

ON BEHALF OF REDROW HOMES (SW) LTD

**REPRESENTATIONS TO STROUD DISTRICT
COUNCIL'S LOCAL PLAN REVIEW
'ADDITIONAL HOUSING OPTIONS'
CONSULTATION**

**IN RESPECT TO LAND NORTH OF CHARFIELD
ROAD, KINGSWOOD**

December 2020

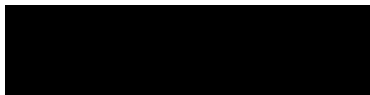
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'ADDITIONAL HOUSING OPTIONS' CONSULTATION**

IN RESPECT TO LAND NORTH OF CHARFIELD ROAD, KINGSWOOD

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1.0 INTRODUCTION

1.1 On behalf of Redrow Homes (SW) Ltd and the landowners, Grass Roots Planning have been instructed to prepare and submit representations to Stroud District Council's Local Plan Review 'Additional Housing Options' (AHO) consultation, currently taking place until the 16th December 2020. This is with particular reference to land north of Charfield Road, Kingswood, which is being promoted by Redrow Homes for development.

1.2 This document sets out our concerns to the emerging Stroud Local Plan Review and the strategy it contains, as further refined in the AHO document. The focus of these concerns relates to the spatial strategy currently adopted and the fact that it relies too heavily on strategic-scale sites and those selected are not underpinned by robust evidence to demonstrate why they are the most sustainable and viable options to accommodate housing growth in particular.

1.3 As part of this document we will set out how we consider the emerging plan fares when considered against the tests of soundness that are set out in paragraph 35 of the NPPF which are as follows:

- a) **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.4 In addition to our main concerns that the plan is relying too heavily on strategic-scale sites, we are concerned to see that there is no provision for the Wotton cluster which provides a significant existing concentration of employment and an established population, thereby it disregards a very sustainable location for new development at the Wotton/Kingswood cluster. We are specifically promoting a site for future allocation in the Local Plan at land north of Charfield Road, Kingswood (the site) for circa 300 homes, two-form entry primary school and extensive formal parkland. This could provide a suitable replacement site if existing proposed

allocations are found to be unsound, a broader portfolio of sites is required, or housing numbers need to be increased across the district.

1.5 The land at Kingswood and the proposals for it are set out in the accompanying documents listed below. In addition, a series of technical assessments have been undertaken in support of the development proposed and to inform the masterplan for land north of Charfield Road and these should be read in conjunction with this statement:

- Appendix A – Site Location Plan
- Appendix B – Vision Document
- Appendix C – Landscape Strategy
- Appendix D – Scoping Report Flood Risk & Drainage Strategy
- Appendix E – Preliminary Ecological Appraisal
- Appendix F – Odour Report
- Appendix G – School Capacity Report

1.6 In summary we have a range of concerns regarding the currently proposed spatial strategy and believe it to be unsound for the reasons we will describe. We have examined the previous representations submitted in respect to the Redrow site at Kingswood by Boyer Planning in January 2020 and are in broad agreement with their conclusions. As such, we have expanded on a number of their concerns and have responded to the questions raised as part of this consultation, which includes how SDC intend to allocate additional sites that are required to address increased housing numbers that have been identified as being needed as part of MHCLG's 'Standard Method' for calculating housing need.

1.7 Primarily we consider that the strategy in the Local Plan relies too heavily on strategic-scale sites, and some of the strategic sites it selects are not underpinned by robust evidence to show they are deliverable, particularly in terms of viability. There is also a serious lack of credible evidence to underpin the Council's views that the selected large strategic sites are suitable and sustainable locations for development, and therefore there is little to support a conclusion that the strategy is justified with reference to paragraph 35 of the NPPF.

1.8 To address these concerns, we consider that the flawed strategic allocations (such as Sharpness and Wisloe) need to be removed from the plan to reduce overreliance on larger sites and focus provided on the more appropriate location of Kingswood. Additionally a broader and more diverse portfolio of land should be allocated in varying sizes to deliver homes and other development over the next five years and beyond; this should include allocating land at settlements such as Kingswood which will diversify the portfolio of land

owners here, and hence potential production outlets, in this sustainable location. We consider that this more diverse portfolio solution presents the most sustainable and credible option for meeting the increase housing need set out by MHCLG.

- 1.9 Land north of Charfield Road, Kingswood offers a highly sustainable location for new development which can meet the needs of not only this settlement but nearby Wotton-under-Edge, which, due to its Area of Outstanding Natural Beauty (AONB) status, has received little growth over the last 10 years (circa 7% growth between 2011 – 2018 according to Kingswood Parish Council’s representations submitted in 2020). As such, it is our view that there is a residual need for affordable housing and other infrastructure requirements which could be met on land in Kingswood.

- 1.10 The site is of a scale that could deliver the critical mass of development to provide new infrastructure for the settlement (including primary school provision and affordable housing), as well as sustaining everyday facilities and services in the area. It could also be delivered quickly, in advance of a larger strategic allocation elsewhere in the district, which will boost housing supply in the short term and address a lag in delivery that will inevitably come from the council’s reliance on large scale sites that take many years to deliver based on available evidence.

2.0 THE HOUSING REQUIREMENT AND EXISTING SUPPLY

Housing Requirement

- 2.1 We are pleased to see SDC applying a pragmatic approach to the potential increase in housing numbers issued by the Ministry for Housing, Communities & Local Government (MHCLG) in August 2020 and are responding to this issue now, rather than progressing with the draft Local Plan Review 'as is'.
- 2.2 We agree that SDC should be looking to adopt the higher annual needs figure of 786 per annum (15,720 over the 20-year plan period) and we commend SDC for taking this positive approach to overall housing delivery.

Existing Supply

Windfalls

- 2.3 We agree with Stroud's inclusion of windfalls given that this has been monitored over the previous 13 years and shows that consistently they have delivered circa 75 dwellings per annum across the whole district. However, similar to the five-year housing land supply calculations, it is our view that this should only contribute 17 years' worth of delivery to avoid double-counting as small sites with permission must be included within the supply table.
- 2.4 Accordingly, 1,275 dwellings should be included within the supply and this should reduce by 75 dwellings per annum until the plan is adopted to avoid double counting – for example if the plan is adopted in 2022, 150 dwellings should be removed from the overall supply.

Reserve Supply

- 2.5 We support the provision of a reserve supply but would suggest that this needs to be quantified and allocated now, so that the plan has flexibility in the long-term should this be required. A clear policy mechanism could be established to set the trigger that would require a consideration of reserve sites; for example a deficit in five-year housing land supply, or if evidence shows that a site currently allocated will not come forward.

4.0 THE CURRENT SPATIAL STRATEGY

4.1 The Local Plan Review 2019 focuses growth on Cam and Dursley, Stonehouse, the southern Gloucester fringe and Stroud, followed by two new settlements at Sharpness and Wisloe. Employment growth has been focused on accessible locations within the A38 / M5 corridor, such as the allocation of land for economic development adjacent to the existing Renishaw campus northwest of Kingswood.

4.2 Settlements have been divided into tiers, with Kingswood described as a Tier 3a settlement.

4.3 An extract of the proposed allocations in the Local Plan Review is shown below:

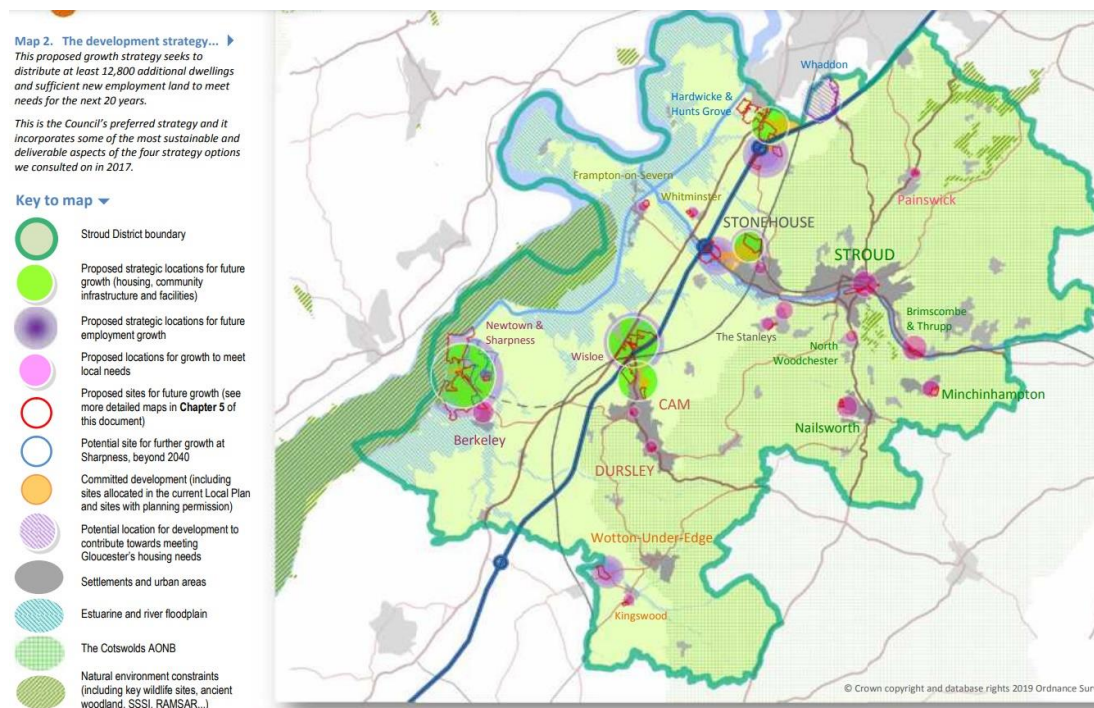


Figure 1. Proposed Development Strategy for Stroud

4.4 As the map clearly shows, there is no significant planned development for the Wotton cluster, which includes the settlements of Wotton-under-Edge, Kingswood, North Nibley, Alderley, Hillesley & Tresham, which range between Tier 2 and Tier 4b settlements according to the hierarchy. Between these settlements, which amounts to a significant population (over 8,600 residents according to the 2011 Census) there is practically no supply planned – only 50 dwellings at land south of Wickwar Road (allocation PS38). This is inappropriate given the scale of the existing settlement, the affordable needs that will be arising from this population (which we will go onto discuss in more detail later in this document) and the sustainability merits of the location in terms of the ability to maintain and strengthen public transport provision.

4.5 The objective for the Wotton Cluster according to the Local Plan Review (page 59) is to "improve access to jobs, services and facilities in the south of the District, to boost local sustainability and community vitality". A key issue identified is the number of people commuting to other areas such as Thornbury, Yate and Bristol for work. We agree that a key objective should be to reduce this level of out-commuting and we strongly support the provision of a large-scale employment allocation at Renishaw. However, it is our view that there needs to be supplementary housing growth to support this and address needs arising from within this area.

