC and Gloucestershire Highways are comfortable that the additional traffic generated by the site on St Barnabas Roundabout, and the wider highway network, can be appropriately mitigated." See Document No. 1.

2.3 It is clear that these concerns had not been overcome at the time the draft local Plan was adopted by SDC on the 29th April, 2021.

2.4 Obviously, St Barnabas Roundabout is a major problem being already over capacity and with severe physical constraints limiting the possibility of adequate improvement. Furthermore, other local roads are not designed for existing levels of traffic and many will become rat runs.

2.5 Traffic modelling reports to support the Draft Local Plan are based on an outdated figure of 2,500 dwellings at Whaddon and do not provide sufficient level of detail necessary to demonstrate that the site is capable of accommodating strategic growth of the scale envisaged. Indeed, no comprehensive and contemporary examination of the traffic and air quality issues on the Stroud Road corridor into Gloucester and at St. Barnabas roundabout had been conducted prior to the approval of the Plan. There was therefore insufficient evidence available for a proper judgment to be made.

3.1 At the Environment Committee Meeting on the 20th April 2021 the Pre-Submission Draft Plan has the figure of 2,500 for dwellings appearing for the G2 site. This is also in the Consultation Draft dated November 2019, a letter dated the 26th February 2020 from the JCS to SDC, the Traffic Forecasting Report dated March 2021 prepared by Mott MacDonald, and the Stroud Sustainable Transport Strategy prepared by AECOM. The figure in the Draft Plan presented at the adoption meeting on the 29th April 2021, i.e. nine days after the Environment Committee Meeting, was 3,000. The Parish Council understands that a mistake had been made which would require new modelling before the Examination.

3.2 There is attached at **Document No 2** a copy email dated the 13th April 2021 from David Simmons, Principal Transport Planner for Gloucestershire County Council. This clearly states the County Council's concerns for the sustainability of emerging sites and the potential high costs of highway mitigation, the environmental impacts, the need for more detailed supporting information, and that a larger scale traffic mitigation scheme was potentially needed.

3.3 That email refers to Whaddon and St. Barnabas and the Atkins Report obtained by the County Council on the over-capacity issues at St. Barnabas roundabout which provided the improvement option proposed by the Mott MacDonald Report i.e., road widening on three arms. No consultation with adjoining land owners has been undertaken despite the obvious need to acquire land even to make limited improvements to the junction. That Report used modelling from the A417 PCF Stage 2 for the Missing Link at Birdlip which was itself based on March 2015 traffic data. The Atkins Report related to existing capacity issues and did not allow for emerging or committed housing sites in the Draft SDC Local Plan. To date SDC have only had the Mott MacDonald Report which does not consider committed sites outside the Plan area including in particular the Grange Road and Winneycroft sites.

3.4 The Mott MacDonald Report proposes highway mitigation schemes. The email from David Simmons contains the clear implication that the proposed scheme for St. Barnabas will be inadequate. The schemes for Js 12 and 14 will require £10 million + each and the Whaddon site will have the largest site near J12. **Insufficient** evidence was, and still is, available to establish whether funding for these schemes can realistically be obtained at all, never mind within the timescale envisaged by the Draft Local Plan to enable land at Whaddon to come forward.

4.1 These are issues which still require examination by the Council. The evidence on which the Plan was adopted was not contemporary or comprehensive and thus consistent with achieving sustainable development. Accordingly, it does not comply with NPPF para 31:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”

4.2 On the 12th April 2021 the Parish Council wrote to all Stroud Councillors, prior to the meeting of the 29th April 2021. A copy of that e-mail appears as **Document No 3**. This addressed the issue, among other matters, of the prematurity of the Plan with regard to the G2 site. Only three responses were received and at the Council meeting there was no debate or objection raised about the inclusion of the G2 site. In response to the email of the 12th April 2021 replies were received from Councillors Pickering, Chairman of the Environment Committee, and Lydon appearing as **Document No 4** attached, to the effect that the G2 was only being safeguarded as opposed to being allocated. This clearly demonstrates the misleading nature of the process. The comment by Councillor Lydon that a majority of councillors would vote to remove the site if it didn't risk the inspector rejecting the plan because of the duty to co-operate is indicative of the motivation for identifying the site which he describes as one of the most unpopular with councillors. Against this, Councillor Pickering told the meeting on the 29th April 2021 that the choice of sites had to be “transparent, logical, and underpinned by evidence”.

4.3 It is also of concern that the site was not discussed by members at the meeting when the Plan was adopted. This is significant in implying that members either were not made sufficiently aware of the specific issues relating to this site and/or that they were led to believe that the eventual decision would lie elsewhere with the JCS or Gloucester.

4.4 One can understand why members might have thought that a policy to safeguard land against something that might never happen was of little concern.

4.5 However, the second part of Policy G2 states unambiguously that, subject to matters outside the control of SDC, ***“the site will be allocated for strategic housing development”***. In other words, at the meeting on the 29th April 2021, members made a decision to allocate land without the need for any further debate on the merits or otherwise of the case.