Strategic Sites

4.6 We have also considered the type and mix of supply anticipated to come forward over the next twenty years in Stroud. Housing need and anticipated supply is set out in the image below which is taken from the Draft Local Plan 2019:

Calculating our residual housing requirement up to 2040 ▼			
Supply	A	Large sites commitments, at April 2019 (on sites with permission / under construction)	5,044
	B	Small sites commitments, at April 2019 (on sites with permission / under construction)	532
	C	Other firm commitments, at April 2019 (on sites subject to resolutions to grant permission)	164
	D	Total commitments (= A + B + C)	5,740
	E	Commitments (D) minus undeliverable sites	5,223
Requirement	F	Housing requirement 1 April 2019 to 31 March 2020	456
	G	Draft housing requirement 1 April 2020 to 31 March 2040 (= 638 pa x 20 years)	12,760
	H	Minimum residual housing requirement to 2040 (= F + G - E)	7,993
Allocated sites in Draft Local Plan		8,725	
Small sites allowance (75 pa x 18 years)		1,350	
Total housing supply in Draft Local Plan		10,075	

Figure 2. Extract of Draft Local Plan 2019

4.7 Of the proposed allocations, there are a significant proportion of strategic sites which are set out below. This does not take into account existing strategic-scale commitments or allocations proposed as part of the Local Plan 2015, the proposed allocation at Whaddon put forward in the 2019 Local Plan Review document (2,500 homes) to meet the needs of Gloucester City, nor the AHO being considered in this consultation at Whitminster (2,250 homes) or Moreton Valence (1,500 dwellings).

Strategic sites ▼	Number of dwellings at each
Cam North West	700
Cam North East Extension	180
South of Hardwicke	1,200
Hunts Grove Extension	750
Sharpness Docks	300
Sharpness	2,400 (5,000 by 2050)
Stonehouse North West	650
Wisloe	1,500
Local sites at smaller settlements ▶	1,045 (cumulative)
Total	At least 8,700

Figure 3. Proposed Strategic Scale Allocations in Draft Local Plan 2019

4.8 By removing extant permissions (some of which will be coming forward on strategic-scale allocations in any event), strategic sites make up 7,680 dwellings of the total new supply set out in the 2019 draft plan. This equates to 50% of the total number of dwellings anticipated to come forward (15,298 homes once existing commitments are taken into account) and 76% of the allocations and windfalls proposed as part of this plan (10,075), which is an extremely high proportion of overall growth and in our view represents an acute over-reliance on such sites.

4.9 We have compared this to other authorities within the region and note that the proportion attributed to strategic allocations is significantly lower, as shown below in table 1:

Table 1. Comparison of proportion of strategic-scale allocations in other authority areas

	Stroud Local Plan Review (2019 draft plan)	Cotswold District Council (2011 – 2031)	South Gloucestershire Council (2006 - 2027, adopted in 2013)	Tewkesbury, Cheltenham & Gloucester Joint Core Strategy
Housing Need	12,800	8,400	28,355	35,254
Total Supply	15,298	9,614	28,850	31,824
Number of dwellings from Strategic Allocations (over 500 units)	7,680	1,800	10,400	11,400
% of Total Supply	50%	19%	36%	36%

- 4.10 If the AHO sites at Whitminster and Moreton Valence are also allocated without any of the other unsuitable allocations removed such as Wisloe & Sharpness, the overall proportion of strategic sites goes up even further, as follows:

Table 2. Proportion of strategic-scale sites proposed if both AHOs are allocated

Housing Need (MHCLG revised standard method) (786 homes x 20 years)	15,720
Total Supply (includes extant permissions, allocated sites in Draft Local Plan, windfall allowance and potential options at Whitminster (2,250) and Moreton Valence (1,500))	18,420
Number of dwellings from Strategic Allocations (over 500 units)	11,430
% of Total Supply	62%

- 4.11 The inclusion of these sites on top of the existing strategic-scale allocations that have already been put forward would result in 62% of overall supply being from this type of site and 82% of the new allocations and windfalls proposed (11,430 homes would be allocated on strategic sites out of 13,825). This makes the overall reliance on such sites rise to a level which does not even come close to other districts in the area and represents an extreme risk to housing delivery in SDC.
- 4.12 SDC are therefore relying far too heavily on strategic sites to come forward in a timely fashion to deliver the housing required to meet objectively assessed need and 5YHLS targets. Evidence to date has demonstrated that this is difficult to achieve. The second edition of Lichfield's paper 'Start to Finish' published in February 2020 identifies that sites of over 500 dwellings are anticipated to take 5 – 8.4 years from the outline application being validated to the first home to be delivered. Given the lack of progress on detailed proposals for these sites, with no outline planning applications submitted as yet (with the exception of Sharpness Docks), it's clear from the Lichfields evidence that the overreliance on strategic sites will push the vast majority of housing delivery into the later part of the plan which will lead to an acute undersupply in its first ten years and then a glut of supply after that point, if the sites selected do actually prove viable.
- 4.13 With consideration of the table above, the number of strategic allocations proposed in Stroud is significantly higher than nearby authorities. South Gloucestershire Council and the Tewkesbury, Cheltenham & Gloucester authorities whose strategic allocations make up 36% of their overall supply, far lower than Stroud's, have repeatedly been found unable to

demonstrate a five year housing land supply despite having an up-to-date plan. We therefore have concerns over the ability for these sites to delivery identified housing requirements in a logical and sustained way. This is because there are fewer smaller allocations available, which can come forward more quickly and 'plug' the gap before large strategic sites come on stream and deliver.

4.14 We also have significant concerns about some of the strategic-scale sites proposed in the Draft Plan and the AHO, which we go on to describe in the next section. These mainly relate to the limited evidence provided to underpin their viability and / or deliverability.

4.15 In particular, the 'Assessment of Strategic Development Opportunities in Parts of Gloucestershire' undertaken by HDH Planning & Development which considers strategic development options in Stroud (Appendix 6 of this report (December 2019)) states at paragraph 10.52 that *"if the Councils proceed with the inclusion of the large greenfield sites in the future Plans, we suggest a cautious approach as it is not possible to capture the detail of viability (particularly in relation to the infrastructure requirements) of large strategic sites in a high level study of this type. It would therefore be prudent of the Councils to engage with the developers and landowners before relying on these types of site in the future"*.

4.16 Paragraph 67 of the NPPF requires that when identifying land for homes, as part of a plan, authorities planning policies should:

'identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'.

4.17 Another new growth point, as indicated under Option C, is only viable if some existing strategic allocations, such as Sharpness and Wisloe (which are not sustainable and credible options), are removed and replaced with a single more suitable option, such as a strategic allocation at Whitminster. The housing that would be lost by removing these two strategic scale, but inappropriate allocations, should then be re-distributed as smaller-scale allocations at settlements such as Kingswood (and Whitminster) to provide a greater variety of sites that can come forward more quickly and thereby reduce the overreliance on strategic sites.

4.18 This is because we consider that there is limited evidence associated with the allocations proposed at Sharpness and Wisloe which undermines their credibility; furthermore we have concerns that they are not viable in terms of needing to deliver the infrastructure required to make these places sustainable whilst also delivering the affordable housing needed district-wide.

4.19 As we have seen limited evidence in this regard regarding certain particular sites, we consider that the evidence underpinning the Local Plan Review fails to meet PPG which states "*the role for viability assessment is primarily at the plan making stage*"(Paragraph: 002 Reference ID: 10-002-20190509). Therefore, the plan is unsound as it is not justified with such evidence nor can it be considered that it will be effective without this.

4.20 To address our concerns, we consider that three significant amendments to the plan strategy need to be considered:

- Some of the strategic sites selected need to be reconsidered and removed from the strategy, our view is that this should include Wisloe and Sharpness because the evidence underpinning them is not robust and the viability and commercial attractiveness of both sites has not been proven;
- We consider the ability of Moreton Valence to deliver housing is overstated and also provides supply where significant growth at Hunts Grove has already occurred;
- To compensate for the loss in housing numbers resulting from the reconsideration of these three strategic sites we suggest the following approach is adopted:
 - A much broader portfolio of sites should be included in the plan including sites that can be delivered without the sort of scale of infrastructure that the current strategic allocations require, such as land north of Charfield Road in Kingswood;
 - The proposed capacity of Whitminster, the evidence for which is much more robust and compelling, be increased and Redrow's land interest at this location included in an expanded allocation to circa 2,500 homes.

4.21 In our view, a broader portfolio of sites is required to achieve a balanced range of site sizes and types which will allow development to come forward in future years to meet the need required, including affordable housing. Currently we do not consider the portfolio, with its significant overreliance on strategic sites, meets the Economic Objective set out in the NPPF (Paragraph 8) to:

'help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth'.

4.22 When considering the four different spatial options set out in the 'Additional Housing Options' consultation paper for allocating additional housing land therefore, we are of the strong

opinion that Option A (intensifying existing allocations) is not credible unless there has been significant technical work and masterplanning undertaken to demonstrate the increase in units is achievable without resulting in adverse effects, as otherwise it will involve placing further pressure on existing allocations, mainly strategic allocations, to deliver the housing needed to ensure the plan is sound. This does not achieve the NPPF's guidance which requires a balanced portfolio of sites to be delivered and that the strategy be underpinned by evidence – because the evidence around such a strategy (the Lichfield's 'Start to Finish' paper in particular) suggests it will push housing delivery to the back end of the plan period which is not an effective and justified strategy, and is therefore unsound.

4.0 COMMENTS ON SPECIFIC ALLOCATIONS

Cam / Wisloe

- 4.1 There is an existing allocation in Cam for 450 dwellings to the north-east which has been granted planning permission under application ref: S.15/2804/OUT, of which 3 dwellings have been completed to date, according to the most up-to-date 5YHLS paper. The Local Plan Review seeks to allocate a further 700 dwellings under the 'Cam North West' allocation and 180 dwellings at the 'Cam North-East Extension', equating to a strategic allocation of 1,604 homes over the next 20 years.
- 4.2 In addition to this, the proposed allocation at Wisloe for 1,500 also lies in close proximity (circa 800m from Cam's boundary) to the northern edge of Cam and effectively will be the same market. The brings a total of 3,180 dwellings over the next twenty years which is a significant expansion of this settlement and in our view is an oversupply in a tightly defined geographic area.
- 4.3 We do not consider that the allocation at Wisloe is credible at this time for a number of reasons.

Deliverability

- 4.4 Firstly, the land ownership plans and promotion material submitted to date is extremely limited and no technical evidence appears to have been provided to underpin its ability to be viable and deliverable. An extract of the land ownership plan is below; whilst the document states it is 'jointly' owned by the Ernest Cook Trust and Gloucestershire County Council (GCC) this is somewhat misleading as they actually own different land parcels which make up the site.

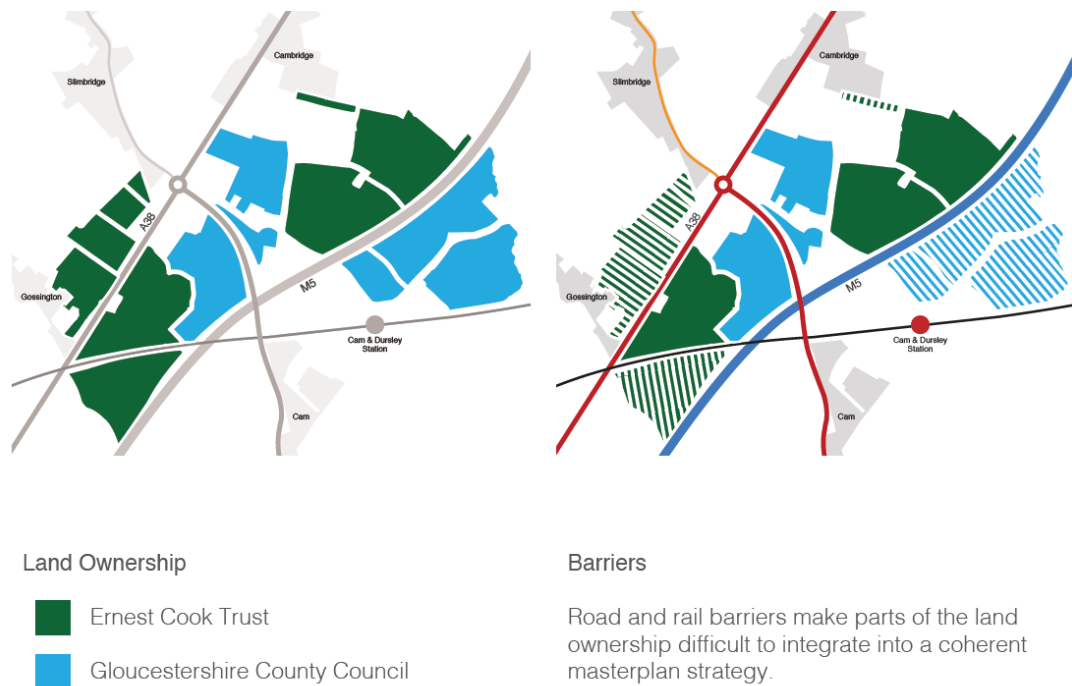


Figure 4. Extract of promoter's material which shows the land ownership parcels at Wisloe Garden Village

- 4.5 It is also unclear from the information available whether any sort of agreement has been reached between the owners in respect to equalisation, to ensure the site will be delivered comprehensively with infrastructure properly planned and paid for, rather than in a piecemeal fashion. There is no framework masterplan available within the Vision Document which shows how the constraints have informed the layout for the site, and that the delivery of 1,500 is actually achievable. There also appears to be no partnership with a housebuilder or an affordable housing provider to deliver these houses.
- 4.6 Accordingly, we have significant issues with this allocation given the clear lack of evidence associated with it relating to viability or deliverability.

Land Uses Proposed

- 4.7 Paragraph 2.52 of the Draft Local Plan Review 2019 states that *'the latest job forecasts for the District suggest the need to plan for between 2,300 and 6,300 net new jobs'*. This is a very broad target and it is our view that SDC needs to be planning for the higher level of jobs to have an ambitious plan that will address issues of out-commuting to other areas in the region. It is then stated that 14.4 hectares of employment land will need to be delivered but this is not translated into numbers of jobs; it is therefore unclear whether the targets set out in paragraph 2.52 are being achieved.

- 4.8 According to the Settlement Role and Function Study Update (2018) prepared by SDC we note that Cam and Dursley currently has an imbalance in respect to jobs and economically active people, with a ratio of 0.47 jobs to 1 economically active resident. Therefore, any development in this location should seek to redress the imbalance of jobs and workers and reduce the level of out-commuting to other settlements which contributes to significant CO₂ emissions and congestion from those travelling to and from work via private car.
- 4.9 The significant allocations at Cam and Wisloe therefore should be including employment land within them, currently we note that the extent of this is extremely limited and our view is that the delivery of these sites will result in significant numbers of economically active people having to travel outside of the settlement for work. This needs to be rectified either through removing these sites (which for other reasons, we do not think Wisloe is credible anyway) or the policy requirements changed to include further allocations of employment land. In turn, this will likely have a knock-on effect on the masterplanning for these sites and a reduction in their potential housing yields.
- 4.10 We have calculated this based on a number of reasonable assumptions which are as follows:
- According to the Settlement Role & Function Study prepared by SDC, there were 4,150 local workers (economically active people) and 1,980 local jobs in 2018 at Cam/Wisloe, equating to a ratio of 0.47 : 1.
 - Within the Draft Local Plan 2019 (Table 1, page 12), it states that there are 53,078 dwellings in Stroud and 66,700 economically active people, equating to a ratio of 1.25 economically active resident per dwelling;
 - National statistics state there are 24.4 million dwellings (Dwelling Stock Estimates 2019) and 34.1 economically active people (NOMIS labour market), equating to a ratio of 1.4 economically active residents per dwelling;
 - The new allocations at Cam (880 dwellings) plus Wisloe (1,500 dwellings) therefore results in between 2,975 and 3,332 additional economically active people in the area (using either a ratio of 1.25 or 1.4). In addition, the existing allocation at NE Cam will produce a further 563 – 630 local workers because this is yet to be built out.
- 4.11 General guidance from the Roger Trym Report (2004) states that only a third of any employment allocation land take is actually used for employment purposes. Therefore, despite the existing allocation for NE Cam incorporating 10 hectares of employment land in the policy requirements, the masterplan for the application only shows 34,665m² of employment space for B1, B2 and B8 purposes, which is significantly lower.

- 4.12 Taking an average of the Employment Densities Guide 2010 full-time employee per m² for these uses, this equates to 990 jobs being delivered from the existing NE Cam allocation adopted in the 2015 Local Plan. The allocation at Wisloe incorporates 5ha of land – taking the same assumptions, this will equate to circa 430 jobs. The other allocations at Cam do not include any employment land provision.
- 4.13 On a very basic level therefore, the proposals at Cam when completed could provide a total of 8,000 economically active residents in an area with only 3,400 jobs available, worsening the ratio of jobs to workers to 0.42 : 1, further exacerbating the issue of out-commuting, an outcome which national planning policy seeks to avoid. It should also be noted that the Scoping Report issued for the north-western allocation at Cam states that they intend to deliver 1,100 dwellings at this allocation, rather than 880, which means this issue could be even further exacerbated.
- 4.14 The plan needs to be more ambitious in its ability to address this issue if SDC are serious about addressing the Climate Change Emergency; in our view the current strategy for the Cam area is an unsustainable approach and will exacerbate existing problems associated with out-commuting. This does not appear to have been considered in any of the representations or work undertaken by SDC to date and has not been considered from a masterplanning perspective in terms of land-take, and whether these sites should be incorporating employment land.
- 4.15 We also have concerns relating to the technical work underpinning the allocation and the constraints associated with the land, including highways, landscape, agricultural land, noise, and utilities.

Highways Impact

- 4.16 As highlighted above, Cam is going to experience a significant amount of development over the next twenty years. In addition, the allocation of land at Wisloe will put further pressure on the existing highways and to date we have seen no evidence to demonstrate that this will not cause significant adverse effects on the road network from the provision of over 3,000 dwellings at this location.
- 4.17 Paul Basham Associates who are supporting Redrow Homes on technical highways matters have considered this issue and note that, whilst improvements to the north-bound on-slip at Junction 13 of the M5 were secured as part of an application in 2014, the Infrastructure Delivery Plan (2020) notes that traffic at the junction is expected to increase 'substantially'.

The impact of additional allocations in this area is likely to significantly burden this junction to around 90% capacity in the morning peak and 92% capacity in the evening peak.

Landscape / Coalescence

- 4.18 The allocation at Wisloe does not appear to have been assessed as part of any landscape sensitivity assessment undertaken by SDC. The evidence underpinning the allocation in this regard is therefore significantly lacking – as the map shows the last work undertaken was in 2016 and did not assess any land beyond the M5 to the north-west. The 2019 update does not reference the land at Wisloe and the site therefore does not appear to have been assessed in landscape terms. The evidence prepared by the promoters to date is extremely limited, with the exception of the vision document which states *"the surrounding is very flat with ground only rising another 2-3km to the east. This allows long distance views to the horizon. On site, hedgerows are fragmented and poor quality"*. It can be seen from the image below that the land on the south-eastern edge of Slimbridge was given a medium/high sensitivity to change in 2016 – it is therefore possible that the allocation at Wisloe also has a similar sensitivity, or potentially higher.

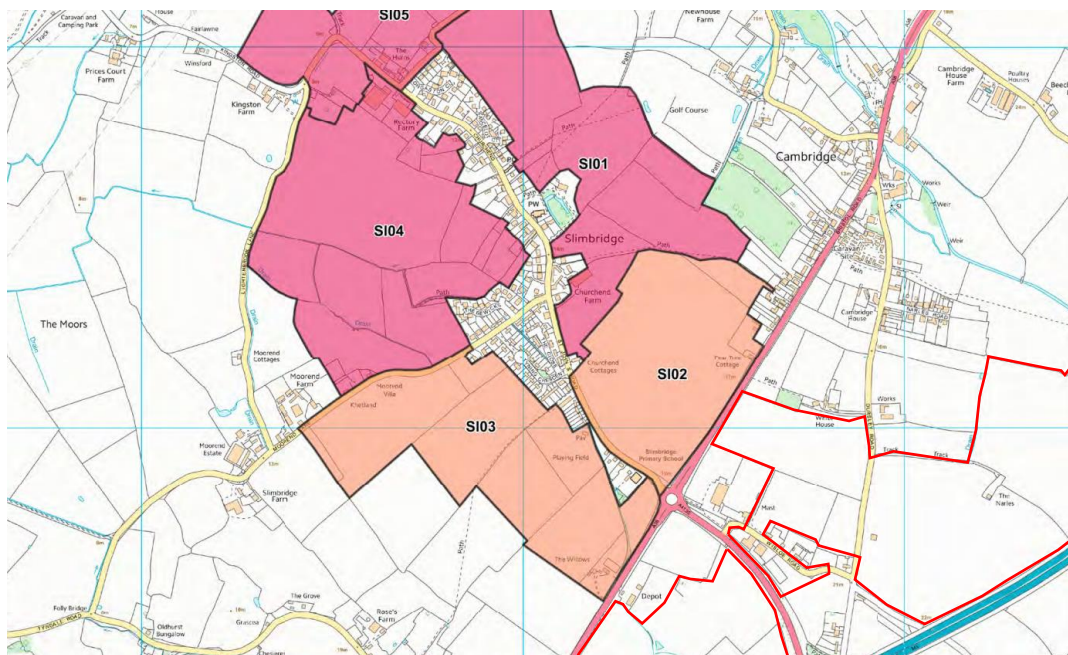


Figure 5. Extract of SDC's Landscape Sensitivity Assessment 2016 (part of Wisloe allocation shown in red) – no updates appear to have been undertaken in support of the Local Plan Review

- 4.19 Before any decision on such a large scale allocation is made a full and objective assessment of the landscape sensitivity of the site needs to be undertaken by SDC which would inform the masterplan of any constraints. Without this information, it is unclear how credible it is to say that 1,500 dwellings will be delivered in this location without significant adverse landscape impacts.

4.20 Further to this, the proposed allocation at Wisloe sits between existing settlements, including Slimbridge, Cambridge, and Cam / Dursley. No assessment of the issue of coalescence, or perceived coalescence, appears to have been undertaken. Again there could be significant negative impacts which are yet untested in regard to this issue.

Agricultural Land Quality

4.21 The majority of the land appears to be Grade 2 Agricultural Land Quality, as shown below in figure 6 (MAFF data, extract taken from ArcGIS mapping system). We note the Wisloe Action Group's previous representations which state that an independent assessment has been undertaken by Soil Environmental Services Ltd which states the land is Grade 3b – we have been unable to obtain a copy of this but would raise this as a potential constraint to the land's development. Grade 2 land is considered to be the Best and Most Versatile Agricultural Land and The NPPF advises against its loss for development (see paragraph 170).