5.1 In questioning both the need for, and probity of, Policy G2 one must question what is meant by the term “safeguarding”. The Oxford dictionary defines it as a proviso or circumstance etc. “that tends to prevent something undesirable”. In the planning sense safeguarding directions aim to ensure that land which has been earmarked for major infrastructure projects is protected from conflicting developments before construction starts.

5.2 That is not the case here, but even if it were, it would be necessary to provide evidence of a process of publicly documented commitment in order to demonstrate that the project had more than a vague possibility of happening. In this instance the policy evolved from a belief that there **might** be a future housing need and that land at Whaddon **might** be suitable. Such vagueness is not considered sufficient to justify what amounts to a safeguarding direction and leads one to question the legality of the process.

5.3 However, in this instance there is no threat of any conflicting development and no need to prevent anything undesirable as, apart from the proposed strategic housing development itself, nothing else is known. On this ground alone the policy is clearly not justified.

5.4 In essence Policy G2 provides a misleading and back door means of allocating land without adequately and openly following due process. It is not based on any proper strategic evaluation relating to the wider sub-region, including alternative development options; nor has any adequate evaluation been carried out of the site itself and the potential impacts of development on the surrounding area. In such circumstances it is difficult to see how it could possibly be claimed that with regard to Policy G2, the adopted draft Local Plan was positively prepared and justified.

Duty to Co-operate.

5.5 Policy G2 is derived from a request by the JCS [Gloucester City, Cheltenham Borough and Tewkesbury Borough] by letter of the 20th February, 2020 to “safeguard” land at Whaddon to meet the future housing needs of Gloucester, “*should it be required*”. Other communications and meetings will probably have taken place but this letter sets out the bones of the request.

5.6 It should be noted that the JCS letter does not identify an existing housing need, but only that one might be possibly be required in future. This does not seem to meet the test of soundness in the sense that no evidence has been produced in justification of need. It is far too nebulous to justify a policy as distinctive as G2.

Planning law places a legal duty on public bodies to engage “*constructively, actively and on an on-going basis*” with a number of external bodies to maximise the effectiveness of local plan preparation. In addition to neighbouring local authorities

include numerous other bodies. In this instance the inclusion of transport authorities is relevant.

6.1 It seems possible that this process has not been followed with the sincerity and diligence that is necessary. Indeed, one can't help wondering whether SDC have done little more than pay lip service to it. A number of factors lead to this conclusion. For example, there seems little evidence of any on-going constructive dialogue with the JCS in an effort to overcome the concerns expressed in the letter of the 20th February, 2020 about highway safety and issues surrounding the capacity of St Barnabas roundabout.

6.2 These problems were well known having also been the subject of correspondence with the County Highway Authority. See **Document No 2**. As an aside, one wonders what dialogue there has been with the Highways Agency with St Barnabas being an important junction on what is understood to be a designated alternative route in should the M5 be closed in an emergency. On the 26th March 2021 the Conservatives who now have control of the City and County Councils issued a Policy Statement which appears as **Document No 5** attached which states:

“Since a proposal first appeared in 2008, Gloucester Conservatives have consistently been against a large development of c 3,200 houses stretching from Grange Road down the Whaddon Valley.

We believe that this part of Gloucester is unlikely to be able to cope with the extra demands on services and infrastructure, and in particular that increasing pressure on St. Barnabas roundabout would greatly increase congestion, traffic jams and air pollution on Stroud Road.

This position is shared by the MP for Gloucester, the Leaders of both the Gloucestershire County and Gloucester City Councils and all existing Councillors and new candidates for the 2021 election. “

6.3 The key point is that when the draft Local Plan was adopted by SDC on the 29th April, 2021, it was very clear that issues relating to the Duty to Co-operate had not been sufficiently resolved with regard to Policy G2. In such circumstances and bearing in mind the legal requirement to consult other public bodies “ on an on-going basis “, it was incumbent on SDC to defer consideration of the Plan until matters had been sufficiently resolved. Whilst acknowledging that the Council may be entitled to take a different view from those bodies it must engage with, and also that eventually those bodies are likely to come to a more definitive view, it is required in the meantime to

support its position with adequate evidence. In the absence of such evidence the council's position with regard to Policy G2 lacks conviction and credibility. Effective Delivery

7.1 Delivery within the Local Plan timescale is questionable because of acknowledged doubt regarding the ability to provide adequate improvements to necessary infrastructure, in particular the road system at St. Barnabas and J12. Insufficient evidence was available at the time of the Plan was approved to provide reasonable certainty that it would be physically possible to improve the St. Barnabas roundabout to the necessary standard, or whether the cost of doing so would be so excessive as to prove unsustainable.

7.2 As identified by Mott MacDonald, three approach roads, including Stroud Road East, would require widening with land having to be acquired from adjoining owners. Even if a solution can be found it is clearly going to be a very high-cost affair and most likely to involve compulsory purchase of land. As highway improvements in this area are critical to the release of land at Whaddon for housing, it is arguable that the Plan fails on legal and procedural grounds.

7.3 In addition to St. Barnabas roundabout the Mott MacDonald Report identifies J12 and J14 on the M5 with J12 requiring a major upgrade as the Whaddon G2 site appears as second place in the Top 10 Traffic Generating Sites in the Report (page 44) The replacement of the single overbridge dumbbell arrangement with a new grade-separated signalised roundabout is categorised as a Very High-Cost Scheme of £10 million +. The Whaddon site is within easy reach of J12 and the roads leading to it have been described as rat runs in the Mott MacDonald Report. The requirement to upgrade J12 has been clearly identified but the source of funding and timescale for the work has not been considered.

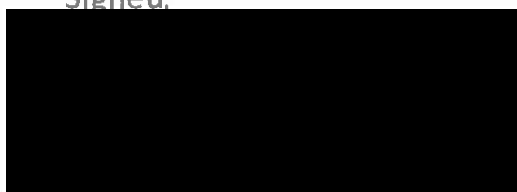
7.4 Strategic sites are generally acknowledged to be slow to develop but in this instance there is so much uncertainty about the ability to provide the necessary supportive highway infrastructure, either in total or even in part, that delivery of this site cannot be certain within the Plan period. Accordingly, the Plan cannot be said to be effective. Sustainable.

7.5 As things stand Policy G2 is not considered compliant with national policy to deliver sustainable forms of development. For all the reasons already explained it is clear that the policy is based on insufficient and inadequate evidence to provide reasonable certainty that development of the scale envisaged is possible. Without a certain critical mass there would be a distinct danger that a more limited scale of development would result in an unsustainable suburban housing estate lacking facilities and local services.

Summary and Conclusion

For the reason set out above the Parish Council strongly believes and requests that Policy G2 should be deleted on the grounds that the Local Plan in the form adopted on the 29th April 2021 is unsound. It proposes that the Plan should be modified to provide a general statement of policy that SDC will co-operate with the JCS in the event that land is required for future housing need to identify suitable site[s] after thorough investigation of strategic options based upon comprehensive evidence.

Signed:



Chair to the Council

Document No. 1

[REDACTED]
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

26 February 2020

[REDACTED]
Stroud District Local Plan Review – Joint Core Strategy response

Thank you for consulting the Joint Core Strategy (JCS) authorities (Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council) on the Draft Stroud District Local Plan. The following provides a response on behalf of all three authorities.

**What are the key challenges to this emerging strategy? Paragraphs 2.30 to 2.32.
The Gloucester fringe section**

The JCS authorities are pleased to see reference to the JCS and the commitment from Stroud District Council (SDC) to work together with the JCS authorities, and other district authorities in Gloucestershire, to identify the most sustainable sites to meet these future needs. This is further evidenced through the ongoing work around strategic growth options, which will provide the necessary evidence to define what the most sustainable development options are.

At this stage of the process, SDC has identified several sites around the southern fringe as development opportunities. These are:

- **PS30 – Hunts Grove Extension:** An existing allocation in the adopted SDC Local Plan for 750 dwellings, a primary school, associated community and open space uses and strategic landscaping.
- **PS32 – South of M5/J12:** Identified for 5ha of employment land and a strategic landscape buffer to the south east.
- **PS43 – Javelin Park:** Identified for 9ha of employment land and strategic landscaping.
- **G1 – South of Hardwick:** This site is identified as possibly having the potential to contribute towards future housing need, including approximately 1,200 new homes, a local centre, community uses, primary school, green infrastructure, open space and strategic landscaping
- **G2 – Land at Whaddon:** The proposed allocation is for approximately 2,500 new homes, local centres, secondary and primary schools, sustainable transport links, green infrastructure, open space and strategic landscaping.

Site G2 – Land at Whaddon is safeguarded to meet the future housing needs of Gloucester, should it be required, and consistent with the JCS Review. The other sites are all intended to provide for Stroud District's development needs.

Continued

JCS Review

The Adopted JCS identified that Gloucester has a shortage of land to provide for housing need between 2028 and 2031. This shortage amounts to around 1,000 dwellings. As you are aware, the JCS authorities are currently undertaking a review of the Plan, which will consider development requirements for an extended plan period, possibly up to 2041. Applying the Government's standard methodology of 657 dwellings per annum and aligning existing supply from both the JCS and Gloucester City Plan, there is a residual minimum unmet requirement of approximately 6,200 new homes during this period.

The review is at an early stage and, as such, the authorities are in the process of gathering evidence and exploring the potential for sites to fully meet these needs. In this regard, the JCS authorities are working the SDC and the Forest of Dean District Council in preparing the necessary evidence to support strategy options and the most sustainable site allocations to deliver development needs. The JCS authorities are committed to working actively and on an ongoing basis with SDC as the plan and evidence base progresses in regard to the need for land within Stroud District to contribute towards meeting the needs of Gloucester.