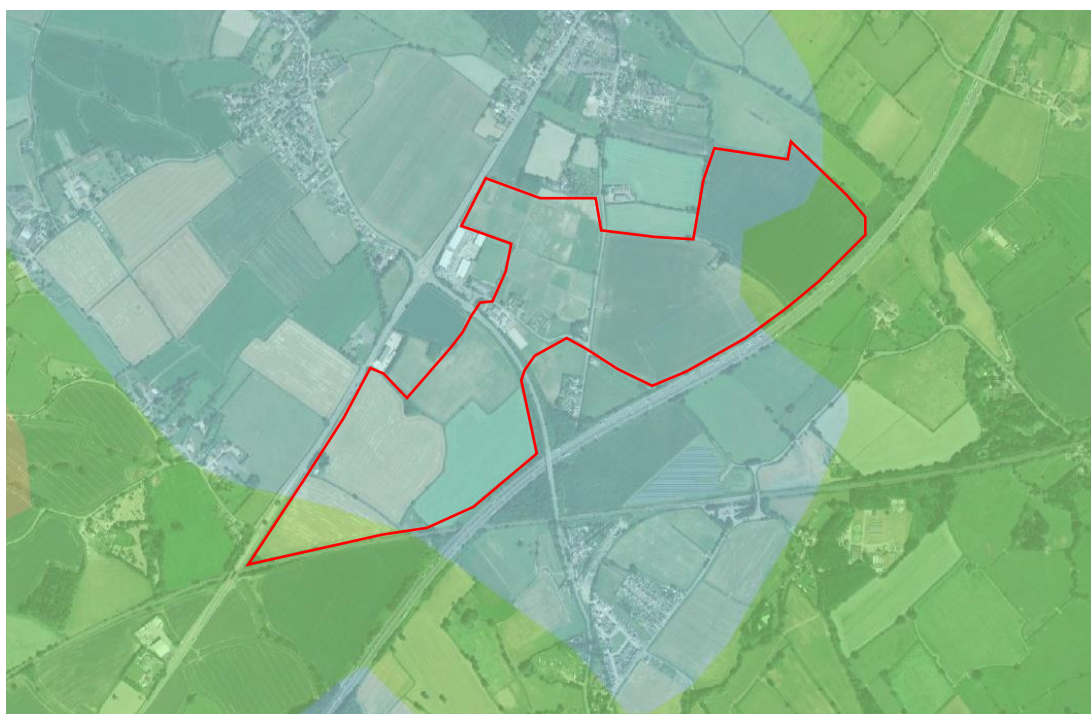


Figure 6. Extract of Agricultural Land Quality Maps which show the majority of the Wisloe allocation is Grade 2 (light blue) with a small proportion Grade 3 (approximate site area shown in red)

Noise

4.22 We have been unable to find any technical assessment of noise issues at the site despite there being reference to such an assessment being made in the Peter Brett Associates (now Stantec) representations. Whilst we don't believe that this will create an undeliverable scheme it does present a constraint to the development and it is highly likely that a substantial buffer,

bund and / or barrier will need to be created adjacent to the M5 to ensure there will be no adverse impact in terms of amenity on future local residents. This in turn will have a knock-on effect on the masterplan for the site and we question whether 1,500 is actually achievable once this constraint is taken into account.

Utilities

4.23 We note that there are a number of utilities services which cross the bulk of the land at Wisloe, none of which have been referenced as a constraint in the promotion material put forward by the promoters of the land. This includes a High Pressure Gas Main (Wales and West Utilities (WWU) controlled) and overhead electricity cables owned by Western Power Distribution (WPD). These are shown on the maps below in figures 7 and 8.

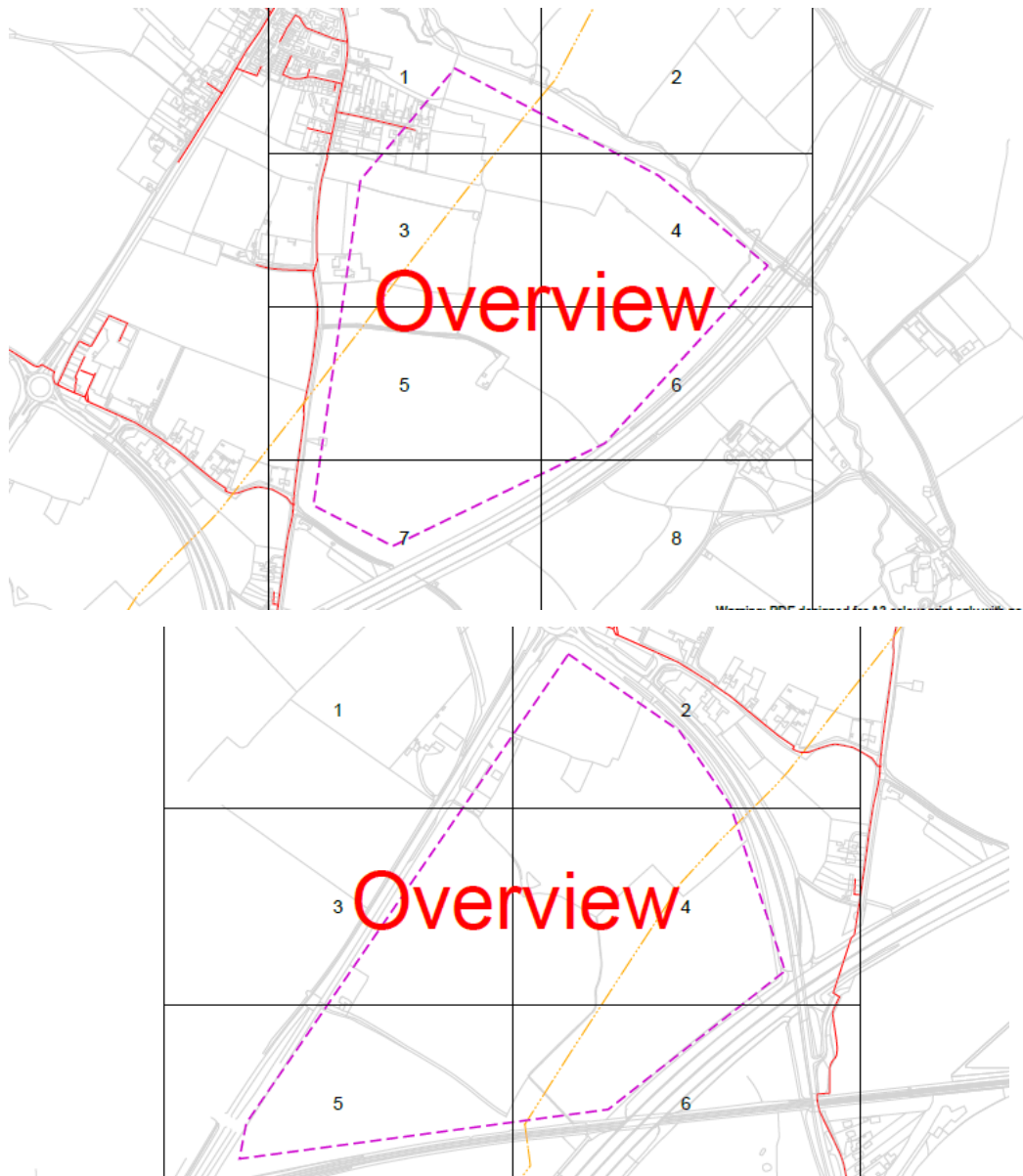


Figure 7. Route of High Pressure Gas Pipe owned by WWU crossing the allocation at Wisloe (shown with orange broken line)

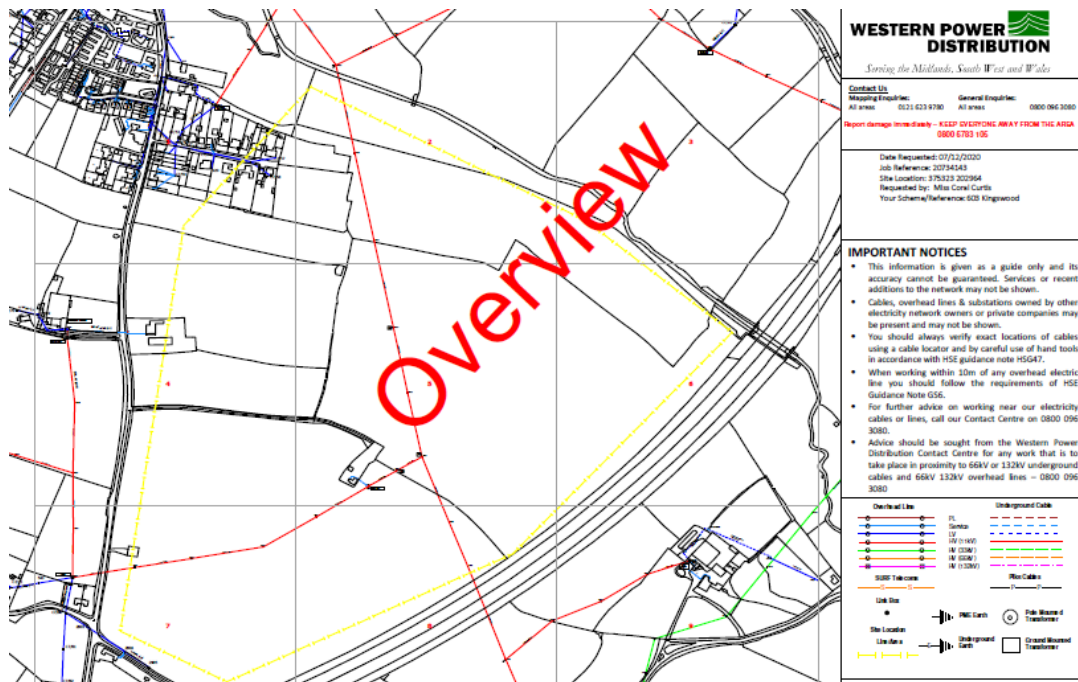


Figure 8. Extract of WPD showing overhead lines / underground cables owned by WPD (red line)

4.24 We can find no evidence of these constraints being considered and how it will impact the masterplan for the allocation, nor any evidence that discussions have been held with the various utilities companies to ascertain how this will be addressed, and if relocation is required, how much this will cost and how it will be paid for. As such, we again question whether the site is deliverable in the format currently being suggested or whether this will result in a major constraint to the development and therefore the number of homes being able to be delivered in this location.

Conclusion on the allocation at Wisloe

4.25 Consequently, we consider that there is an insufficient amount of evidence which underpins the allocation at Wisloe. The limited technical work prepared to date means that its allocation for 1,500 dwellings is unjustified and it cannot be said with any certainty that it can be delivered taking into account the various constraints that apply to the land. We are therefore of the opinion that this allocation should be removed from the Draft Local Plan Review.

Sharpness

4.26 Land at Sharpness is separated into two allocations – Sharpness Docks for 300 dwellings and Sharpness for 2,400 homes. As set out within the introduction we have concerns over the lack of technical evidence to date and the commercial viability of this allocation.

Sustainable Transport Links

4.27 Our primary concern relating to this allocation is the unsustainable location of the site, as highlighted in the evidence presented by Stagecoach buses as part of the Regulation 18 consultation to the Local Plan.

4.28 In particular we have picked up on the comments by them which state the following:

*"We have already made plain to the Councils, as a major rail and bus operator (including of tram and tram-trains) that **we see no business case for such links** [to Sharpness] principally because this very isolation means that they could not credibly offer enough residents a sufficiently attractive and relevant choice to begin to defray the very high fixed costs of operation, whatever delivery mode was used"...*

"As far as the Sharpness Branch Line is concerned, draft policy 5.1 goes as far only to state that the County will "protect the freight lane at Sharpness for future uses". This is no more practical value than the effective policy that the rail industry has had for the line for over 25 years... Simply put, improved services and facilities on the railway through Stroud District lie beyond the power of any local stakeholder to deliver, and there are no well-defined or funded rail industry plans at this time to bring any of the aspirations forward."

"Given the way that the railway has been a key articulating and structuring principle behind some major aspects of the Local Plan strategy, not least the new town at Sharpness Vale, justified until very recently by the claims that it could be sustainably be facilitated by the re-opening of the Sharpness Branch, this ought to give both the Councils pause for some very serious thought indeed".