G2: Land at Whaddon

Notwithstanding the earlier comment regarding the JCS Review and consideration of strategy options, it is important to make comment on the potential allocation at G2 – Land at Whaddon. The site is located between Gloucester City's administrative boundary to the north, the M5 motorway and Naas Lane to the south, and the A4173 Stroud Road to the east. The JCS authorities support the safeguarding of this land to meet Gloucester's housing requirements, subject to the ongoing JCS Review and supporting evidence base.

Highways evidence prepared to underpin the adopted JCS and the Gloucester City Plan, showed that St Barnabas roundabout is operating beyond capacity. This remains a significant concern for Gloucester City Council in terms of highways safety. It is critical therefore, that in advance of any formal allocation, SDC and Gloucestershire Highways are comfortable that the additional traffic generated by the site on St Barnabus Roundabout, and the wider highway network, can be appropriately mitigated.

G1: South of Hardwick

It is noted that the site at Hardwick has been identified as an option to deliver development that contributes towards the needs of Stroud District. Again, notwithstanding the earlier comments regarding the JCS Review and strategy options, the authorities are of the view that this site should be considered as a safeguarded opportunity to provide for the unmet needs of Gloucester City. This is because of its proximity and functional relationship to Gloucester City and, inevitably, new communities in this location would use Gloucester's infrastructure.

The JCS authorities have no further comment at this stage on any of the other proposed allocations.

We look forward to working with you in a positive manner as the JCS Review progresses.

Your sincerely



Document No. 2

RE: Stroud Plan and Highways issues (Whaddon and St Barnabas Roundabout)

Dear Cllr [REDACTED]

As Gloucestershire's Highway Authority, Stroud District Council has consulted GCC Officers to comment on their consultant's analysis of the impacts of proposed development on the road network, as well as on their emerging sustainable transport strategy. One of the tools used to assess the impact of proposed development on the road network is to create and run a highway model and GCC officers therefore recently provided comments to Stroud District Council confirming that the Traffic Forecasting Report Rev C (issued by Mott MacDonald on behalf of SDC on 24th March 2021 for highway authority final comments) sufficiently presents the findings of the overall modelling assessment, noting that the future year modelling exercise has provided an evaluation of the cumulative traffic impact of the Local Plan proposed allocations within the study area. This means that officers found that the model provides a good representation of the potential impacts of the emerging Stroud Local Plan upon the highway networks.

However, officers remain concerned with the sustainability of some of the emerging sites and the potential high costs of associated highway mitigation schemes required for them and these concerns have been provided to officers at SDC, with an acknowledgement of the need for further assessment – as additional, separate studies - to understand the wider impacts of these Local Plan proposals against NPPF policies e.g. consideration of environmental impacts such as greenhouse gas emissions, noise and air quality, as well as site-specific modelling analyses for individual Local Plan allocation sites.

Furthermore, promoters for individual site allocations will also need to demonstrate the impacts of their sites with site specific transport assessments. This could include mitigation as currently recommended by SDC in the Traffic Forecasting Report, or their own mitigation proposals.

As part of the highway modelling the consultant gathered information on potential highway schemes that could be implemented to mitigate the impact of the proposed development allocations. With specific regard to the A38 St Barnabas roundabout, the highway mitigation option proposed by Mott MacDonald for the SDC model forecasting is based on details of a potential improvement scheme provided by GCC under Gloucestershire County Council's duty to cooperate with other planning authorities. The potential improvement comprised an enlarged roundabout with widening on the A38, A4173 and B4072 approaches. It should be noted however, that the improvement option which has been assessed was derived from a previous high level review of potential scheme solutions (undertaken by Atkins on behalf of GCC). Currently, all supporting information is preliminary with the need for further, more detailed work required to progress the proposal, including investigation into the specific land ownership details, and into the key constraints at this stage. The existing junction design arrangement is forecast to experience congestion requiring mitigation in the 2040 future year baseline (i.e. without the proposed Local Plan allocations). The inclusion of additional traffic from the emerging Local Plan would further exacerbate operational problems, resulting in the potential need for a larger scale mitigation scheme.

Regarding the separate question relating to the Whaddon G2 allocation, the housing numbers for this allocation are 2,500 as stated in the Draft Local Plan and Model Forecasting Report.

We are happy to discuss any further questions you may at your convenience.

Kind Regards,

[REDACTED]
Principal Transport Planner

Document No. 3

Fw: Whaddon Fields - G2 site- Stroud District Local Plan/ Traffic Forecasting Report[REDACTED]
Mon 12/04/2021 19:06

1 attachments (917 KB)

St Barnabas Pre-Strategic Outline Buisness Case_Technical Note_Final Sha... (3).pdf

Dear Councillor,

I am requested by Brookthorpe-with-Whaddon Parish Council to write on their behalf regarding the draft Stroud Local Plan which we understand is to be considered by the Council very shortly. You might recall that at the previous consultation stage the PC objected to the proposed G2 allocation of land at Whaddon and now wishes to reaffirm its objection, particularly in the context of the Traffic Mitigation Report which they received from Councillor Dave Mossman at their Parish meeting on the 6th April 2021. The Parish Councillors all hold the same view on this objection.

As the only parish authority in which the G2 site appears the Council is disappointed that the traffic mitigation report, which will have such a fundamental impact on this area and its residents, appeared only three weeks before the full Council meeting on the 29th April 2021 when we understand that the draft Local Plan is to be discussed for possible approval. Although the latest draft Local Plan has not been made available to us it seems clear from the traffic report that the G2 site remains within the draft despite our previous objection.

We have been waiting for a considerable time for these documents with three firms of developers now preparing their proposals for the three remaining sites in Whaddon. The Press have already announced the possible opening of a major school development on the site in September 2023. Having now discussed this at length in the short time we have had there are issues which we would like your Council to reconsider allocating housing on the G2 at this stage.

The G2 site

The Gloucester fringe ...Land at Whaddon

Potential to meet Gloucester's needs

- 1.1 The Joint Core Strategy (JCS) for the Gloucester City, Tewkesbury Borough and Cheltenham Borough areas has identified that in the longer term additional sites will be required to meet Gloucester's housing needs beyond 2028. Stroud District Council is committed to working together with these and the other authorities in Gloucestershire, to identify the most sustainable sites to meet these future needs.
- 1.2 An assessment of potential alternative sites to meet Gloucester's long term housing needs is currently being carried out. Land at Whaddon and south of Hardwicke (within Stroud District) have been included in the assessment, together with other sites both within and on the edge of Gloucester but within neighbouring council areas. The best performing site(s) will be identified in the respective council's future draft plan(s) for potential allocation.
- 1.3 Current indications are that Whaddon may be amongst the better performing options. If the process ultimately concludes that a site at Whaddon is not required to meet Gloucester's immediate needs, then there is potential to review how the land might contribute to Stroud's own needs and whether there is any merit in bringing it into the Stroud District Local Plan, with consequential changes to the strategy.


Constraints and designations

Whaddon is not identified in the Local Plan as a Tier 1-4 settlement and it has no settlement development limits. The Local Plan treats the area as "countryside".

Brookthorpe (a Tier 4b settlement) lies south of the M5 motorway. Gloucester is the nearest higher order settlement and it provides both strategic and local facilities.

The Cotswolds AONB lies beyond the M5, to the south. The area was not included in the Stroud District Landscape Sensitivity Assessment (which focussed on land surrounding the District's existing defined settlements), but it has been assessed through the 2015 Assessment of Strategic Development Opportunities in Parts of Gloucestershire, which compared the area's landscape sensitivity against that of other locations around Gloucester.

The principal physical constraints affecting the land identified as G2 are the floodplain (which runs through its centre) and the proximity of the M5 to the south and the Bristol-Birmingham main railway line to the west.



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The developers

Even though the JCS suggested the G2 site for Gloucester housing after 2028, developers have advanced plans for housing on the whole G2 site. Taylor Wimpey have Options on about 300 acres of Court Farm with a Masterplan for up to 2,700 houses and two schools. LQ Estates and Newland Homes have similar options on Tuffley Farm in Grange Road for a total of up to 500 houses. Taylor Wimpey's agents have told us that planning applications on Court Farm could be made next year after the Inspector's Report. They said the proposed Beacon Trust School could open in September 2023 with two main site accesses onto Stroud Road going. Savills told us that their clients LQ Estates want an allocation on Tuffley Farm for 350-450 houses, part being within Gloucester District, with Newland Homes another 60. The build period is 13-15 years.

The issues identified by the Parish Council.

A. Principle and Housing numbers.

The G2 site includes most of the land between Naas Lane and Grange Road although it excludes the existing Persimmon development site in Grange Road. The consultation draft Plan identified it to be safeguarded to accommodate the future housing needs of Gloucester" **should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy.** " Whilst it is not necessarily unreasonable to acknowledge in the written text that some land in Whaddon might be required to meet some of Gloucester's future housing needs it is premature and potentially dangerous to identify such a large swathe of land on a plan and offer the level of detail which was previously set out in the consultation Draft Local Plan.

The accompanying text talks about a mixed use site whilst the figure of 2,500 houses for the G2 site appears at page 112 and was originally quoted by Taylor Wimpey in their first draft proposals. The figure of 2,500 also appears on page 41 of the Traffic Forecasting Report.

We have been advised that Taylor Wimpey have since used the figure of 2,700 rather than 2,500. More importantly, the two other developers for remainder of the G2 site are preparing plans for up to 450 houses for LQ Estates and 60 for Newland Homes although part of the LQ site is within Gloucester District. We have been told by LQ Estates and their agents Savills that they are hoping to have their site allocated in the Local Plan and Newland Homes will want to do the same. The comprehensive development description and extent of land inherent in the G2 allocation would provide for a huge urban extension with potentially very many more house than the **indicative** figure of 2,500.