"...We would be quite astonished if the GRIS has concluded that re-opening the Sharpness Branch line to passenger rail services will ever present a justifiable business case, especially when to do so would prejudice future capacity and frequency upgrades on the whole line between Bristol, Gloucester and beyond, serving a vastly wider range of potential trip demands".

4.29 The evidence presented by one of the key bus operators in the District is particularly damning and we have serious concerns over the credibility of Sharpness as an allocation if there is no bus operator willing to provide services to and from the area. The Sharpness Growth Point Transport Strategy undertaken on behalf of Green Square by Peter Brett Associates states that *'the provision of a comprehensive bus strategy will be vital to ensure the development*

at Sharpness encourages residents, employees and visitors to use sustainable development modes... it is likely that at least one new bus service will be required' (our emphasis). Without this therefore, it is our view that the proposals are unviable and will not adequately contribute to sustainable transport goals. As Stagecoach highlight, whilst Gloucestershire County Council may provide some services, these are "policy-driven rather than demand-driven service designs" (page 17 of their comments), meaning that they only provide very basic routes for essential needs, i.e. those that cannot drive a car. We therefore fail to see how the allocation of land at Sharpness will encourage sustainable transport provision and respond to the Climate Change Emergency.

Viability

- 4.30 In light of the above which in our view is significant and damning evidence that there will be no extensive bus provision at the site, we have also examined the general viability of the scheme at Sharpness in terms of other infrastructure provision. This includes the re-opening of the railway line for a regular service to Cam & Dursley and onwards to Gloucester, and localised road improvements.
- 4.31 We have already set out that there is a lack of jobs available at Cam & Dursley compared to economically active persons which will be exacerbated by the allocations proposed; therefore, it seems illogical to re-open the train line and focus on this connection when the key connectivity will need to be to larger settlements, such as Bristol, which is highlighted in the transport strategy report prepared by Peter Brett Associates.
- 4.32 The promoters of land at Sharpness only discuss localised road improvements as part of the development proposed, when, due to this lack of connectivity by rail to the settlements residents will actually need to travel to for work, will force them to travel via private car. This will exacerbate existing issues and create a significant strain on Junctions 13 and 14 of the M5, none of which appears to have been considered in the limited technical work undertaken to date.
- 4.33 There is also limited evidence to demonstrate that the re-opening of the rail line is feasible, in fact we note the following from the Network Rail representations submitted in January 2020 which state:

'It should be noted that whilst Network Rail is happy to work with the Council and developer to progress this, until the various feasibility studies have taken place, including how this would

fit within the timetable, we cannot guarantee this would be plausible. Should the provision of this service and station be feasible, this would be subject to third-party funding’.

- 4.34 This is significant and suggests that despite the proposals being a draft allocation since November 2018 there has been no progression on these discussions with Network Rail that gives us the confidence that the re-opening of this line is achievable. Their comments also highlight that this will be subject to third party funding; it is not clear whether this will be government funding or developer funded, again which causes significant concerns that the project may not be viable.
- 4.35 Within the Peter Brett Associates Sharpness Growth Point Transport Strategy prepared in 2017, which includes the vital evidence on the suggested infrastructure requirements for the development, they state that the following would be required:
- Upgrade the existing single track route, which is considered to be unsuitable for a regular passenger service and would require a full upgrade along the 6km length of track;
 - Re-establishing the Berkeley loop, which allows for trains to travel south to Bristol which would require a rail bridge over the A38 or a bridge to carry the A38 over the railway; and
 - A minimum of one new station to be located in the centre of the proposed development.
- 4.36 This is a significant level of infrastructure that will require many millions of pounds in investment and the proposals to date put forward by the promoters have only suggested that the line will be re-opened to Cam & Dursley. Peter Brett Associates stated that the above were minimum requirements; without the provision of a good quality rail network to Bristol and a commitment that the developers of this site will be able to fund it without causing viability concerns, including the provision of affordable housing, we fail to see how this is a sustainable option for growth.
- 4.37 We therefore consider that land at Sharpness should be removed as an allocation because there is little to no evidence demonstrating that the infrastructure required to make it sustainable will come to fruition and there is no viability evidence put forward by the developers of this site to suggest how the infrastructure will be paid for.

Moreton Valence

- 4.38 This site lies within close proximity to the initial plan review strategic allocation of land South of Hardwicke (G1) and the additional expansion to Hunts Grove (PS30). We have not seen any robust evidence to suggest that locating such a large amount of development in the same geographical area is commercially viable and will not lead to these various sites competing with each other to a degree that will slow delivery rates and potentially make the delivery of infrastructure to serve them difficult.
- 4.39 The development proposals for the Land to the South of Hardwicke (G1) are very well advanced and the site is supported by a detailed and fully informed constraints and opportunities plan, as well as illustrative masterplan options to demonstrate how the site could be sustainably developed. In addition, EIA Screening & Scoping has been submitted and a response from SDC has confirmed that an EIA is required. A planning application is currently being prepared; therefore, this site should remain in the plan.
- 4.40 The new proposed allocation at Moreton Valence (PGP2), which would compete with site G1, is not underpinned by any robust evidence and there is no technical information available as part of this consultation. This is the opposite to the Kingswood proposals which are accompanied by such information.
- 4.41 Separate to the issue relating to the absence of any underpinning technical work, we have the following concerns about site PGP2:
- The site is within multiple ownerships and it is our understanding that it is not associated with a developer, nor has it actively been promoted by a consortium of landowners to the Council in any co-ordinated or meaningful way. Development proposals for the site are therefore not well progressed.
 - The site represents a fragmented potential growth point, with intervening land in multiple ownerships severing the proposed site, and is not capable of being connected across all land parcels and therefore does not allow for a comprehensive development to be planned for or delivered.
 - The land is subject to both fluvial and surface water flood risk as figures 9 and 10 below show. NPPF policy (paragraph 155 in particular) requires that such areas should be avoided, and both the surface water and fluvial flow paths sever the site and exacerbate our concerns regarding connectivity and comprehensive development.

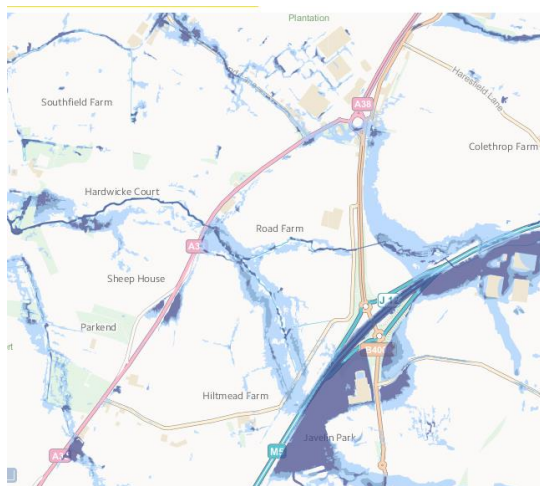


Figure 9. Extent of Surface Water Flooding

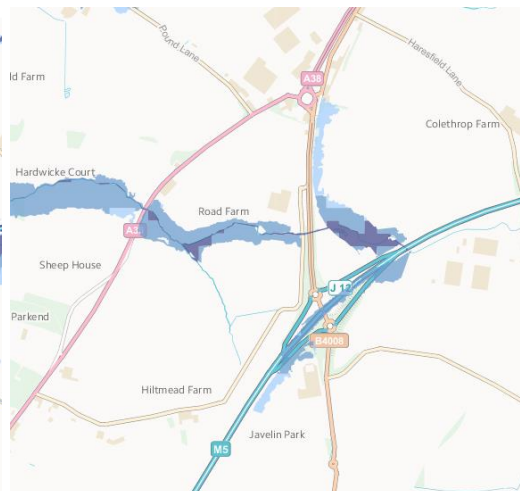


Figure 10. Extent of Fluvial Flooding

4.42 Therefore, we consider that site G1 should remain within the plan, but the removal of site PGP2 should be carefully considered.

Land south of Wickwar Road, Kingswood

4.43 Land south of Wickwar Road has been proposed for allocation within the Local Plan Review for 50 dwellings – an extract of the proposals are shown below in figure 11:



Figure 11. Extract of proposed allocation for land south of Wickwar Road, Kingswood (50 dwellings)

4.44 It is our view that both this site and the land controlled by Redrow Homes to the north should be allocated for development, to provide the critical mass required to greatly enhance the bus

operation services envisaged by Stagecoach within their representations, better linking Thornbury, Charfield, Kingswood and Wotton-under-Edge.

4.45 However, we do note Persimmon's most recent representations from January 2020 which seek to remove any provision of community benefits despite there being strong representations from both the Council and the Primary School which suggests that there is a strong need for additional primary school places in the area. To alleviate this Redrow Homes are happy to provide land for a new primary school within the site north of Charfield Road, which will address current and future capacity issues.

4.46 As such, we are of the view that whilst both sites are required and can address need for the Wotton cluster, if compared, land north of Charfield Road is a better option because it can deliver significant community benefits in terms of land for a two-form entry Primary School, which we will go on further to discuss in the next section.

5.0 THE WOTTON CLUSTER

5.1 As set out in the introduction the Wotton Cluster comprises the settlements of Wotton-under-Edge, Kingswood, North Nibley, Alderley, Hillesley & Tresham. It is our view that due to the extensive facilities and services provided within Wotton-under-Edge, it should be classified as a Tier 1 settlement in the hierarchy.

5.2 With consideration of the Role and Function Settlement Study undertaken by SDC in 2018, an extract of which is shown below, Wotton-under-Edge is easily comparable in terms of accessibility to services and facilities compared to those settlements which are put forward as Tier 1 (Stroud, Cam, Stonehouse and Dursley):

	Settlement size / size of population ^(a)		Number of dwellings- 2018 ^(b)	Proportionate housing growth 2011-18 ^(c)	Access to key services & facilities			Services & facilities ^(e)		Retail provision ^(h)		Employment Role ⁽ⁱ⁾	Local workers ^(j)	Local jobs ^(k)	Net importer or exporter of workers? ^(l)	Ratio of jobs : workers ^(m)
	Overall rating ^(d)	Driving score ^(e)			Bus / walk score ^(f)	Strategic	Local	Strategic	Local							
Stroud	LARGEST	11,944	5%	V.GOOD	0	1	V.STRONG	V.STRONG	STRONG	STRONG	yes	13,900	11,720	-2,180	0.84 : 1	
Cam	V.LARGE	4,021	10%	BEST	0	0	BASIC	V.STRONG	BASIC	STRONG	yes	4,180	1,980	-2,200	0.47 : 1	
Stonehouse	V.LARGE	3,443	5%	GOOD	0	3	STRONG	V.STRONG	STRONG	BASIC	yes	4,150	7,280	+3,130	1.75 : 1	
Dursley	V.LARGE	3,131	3%	BEST	0	0	V.STRONG	V.STRONG	STRONG	BASIC	yes	3,510	2,420	-1,090	0.69 : 1	
Nailsworth	V.LARGE	2,674	3%	GOOD	0	4	BASIC	V.STRONG	STRONG	BASIC	yes	3,060	2,380	-680	0.78 : 1	
Wotton Under Edge	V.LARGE	2,300	6%	V.GOOD	0	2	V.STRONG	V.STRONG	STRONG	BASIC	yes	2,590	1,370	-1,220	0.53 : 1	

Figure 12. Extract of SDC's Settlement Role and Function Study 2018 Update showing comparison of settlements in Tier 1 and Tier 2

5.3 It is unclear why Wotton-under-Edge remains a Tier 2 settlement when it clearly performs well in terms of accessibility and employment, which is highlighted in the report. A settlement can be considered within Tier 1 whilst also recognising that there are significant constraints to its development and it is important not to artificially constrain these areas and disregard the very important sustainability role they play.

5.4 It is acknowledged that Wotton-under-Edge is significantly constrained in terms of environmental, physical and topographical constraints, making expansion difficult, with the AONB providing the main constraints to growth here. It therefore seems reasonable to consider other settlements which have reasonable transport links to the facilities and services Wotton provides, and/or those within walking distance, such as Kingswood.

5.5 Kingswood is identified by SDC as a 'Tier 3a Accessible Settlement with Local Facilities' settlement. The draft Local Plan acknowledges that these are '*relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self-containment*', however then goes on to state that the strategy will seek to deliver lesser levels of development in this location.

5.6 This seems illogical when the previous representations undertaken by Boyer are taken into account. They have considered the accessibility of Kingswood as a settlement in paragraphs 4.24 – 4.45 of their representations in January 2020 utilising the evidence base prepared by SDC (the Stroud District Settlement Role and Function Study – Update 2018). They highlight the arbitrary assessment undertaken by SDC and shows that Kingswood, when considered properly in the context of nearby employment areas, performs highly in terms of accessibility and should be considered for further growth. The key points which we agree with in particular are as follows:

- Kingswood is identified as one of the best performing settlements, with a score rating of 'very good';
- Kingswood out performs the Tier 1 settlement of Stonehouse and a number of Tier 2 settlements, such as Nailsworth and Minchinhampton;
- The settlement is also one of the best performing in terms of access to employment;
- Distributing growth based on the amount of growth a settlement has previously received, is not a sound strategy for sustainable development – the work undertaken seems to indicate that Kingswood's growth has been restricted due to previously completed and committed development which equates to 16% growth over the last 10 years;
- Instead of constraining growth in these locations where there is already completed and committed development there should be a focus on providing the necessary infrastructure to ensure the settlement will be better self-contained and provide adequate links to sustainable transport;
- Aspects of the Settlement Role and Function Study appear to be flawed – with the Kingswood assessment ignoring the nearby Secondary School and the proximity of the Wotton Sport Centre; and
- Due to the constrained nature of Wotton-under-Edge, Kingswood should contribute towards the needs arising from this area.

5.7 The sustainability of the settlement is also highlighted by the Stagecoach representations, which we have referenced in the preceding sections of this report. They show the approach undertaken by SDC in terms of their assessment of accessibility is fundamentally flawed, ignoring the role and function of settlements and their interrelationship with one another – such as the case between Kingswood and Wotton-under-Edge. The above evidence leads us to consider that Wotton-under-Edge should be a Tier 1 settlement, with Kingswood proposed as a Tier 2 settlement, given its accessibility to a wide range of services and facilities, as well as its strong employment function.

5.8 As Boyer have stated in previous representations (paragraph 4.29), Kingswood has a strong economic role which has a net importer of workers (1.63 jobs per economically active residents), compared to other settlements in the District which see a net export of workers (as table 3 shows below which is an extract of data taken from Stroud’s Settlement Role and Function Paper Update 2018).

Table 3. Number of Jobs to economically active residents

Settlement	Ratio of Jobs : Workers
Stonehouse	1.75 : 1
Kingswood	1.63 : 1
Whitminster	1.41 : 1
Brimscombe	1.06 : 1
Eastington (Alkerton)	1.06 : 1
Frampton on Severn	1.04 : 1
Upton St Leonards	0.98 : 1
Minchinhampton	0.88 : 1
Stroud	0.84 : 1
Painswick	0.82 : 1
Nailsworth	0.78 : 1
Berkeley	0.72 : 1
Dursley	0.69 : 1
Newton & Sharpness	0.65 : 1
Chalford	0.56 : 1
Uley	0.56 : 1
Wotton-under-Edge	0.53 : 1
Hardwicke	0.51 : 1
Cam	0.47 : 1
Leonard Stanley	0.42 : 1
Kings Stanley	0.41 : 1
Whiteshill & Ruscombe	0.38 : 1
Manor Village (Bussage)	0.36 : 1

5.9 We therefore agree with the proposed allocation of land at Renishaw which seeks to expand employment provision, however, there needs to be complementary housing and infrastructure growth to respond to this planned expansion, to address the balance of net importation of workers to the area. Development here would reduce travel times and provide options for those already working in the area to live nearby.

- 5.10 Stagecoach appear to be supportive of development in locations such as Kingswood, commenting the following in their representations:

*"We would add a third lesser but important eastern limb leading from the A38 at Falfield across the M5a at junction 14 to Charfield within South Gloucestershire, before passing into the District West of Kingswood and passing a major employment focus at New Mills, before reaching the significant albeit rather smaller market town of Wotton-under-Edge. There are already significant flows along the route, followed by the B4509 and B4062/B4060. These relate to trips of varying lengths including to and from secondary and post-16 education, employment within the area and beyond it, and retail, leisure and other amenities. Whilst public transport along this corridor is today very limited in availability and relevance, **we had some time ago identified the significant potential that exists here to kick-start a greatly more attractive level of service, particularly if it could be catalysed and anchored by additional development on an appropriate scale". (our emphasis).***

"We have already agreed a costed strategy to improve the bus service between Thornbury, Charfield and Kingswood to every 30 minutes, extending beyond to Wotton, and potentially alternately every hour to Yate".

- 5.11 As the infrastructure has already been planned and costed, it would seem logical to leverage off the planned improvements and allocate development where there are already significant costed public transport improvements and existing employment provision in place. The alternative approach of seeking to create such improvements in an area like Sharpness, where providers such as Stagecoach have confirmed it would be unviable, is not a justified strategy and is therefore unsound.
- 5.12 Simply stating that Kingswood is a 'dormitory settlement' and then seek to constrain development on this basis is not a credible strategy for development, particularly with such a large and expanding employment site (Renishaw) within walking distance of the settlement. Allocations in this area would promote self-containment and address the imbalance of jobs to economically active residents evident this location.
- 5.13 In addition to this, we have also examined the provision of affordable housing across Stroud and in particular in the Wotton cluster; having studied this it is our view that the lack of delivery in Wotton-under-Edge in previous years and in future will have an impact on the ability to meet general market and affordable housing need in this location, which will in turn affect affordability.

5.14 The Parish Council's representations from January 2020 indicate the number of completions and commitments that have occurred in Wotton-under-Edge and Kingswood since 2011. An extract of these representations is shown below in figure 13.

	Wotton-under-Edge	Kingswood
2011 Total existing dwellings	2,192	542
Dwellings delivered 2011-2018	108	33
% increase 2011-2018	4.9%	6.1%
Total dwellings at 2018	2,300	575
Committed new dwellings (2018) ²	45	54
Total dwellings (2018) + commitments	2,345	629
Increase 2011-2018 (including commitments)	153 (6.98%)	87 (16.05%)
Additional dwellings proposed in Draft Local Plan	0	50
Total increase in dwellings 2011-2040	153 + 0= 153	87 + 50= 137
Total % increase 2011-2040	6.98%	25%

Figure 13. Extract of the Parish Council's representations which show number of completions over previous years (since 2011) and anticipated level of growth up to 2040

5.15 Whilst we acknowledge the Parish Council's concerns over the level of development occurring in Wotton-under-Edge and Kingswood, in our view this is proportionate given that Wotton should be a Tier 1 settlement and Kingswood a Tier 2 settlement and are suitable locations for growth.

5.16 Having reviewed the historic applications in Wotton-under-Edge since 2011 it is noted that the majority of these are 10 units and under, meaning that no affordable housing has been provided. We have been able to find three examples of major development sites in Wotton; however, as they have all been brownfield redevelopment opportunities - two were submitted with viability assessments which reduced the level of affordable housing provision to zero, with the third providing policy compliant levels. The reduction in affordable housing provision is not unsurprising given that brownfield sites are usually always associated with abnormal costs, including ground contamination problems, the need for demolition, or other issues such as asbestos.

5.17 We were able to find one further application for an affordable-led scheme of 8 units which was approved in 2019 (Application Ref: S.19/1054/FUL).

- 5.18 We therefore estimate that only 16 affordable homes have been either completed or are committed in Wotton-under-Edge since 2011; due to the settlement being surrounded by the AONB it seems very unlikely that there will be significant delivery of affordable homes in this location as delivery in this location will rely primarily on brownfield sites and windfalls of 10 units and under.
- 5.19 This is particularly concerning with consideration of the level of affordable housing need in Wotton-under-Edge; the Affordable Housing Team at Stroud has confirmed that as of December 2020 there are 237 applicants which have stated a preference for housing at this settlement on the Homeseeker Plus register. An important note to be made is that whilst this is a helpful indicator of need, the 'preference' figure is not likely to fully reflect the number of households seeking accommodation as not all people in housing need are registered with Homeseeker Plus.
- 5.20 This level of need is significant and if it can't be met within the confines of the settlement of Wotton-under-Edge (which is extremely likely given the planning constraints), housing needs to be delivered in an area which has a functional relationship with the town and which has available transport links to and from the settlement – such as at Kingswood. Greenfield development, such as the land north of Charfield Road, will be able to deliver 35% affordable housing in compliance with policy requirements due to its limited constraints.
- 5.21 It should also be noted that there is affordable housing need arising in Kingswood itself, equating to 72 applicants on the Homeseeker Plus register as of December 2020. This need also needs to be met albeit we recognise that some existing commitments will go some way to addressing this.
- 5.22 Accordingly, we consider further growth is required within the Wotton cluster to address the critical issue of a lack of affordable housing delivery in Wotton-under-Edge over the last 9 years. Given the constraints that affect Wotton itself some of this growth will need to be catered for at Kingswood, lying in very close proximity to Wotton and thereby well located to address some of the overspill housing need arising there.

6.0 **OUR PREFERRED SPATIAL OPTION – ANSWERS TO SPECIFIC QUESTIONS**

6.1 Taking the findings of the preceding sections of this statement, and the previous representations undertaken by Boyer Planning in support of the land at Charfield Road, we have set out our responses to the questions presented in the 'Additional Housing Options' consultation paper below.

Question 1 – Which strategy option(s) would you support, if additional housing land is required?

6.2 As set out, we commend SDC for taking a pragmatic approach to the increase in housing numbers that will arise from MHCLG's revisions to the proposed standardised method. We therefore consider that additional housing land is required.

Q1a – Option A Intensify

6.3 We have identified a range of factors that have not been properly considered in respect to some of the sites currently selected such as Wisloe and Sharpness (i.e. noise, utilities etc.) and can only accept such an approach where there has been technical work and a comprehensive masterplanning exercise carried out which demonstrates that an uplift in numbers is achievable without compromising the other objectives for the site, or resulting in adverse effects. We are aware that this has been achieved at emerging allocations such as Hardwicke and Stonehouse. Without this evidence, selecting this option would in effect be predetermining a strategy which is an unsound approach.

Q1b – Option B Towns and Villages

6.4 We support this approach but suggest it is combined with another in a 'blended' approach.

Q1c – Option C Additional Growth Point

6.5 We agree that a new growth point can be delivered but it needs to replace currently unsound options, such as Wisloe and Sharpness. We do not consider that there should be further provision over and above what is already proposed as otherwise the plan will rely too heavily on strategic-scale sites. It is our view that Whitminster is a credible location for such growth which we discuss in our other representations on behalf of Redrow Homes.

Q1d – Options D Wider Dispersal

- 6.6 We again broadly agree with this approach but suggest it is combined with another in a 'blended' approach.

Q1e – Would you support a hybrid / combination option?