This demonstrates the inherent dangers in the process. The JCS review is running behind your Local Plan review and future Gloucester housing requirements remain unknown. Even more critically, the JCS and Gloucester City Council have yet to determine how best the City might be able to accommodate future growth. The process should involve proper consideration of infrastructure requirements and environmental constraints and must provide adequate opportunity for those people most affected, the citizens of Gloucester, to be properly consulted.

The consequence of this is that the allocation of the G2 site creates uncertainty about the final housing numbers. This is exacerbated by the fact that there are three potential promoters or developers at different sites with the G2 area which could yield more than 2,500 houses. We have just had confirmation from Stroud DC Planning Dept. that although the G2 site has been modelled for 2,500 it will be modelled again before Examination for 3,000, therefore after allocation. The possible total figure for all the Whaddon sites including Persimmon could be at least 3,250.

We understand there has been a recent change in the way that housing need is calculated with Government stipulating numbers. What effects this will have locally and on any requirement to allocate the G2 land is not clear and has not been the subject of consultation with the PC. However, examination of your Council's 5-year housing supply figures suggest a robust situation with the latest November 2020 report following the standard method of calculation demonstrating 6.56 years. There has been some suggestion that the review of the Local Plan and the need for the G2 allocation is necessary to resist applications/appeals and yet as the present local plan is quite recent (by comparison with many others) and the housing land supply figure is robust, the danger seems very small.

B. Gloucester City Council's requirement.

The G2 site was not allocated in the draft Local Plan to meet Stroud's own needs but instead it was identified to meet Gloucester's future housing need under the Duty to Co-Operate. This is confirmed by the JCS.

On the 26th March 2021 the City and County Conservatives issued this Joint Statement on Whaddon :

" Since a proposal first appeared in 2008, Gloucester Conservatives have consistently been against large development of c.3,200 houses stretching from Grange Road down the Whaddon Valley.

We believe that this part of Gloucester is unlikely to be able to cope with the extra demands on services and infrastructure, and in particular that increasing pressure on St Barnabas roundabout would greatly increase congestion, traffic jams and air pollution on Stroud Road.

We do recognise that there is demand for an additional secondary school for the south of the city, and therefore believe that the proposed Beacon Academy school should be sited closer to existing new developments and not at Whaddon.

We await confirmation from Stroud District Council about the details of the planning applications received for this area and their traffic mitigation proposals, as required by GCC Highways. Gloucester City Council will then decide how to respond.

This position is shared by the MP for Gloucester, the Leaders of both Gloucestershire County and Gloucester City Councils and all existing candidates for the 2021 election. "

At the moment the Conservatives have the Council's leadership and largest party in Gloucester and have the leadership and control of the County Council. Gloucester's MP Richard Graham is a Conservative. Although there are elections on the 6th May 2021 it is very possible that the Conservatives will remain in control or have the leadership of both Councils and that their Policy Statement will continue to frame their policies. Indeed, it is very possible that other political parties in the City might well take a similar view. A decision by Stroud Council on or after the 29th April 2021 to the Draft Local Plan could occur before those elections in Gloucester and thereby allocate land for Gloucester's use when it will be against its policy to develop.

Current Government advice relating to how the duty to co-operate applies to plan reviews and updates make very clear " **Engagement with neighbouring authorities and prescribed bodies needs to occur before a final decision on whether to update policies in a plan is made, as such engagement may influence that decision** " This illustrates the need to properly consider the wishes of neighbouring authorities, not just at officer level, but also at political and corporate level. The statement referred to above suggests that more needs to be done before a final decision is reached on the G2 site.

We submit that any decision to allocate the G2 site would be premature and we hope you will agree that it should be delayed until it becomes clear whether its adoption is against Gloucester City's policy.

C. The Duty to Co-operate and potential changes to planning law relating to the preparation of Local Plans.

You are of course aware that the allocation of the G2 arises from the Duty to Co-operate which has itself been a source of concern for your authority and which lead to your Council taking Opinion from London Counsel on whether that duty existed and whether you were under a legal obligation to provide a site for Gloucester. We believe that Counsel advised that the obligation did exist and that it was created by an understanding or agreement on the part of Stroud DC to the Planning Inspector in charge of the JCS Plan in about 2014 that land could be made available to Gloucester. However, that is in the past with a review of the JCS underway.

Indeed, a number of things have changed since then and continue to do so. In particular it is debatable whether the duty to co-operate will continue to be necessary under possible changes to planning law.

As you will be aware, the Government believes that the planning system, to use Boris Johnson's words " simply does not work". Towards the end of the last year it issued a White Paper called Planning for the Future which proposed two things relevant to this debate : firstly, that the Local Plan system should be completely overhauled and secondly, that the Duty to Co-Operate should be abolished. How and when legislative change will take place is unknown, but the Government's intention to secure change is clear. In these circumstances, surely it would be wise to avoid any decisions which might cause lasting damage to our community and might prove to have been unnecessary.

In summary:

- Planning law and the duty to co-operate may change before adoption of your Local Plan
- * The new zoning policy may prevent you from taking a site out of allocation
- * Taking Counsel's Opinion on co-operation shows that SDC was not happy to allocate

Whaddon

- * Changing this allocation must be decided upon before the full Council Meeting.

D. Highways

This being one of the fundamental issues to the G2 site the attached County Council's **Atkins Report on St. Barnabas** should be considered particularly as it did not allow for housing growth.

The G2 brief in the consultation draft Local Plan (pages 111& 112)provided justification for the site through a lack of landscape or physical constraints but paid no regard to traffic matters. Yet without doubt, the most critical factor in considering the suitability of this land for major growth is the impact it would have on the surrounding highway network and in particular how it would relate to Gloucester. The key issue of how traffic will access the City has been given no serious consideration. In the past major growth areas such as Abbeydale and Quedgeley were released by the construction of new radial roads in the form of Metz Way and the Southern Bypass. No similar sort of proposal has been suggested in this instance. On the contrary, we are left with the existing Stroud Road into Gloucester City Centre and such known traffic problems as those at the St. Barnabas roundabout to contend with.

These are serious issues for the City Council and the JCS review to consider and after local people have been consulted. Until then, we submit the G2 proposal is premature. Our County Councillor told the Parish Council meeting that this was also the view of a senior official at County Highways because of outstanding issues. We are hoping of confirmation of this by letter from him.

In the meantime, the recently published Traffic Forecasting Report leaves many other matters unresolved including :

- There are political implications in land acquisition for road widening at St. Barnabas.
- Taylor Wimpey can produce their Transport Assessments within three months and should be seen.
- The planned Beacon Trust school opening in 2023 is not considered in the Report.
- There is no comment about the Atkins Report Options which assumed no housing growth.
- The particular issues with the roads around Brookthorpe including Naas Lane and the rat run through Haresfield to the M5 were unreasonably dismissed by saying that improvements would cause more traffic.
- There seems no consideration of about 700 additional houses at the Winneycroft site in Matson and the Matson redevelopment scheme with their direct road access to Brookthorpe.
- Appendix Kon Sustainability appears to be missing.

Conclusion.

We hope you will agree that to approve the draft Local Plan at present with the G2 allocation included is **premature** for the following reasons:

1. It seems inevitable that legislative changes in planning law will soon take place with particular reference to the way that Local Plans are to be drawn up and land allocated for development. These changes might very well remove the duty to co-operate. It seems unsurprising that as a result of this uncertainty, some councils are delaying the review of their local plans.
2. In so far as the G2 land is concerned, the JCS Review is a little behind the current Stroud Local Plan review and it would not only be logical, but also more publicly acceptable, to ensure compatibility in the process of Plan making.
3. The political views of both Gloucester City and Gloucestershire County which reflect the opinions of local people are highly relevant. The view of the current leadership is that the G2 allocation would have a damaging effect on the City and should be removed. A decision should at least be delayed until after the May elections and the views of the respective Councils then sought.
4. The traffic assessment produced to support the Local Plan is insufficiently detailed to provide adequate evidence that the highway network is capable of accommodating the G2 allocation, particularly in relation to the impact on Gloucester. This issue is absolutely critical to the whole debate about the future of this land.

One final point: whilst this allocation is said to provide for a future possible but unstipulated housing need for Gloucester, the draft Plan mentions in paragraph 2.13 (page 111) that if not required for that reason, it might through a future review, contribute to "Stroud's own needs". There is a clear danger here of planning by the back door, so to speak, because once land has been identified for whatever reason in a Local Plan, regardless of qualifications, it becomes open to developer pressures. We sincerely hope you will take a very cautious approach to the dangers this proposal poses for our community.

[REDACTED]

Delegate to Brookthorpe-with-Whaddon Parish Council

Document No. 4

Fw: Whaddon Fields - G2 site- Stroud District Local Plan/ Traffic Forecasting Report

[Redacted]

Response from Cllr. [Redacted]

M

[Redacted]

Subject: Re: Whaddon Fields - G2 site- Stroud District Local Plan/ Traffic Forecasting Report

Hi [Redacted]

further to my previous email its worth noting the exact wording in our draft local plan

The policy wording for Whaddon states very clearly that: "Land at Whaddon, as identified on the policies map, is safeguarded to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. Subject to this, the site will be allocated for a strategic housing development.."

In other words, our policy does exactly what the Parish Council wants us to do – delay allocation until we know if it is needed/wanted by Gloucester City Council.

cheers

[Redacted]

[Redacted] Chair of Environment Committee

[Redacted]

Subject: Re: Whaddon Fields -G2 site- Stroud District Local Plan/ Traffic Forecasting Report

Dear [Redacted]

Thank you very much for your email and detailed response.

I will need a little time to digest this after speaking to our retired planner who is helping us. I will then come back to you if I may.