- 6.7 Yes

Q1f – Can you suggest another strategy / spatial option for the identification of additional housing land?

- 6.8 See answers to Question 2.

Question 2 – If you answered yes to Q1e above, please explain which of the spatial options (A-D) you would like to see combined in a hybrid strategy, and why?

- 6.9 We consider that a blend of all options is the most appropriate, but in terms of allocating additional sites this should be on the edge of settlements which are sustainable and have access to everyday facilities and services, or have an interlinking role with another settlement nearby that provides supporting facilities and employment. Intensification of existing allocations can reasonably occur where there has been an evidence base and masterplanning undertaken to confirm this, such as at Stonehouse and Hardwicke.
- 6.10 Our views are that the strategy should involve the removal of land at Sharpness and Wisloe due to them being unsuitable locations for development which are not underpinned by technical evidence. These should be replaced with a single strategic allocation of land at Whitminster, supplemented by a significant number of non-strategic scale site allocations which can be delivered more quickly, ensuring a five-year housing land supply is maintained and addressing the balance in portfolio of sites. These smaller-scale allocations should include land north of Charfield Road, Kingswood, for reasons we have already and will go onto set out.

Question 3 – Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?

- 6.11 Yes, we agree with this approach, but the reserve capacity needs to be quantified. This ensures further competition in the market and builds-in flexibility in the plan in accordance with the NPPF, ensuring that the tests of soundness to be met and providing a strategy to meet the area's objectively assessed need.

Question 4 – Which strategy option(s) would you support, if a reserve site (or sites) is required?

- 6.12 We have answered this question underneath at Question 5.

Question 5 – If you answered yes to question Q4e above, please explain which of the spatial options (B – D) you would like to see combined in a hybrid strategy, and why?

- 6.13 For similar reasons to the above, we consider that a blend of all options is required, where there is sufficient evidence to demonstrate that the sites are credible and viable. This is to ensure there is in-built flexibility to the plan and to ensure that sufficient homes and other development will be delivered to meet objectively assessed need over the plan period.

Question 6 – What should trigger a reserve site (or sites) coming forward?

- **A delay in an allocated Local Plan site receiving planning permission?**
 - **Failure to deliver housing at the built rates set out in the Local Plan?**
 - **Another trigger**
- 6.14 It is our view that it should be a combination of the options above, plus if a 5YHLS deficit is found to occur. This will allow for a reserve site to quickly come forward to supply any deficiencies in the delivery of homes in the plan.
- 6.15 For example, if the trajectory assumes that an allocated site will start delivering homes in 2023, in our view if this site hasn't received full planning permission by 2022 a reserve site should be triggered to plug the gap.

Question 7 – Do you support or object to the development of the sites identified?

7a – BER016 Hook Street Farm, Berkeley

7b – BER017 Bevans Hill Farm, Berkeley

- 6.16 We support growth at Berkeley as a Local Service Centre which has significant facilities, services and employment available. We would refer readers to the representations undertaken by Avison Young in respect to specific allocations at Berkeley but agree with their comments that land controlled by Redrow Homes (SW) Ltd is the most suitable option for growth.

7c – HAR017 Land at Sellars Road, Hardwicke

- 6.17 We have no objections to the inclusion of this site given it is a small-scale development on the edge of an existing town which should easily be able to be delivered within five years and is likely to be built by a small to medium-scale housebuilder, which is supported by the NPPF.

7d – STR065 Beeches Green Health Centre

- 6.18 As it has been confirmed that the site is no longer required for operational reasons we support the loss of this health centre to make way for residential development and health and community uses on this brownfield site.

7e – Land south of Hyde Lane, Whitminster

- 6.19 We strongly support growth at Whitminster and would refer officers to our detailed representations on this site and the settlement in general. As set out in the Stagecoach representations Whitminster has been overlooked in terms of its ability to accommodate growth, its functional relationship with other settlements in terms of the provision of facilities and services and public transport links which are available in the area.

- 6.20 We consider that land north of Hyde Lane and west of the A38, controlled by Redrow Homes, is a suitable option for development and should also be considered alongside the other allocations being considered in this location.

Question 8 – Are there any other sites that you would like to be considered for future housing development?

- 6.21 We will go onto discuss the benefits of allocating land north of Charfield Road, Kingswood, in the next section of this statement.

Question 9 – Do you support or object to the development of the potential growth points identified, or any sites therein?

9a – PGP1 – Land at Grove End Farm, Whitminster

- 6.22 As set out we support growth at Whitminster given its sustainability credentials and links to the Transport Movement Corridor, which can be more easily enhanced than the infrastructure proposed at Sharpness. Development at Whitminster is supported by Stagecoach who are a major bus operator in the region, whereas they have confirmed there is no business case for extending service provision to Sharpness. This is compelling and damning evidence against this proposal.
- 6.23 For the reasons set out we suggest that both Wisloe and Sharpness are removed and replaced with strategic growth at Whitminster, the extent of which should be expanded to include land north of Hyde Lane.

9b – PGP2 – Broad location at Moreton Valence

- 6.24 We do not support this proposed allocation for the reasons described in paragraphs 4.38 – 4.41 of this document, in summary our concerns are:
- The site is within multiple ownerships and it is our understanding that the site is not associated with a developer, nor has it actively been promoted by a consortium of landowners to the Council in any co-ordinated or meaningful way. Development proposals for the site are therefore not well progressed.
 - The site represents a fragmented potential growth point, with intervening land in multiple ownerships severing the proposed site, and is not capable of being connected across all land parcels and therefore does not allow for a comprehensive development to be planned for or delivered.
 - The land is subject to both fluvial and surface water flood risk as figures 9 and 10 below show. NPPF policy (para 155 in particular) requires that such areas should be

avoided, and both the surface water and fluvial flow paths sever the site and exacerbate our concerns regarding connectivity and comprehensive development.

- No evidence has been prepared to demonstrate that providing another large source of supply in close proximity to two existing strategic allocations will not flood the market and lead to a delay in housing delivery.

Question 10 – Are there any other sites that you would like to be considered as a future growth point?

- 6.25 We do not consider that further growth points are needed in addition to Whitminster; in fact, the number of strategic sites should be reduced to avoid an overreliance on this source of supply that has acknowledged extensive lead in times and funding challenges. We consider that this should be supplemented by non-strategic sites such as land north of Charfield Road, Kingswood, which will be a sustainable enhancement of the existing settlement.

Question 11 – Do you have any comments to make about the Sustainability Appraisal that accompanies this consultation document?

- 6.26 We do not have any comments regarding the additional Sustainability Appraisal work which accompanies the consultation document; however, we have some concerns over the original documents in support of the Local Plan which seems to underestimate the lack of credible transport options available at Sharpness.

7.0 **LAND NORTH OF CHARFIELD ROAD, KINGSWOOD**

Introduction

7.1 Redrow Homes (SW) Ltd have a commercial agreement in place with the landowners of land north of Charfield Road. A site location plan is enclosed as Appendix A to this document and amounts to circa 23 hectares of land.

7.2 The site has been presented as part of representations made on behalf of Redrow Homes during previous consultation stages including the 'Draft Local Plan' consultation undertaken in January 2020.

7.3 The site comprises five parcels of agricultural land which are irregularly shaped and divided and bound by hedgerows. To the north-west is Renishaw, to the east are residential dwellings. Two bus stops lie on Charfield Road.

Accessibility

7.4 We consider that the development proposed at Charfield Road could form a sustainable extension to the village and provide the critical school infrastructure required to address the existing capacity issue cited by the Primary School itself and the Parish Council.

7.5 The site is well located and lies between the urban edge of Kingswood and the major employer Renishaw, which is allocated for further development of 10 hectares of land for commercial uses.

7.6 Kingswood itself contains a number of everyday facilities, including a convenience store, village hall, playing fields, primary school, churches, public house, MOT garage and car home. Katharine Lady Berkeley's Secondary School lies to the north-east, approximately 0.6km east of the site.

7.7 Beyond this to the north lies the settlement of Wotton-under-Edge, where there are a multitude of everyday facilities and services capable of meeting everyday needs. The site sits circa 2.3km walking distance to the centre of Wotton-under-Edge from the centre of the site, using main roads which have pavements. This is only marginally over the maximum walking distance that the CIHT guidance refers to (2km), and many facilities within Wotton lie within the 2km distance (swimming pool, secondary school and doctor's surgery).

- 7.8 As set out above, there are existing bus stops in proximity to the site which carry the 60, 63, 84, 85, 626, 860 and S8 bus routes, which provide regular services to Thornbury, Wotton-under-Edge, Charfield, Yate and Wickwar. The Stagecoach representations submitted earlier this year highlight the potential to expand and improve these services which already see a significant amount of traffic flow in this location with ease, with the strategy for improving this already agreed and costed.
- 7.9 Proportionate development in this location could therefore support, sustain and enhance existing facilities and services through the provision of the critical mass required to make a viable business case for enhancing and improving infrastructure.

Statutory Designations

- 7.10 The site lies adjacent to the development boundary of Kingswood but is not designated within the Green Belt, Flood Zone, Conservation Area, SSSI, AONB, Special Landscape Area, Air Quality Management Area or otherwise. The site is therefore unconstrained in terms of policy designations.

Historic Assessment of the Site

- 7.11 The site was assessed as part of the Strategic Assessment of Land Availability (SALA) in 2019 (Ref: KIN013). The site was rejected for the following reason:

"Site forms part of larger site previously assessed as KIN008. The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site including the visual setting of the listed Langford Mill House in a key view from Wotton Road. Development would extend the settlement form into the open vale countryside on higher ground and is inappropriate within the wider landscape. There are potential impacts therefore that would prevent sustainable development in this location".

- 7.12 We have considered this assessment in the following sections of our report. It should be noted that Redrow Homes have secured an agreement with the landowners to the west which results in a bigger parcel of land being available for development and which, if required, can overcome the issues raised above relating to landscape and heritage.

Landscape

- 7.13 As the proposed site lies adjacent to the established boundaries of Kingswood and has the potential to influence long range viewpoints from the AONB, the landscape impact of the development and the setting of the site has been an important consideration when considering the extent and form of development that is possible here.
- 7.14 Accordingly, landscape advice has informed the design process so far and this has been summarised in the Landscape Strategy document prepared by Pegasus which is provided in Appendix C.
- 7.15 The initial work set out a range of key recommendations that the development must adhere to in order to minimise landscape impacts to acceptable levels, these included:
- The development should be set within a landscape framework that works with the topography of the site and site context and provides a lower density edge to it, to provide an appropriate transition to the rural areas and AONB beyond;
 - Provide POS that breaks the mass of the development up and provides mitigating screening;
 - Carefully consider the nearby viewpoints, such as the PROW to the north and provide parkland areas that screen and filter views of the development;
 - Integrate SUDs into a POS scheme for the site that respects the current water-based infrastructure that serves the site;
 - Provide an appropriate landscape buffer to existing development in Kingswood, in particular in respect to the adjacent listed Langford Mill House building;
 - Utilise and integrate existing landscape features such as trees and hedges into the new proposed landscape strategy for the site; and
 - Propose the most extensive POS areas to the north of the site to provide an appropriate buffer between the site / Kingswood and the Renishaw employment site.
- 7.16 These recommendations have guided the emerging master plan proposals and the extent of the development footprint and its structure. Essentially the strategy now seeks to create a generous parkland setting around the housing development which 'bleeds' into the housing site via existing hedgerow and ditch corridors. Extensive planting is proposed within the parkland which will be multi-functional in making this area attractive and useable for all existing and new residents of Kingswood, greatly enhance the biodiversity value of the site

and visually break up and screen the development from key views nearby, and from the AONB.