Yours,

[Redacted]

Re: Whaddon Fields - G2 site- Stroud District Local Plan/ Traffic Forecasting Report

[REDACTED]

Dear [REDACTED]

Thanks for yours.

I have had similar feedback from Simon Pickering and will be discussing that and the two hours of phone calls I have just had with the two sets of planning agents acting for the developers. If anything arises which will be of interest to you I will come back to you.

Thanks again for coming back to me.

Yours,

[REDACTED]

[REDACTED]

Sent: 16 April 2021 13:28

[REDACTED]

Subject: Fw: Whaddon Fields - G2 site- Stroud District Local Plan/ Traffic Forecasting Report

Dear [REDACTED]

I have sat on the SDC Planning Review Panel the last 9 years, where this whole issue has been the subject of much discussion. We in Stroud have always been keen to work across party and cooperate and collaborate across the County. It's important to note and understand the formal position of SDC.

The Whaddon site one the most unpopular site amongst SDC cllrs across all political parties and the majority cllrs, with the possible exception of a few resenting wards in the south of the district would vote to remove the site if it didn't risk the inspector rejecting the plan at the start of the inquiry because of the councils failure in its duty to cooperate. Cllrs in Stroud are very aware that our local plan was rejected at the start of the local inquiry in 2013 because not enough land was allocated homes ... which meant until a revised version could be submitted there were several planning applications on sites no cllrs wanted which were won on appeal because the council didn't have a local plan in place

The wording in the 2021 version of our local plan states very clearly that: "Land at Whaddon, as identified on the policies map, is **safeguarded** to meet the future housing needs of Gloucester City should it be required and provided it is **inconsistent with the approved strategy** of the Joint Core Strategy Review. **Subject to this, the site will be allocated for a strategic housing development..**"

This is a way that Stroud can meet our legal obligations and yet still require justification from our neighbouring authorities (through a public examination process) before we go ahead with allocating the site.

The key wording in current 2021 draft says that SDC is **safeguarding the site**, (**not allocating the site**) should it be required of Gloucester City.

So if in final version of JSC local plan Gloucester City allocated enough land within the JCS area for their housing need this will **not be allocated by Stroud District for housing**

The basic problem is politics with the JCS and councils within the JCS not wanting to allocate land within there area ,or in just into Forest of Dean area close to Gloucester pushing it on to Stroud, which under the duty to corporate Stroud must consider ..

There now appear to be lots of politics going on in Gloucester city trying to blame Stroud for safeguarding a site that Gloucester City council itself has previously requested Stroud to safeguard |

Trust this puts the record straight.

Best Wishes

[REDACTED]

Labour and Co-op Cllr for the Stanley's

[REDACTED]

Sent: 12 April 2021 20:06

[REDACTED]@bva.uk

Subject: Fw: Whaddon Fields -G2 site- Stroud District Local Plan/ Traffic Forecasting Report

Dear Councillor,

I am requested by Brookthorpe-with-Whaddon Parish Council to write on their behalf regarding the draft Stroud Local Plan which we understand is to be considered by the Council very shortly. You might recall that at the previous consultation stage the PC objected to the proposed G2 allocation of land at Whaddon and now wishes to reaffirm its objection, particularly in the context of the Traffic Mitigation Report which they received from Councillor Dave Mossman at their Parish meeting on the 6th April 2021. The Parish Councillors all hold the same view on this objection.

As the only parish authority in which the G2 site appears the Council is disappointed that the traffic mitigation report, which will have such a fundamental impact on this area and its residents, appeared only three weeks before the full Council meeting on the 29th April 2021 when we understand that the draft Local Plan is to be discussed for possible approval. Although the latest draft Local Plan has not been made available to us it seems clear from the traffic report that the G2 site remains within the draft despite our previous objection.

We have been waiting for a considerable time for these documents with three firms of developers now preparing their proposals for the three remaining sites in Whaddon. The Press have already announced the possible opening of a major school development on the site in September 2023 .

Document No. 5

OK



Joint statement on Whaddon

Friday, 26 March, 2021

Since a proposal first appeared in 2008, Gloucester Conservatives have consistently been against a large development of c3,200 houses stretching from Grange Road down the Whaddon Valley.

We believe that this part of Gloucester is unlikely to be able to cope with the extra demands on services and infrastructure, and in particular that increasing pressure on St Barnabas' roundabout would greatly increase congestion, traffic jams and air pollution on Stroud Rd.

We do recognise that there is demand for an additional secondary school for the south of the city, and therefore believe that the proposed Beacon Academy school should be sited closer to existing new developments and not at Whaddon.

We await confirmation from Stroud District Council about the details of planning applications received for this area and their traffic mitigation proposals, as required by GCC Highways. Gloucester City Council will then decide how to respond.

This position is shared by the MP for Gloucester, the Leaders of both the Gloucestershire County and Gloucester City Councils and all existing Councillors and new candidates for the 2021 election.

[Local News](#)

You may also be interested in

['Over the moon' - the University comes into the centre of Gloucester by buying Debenhams](#)
Friday, 19 March, 2021