- 7.17 The resulting landscape strategy plan is set out in figure 14 below and it is considered that if this is implemented the landscape and visual effects of the development will be acceptable and an attractive and useable new publicly accessible park provided for all residents, and nearby employees, to use.



Figure 14. Extract of the Landscape Strategy prepared by Pegasus

Highways

- 7.18 Accessibility has already been discussed above, however in terms of highways safety Paul Basham Associates (PBA) have assessed the potential access into the site including visibility splays and are comfortable that up to 350 dwellings can be delivered in this location (up to 350 was considered to allow for flexibility in case the proposals go over 300).
- 7.19 It is acknowledged that there are existing capacity issues at J14 of the M5; solutions are already been discussed to create a roundabout which will ensure there is reserve capacity to accommodate committed and future development. It is our view that further development in this location will capture obligations towards improving the junction which can be secured via s106 or CIL.

Flood Risk & Drainage

- 7.20 The site lies within Flood Zone 1 and is at low risk from flooding, as well as at a low risk from surface water flooding. As such soakaway testing will be undertaken to ascertain whether infiltration is possible across the site as a method of drainage, if not attenuation will be used and discharge to an existing outfall in close proximity to the site.

Ecology

- 7.21 A Phase 1 Ecological Assessment has been undertaken by Green Ecology for the land to the east in December 2019 and across the whole of the site in October 2020. This report accompanies these representations and can be found in Appendix E. The assessment however identified that there are limited ecological constraints to this land and additional surveys were required for birds, bats and reptiles (including Great Crested Newts) only. It has also been noted that a buffer to the stream to the north should also be incorporated to protect these habitats.
- 7.22 A minimum 10% net gain will be achieved on the site in line with Biodiversity Impact Assessment regulations and the conversion of sterile agricultural fields to more diverse parkland should be viewed as a significant benefit to biodiversity and ecology.

Heritage

- 7.23 We are aware of the Grade II Listed Building to the east of the application site known as the Landford Mill House. Whilst further technical work is underway the landscape strategy document prepared by Pegasus has considered this issue and proposed a significant planted buffer along the southern edge of the building to mitigate any potential impact of the proposed development on the setting of this asset. In light of the fact that the building was an old mill, we consider that the key setting and views to be retained are between this and the stream running along the northern boundary of the site.

Odour

- 7.24 The Kingswood Wastewater Treatment Works (WTW) lies to the north of the Redrow site. Therefore, the potential for odour to cause a negative impact on, and potentially preclude development, has been assessed by technical consultants Isopleth Ltd.

- 7.25 Their report is included as Appendix F to this document and the assessment undertaken used information provided by Wessex Water to consider the odour emissions from the WTW and produced a contour plan that models the potential impacts arising from the WTW.
- 7.26 The results of the assessment have identified that the average odour impact associated with the WTW is within acceptable parameters at all locations within the potential development site except for those closest to the WTW on the site's northern edge. These fringe areas of the site are to be proposed as parkland so no adverse effects on residents will occur.
- 7.27 In light of the assessment undertaken the presence of the WTW to the north of the site presents no constraint to the proposed development and would not result in any adverse impacts in relation to odour.

School Capacity

- 7.28 As set out in previous sections of this statement, we are aware of an existing school capacity issue at Kingswood Primary School, noted by both the Primary School itself and the Parish Council. Additional housing applications in this location have been objected to by Gloucestershire County Council (GCC) due to the lack of provision in this location. A separate note has been prepared by Mike Melton, who is an education property specialist, in relation to this issue. This can be found as Appendix G at the end of this report, however we have summarised this below for ease of reference:
- Kingswood Primary School (KPS) is already at capacity and there are future development sites in this location which will result in new children requiring a school place;
 - Due to existing land ownership constraints and physical constraints there is no possibility of expanding the existing school;
 - The best solution would be to relocate the existing school and provide land for a 2FE primary school which provides sufficient capacity should the school need to expand in future;
 - None of the other options for growth are currently committing to provide a primary school to address this issue;
 - This would allow for the currently anticipated deficit in places to be addressed on a more suitable site which can meet the guidelines on design for schools.
- 7.29 As various meetings the Parish Council has been considering a solution with GCC since the beginning of this year (2020). A number of options were considered at the January 2020

meeting, one of which determined that the minimum level of development required to fund a new 1FE village school would be to plan growth for 250 homes. It was noted at this meeting that without the potential to expand the 1FE school could be nearly full on completion, therefore ending up in the same position as currently. As such, if land for a 2FE were to be provided, this would give the flexibility to expand if and when required.

- 7.30 It is noted in the Public Meeting Minutes from the same meeting in January 2020 that the Head Teacher of Kingswood Primary School, Dan Johnson, urged local residents to consider the positives of planning gain from development, outlining that children were already being turned away and there is no room to expand.
- 7.31 The minutes also note that Kingswood local residents are opposed to any growth within their village, and had only selected the Persimmon site as it was the least amount of development.
- 7.32 Within the March 2020 meeting, GCC acknowledged that it would be logical to have a larger-scale development in the village which can contribute obligations. They have also stated that whilst they are unable to specify support for residential development, no other sites have been put forward as an option aside from the Redrow land to the north of Charfield Road.
- 7.33 The Sustainability Appraisal (SA) Report which accompanies the Draft Local Plan also highlights this issue and the impact this could have on sustainability objectives in this area. Paragraph 5.33 of the Report states:
- "In the Wotton-under-Edge area, new housing developments local to Kingswood Primary School should be monitored as there are short term capacity issues due to this school's site restrictions. There is likely to be a requirement to continue to hold discussions with developers to inform how they will make provision available locally. There may be primary school capacity within the wider planning area, at Wotton-under-Edge, however, this would require parents and children to travel out of Kingswood village for primary education".*
- 7.34 The evidence base has identified that there are also capacity issues at the schools in Wotton-under-Edge and this has been significantly downplayed in the SA Report that accompanies the plan.
- 7.35 This is therefore a critical issue which needs to be addressed now to avoid worsening capacity issues at KPS and resulting in primary school-aged children having to travel via bus or car to get to school each day. This is inappropriate and land north of Charfield Road can provide an immediate solution to this problem if allocated for development.

Proposed Development

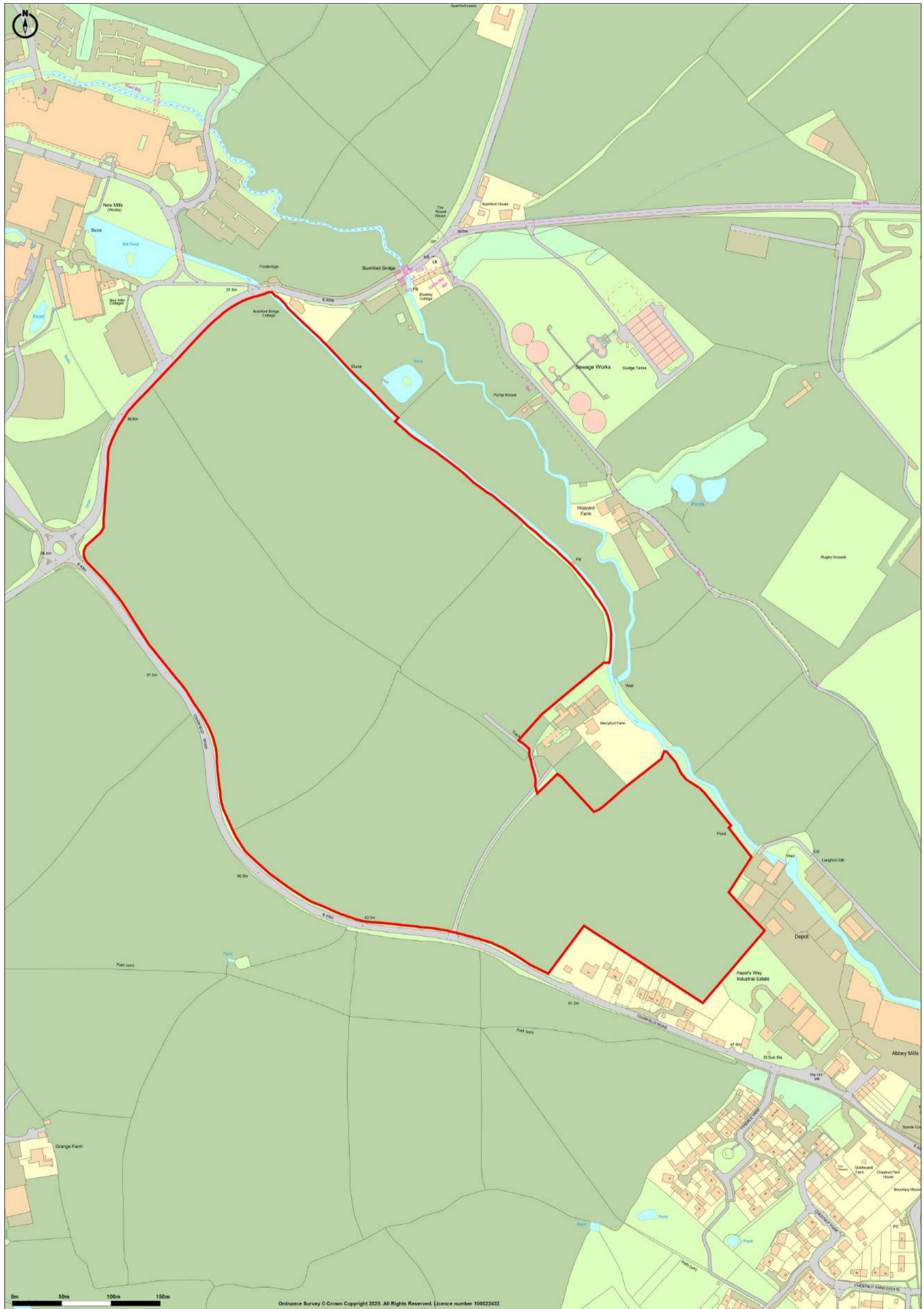
- 7.36 The technical work undertaken to date which is primarily landscape-led has informed and shaped the masterplan presented in the Vision Document which is enclosed with these representations in Appendix B.
- 7.37 The proposals can accommodate circa 300 dwellings, land for a 2FE primary school and extensive parkland / recreational opportunities on the site. The masterplanning of the site can also provide a direct pedestrian and cycle access to Renishaw out to the west, providing a more attractive route for non-car users than the current alternative along the main road.
- 7.38 The proposals will incorporate a mix of dwellings and policy compliant affordable housing to meet both Kingswood and Wotton-under-Edge's need, which is significant given the issues we have discussed in previous sections of this statement.

8.0 **CONCLUSION**

- 8.1 In summary, we consider that the current Local Plan strategy relies too heavily on strategic-scale sites which have little evidence to underpin them. In particular we have significant concerns over the evidence underpinning both Sharpness and Wisloe, and their ability to meet wider sustainability objectives.
- 8.2 It is our view that these allocations should be removed and allocations distributed in more sustainable and suitable locations, such as Kingswood, to provide supply to meet objectively assessed need for the Wotton cluster, which has seen little delivery over the last 10 years, and practically no new affordable housing.
- 8.3 These locations already have planned transport improvements which have been agreed and costed with a major bus operator, there will therefore be vast opportunities for alternatives to the private car to access everyday facilities, and in particular, major employment.
- 8.4 Redrow wholly support the allocation at Renishaw to expand the provision of employment land in this location, reducing out commuting and allowing a business to thrive. However, in conjunction with this, there needs to be proportionate housing growth to balance the number of jobs to economically active people in this location. This will give residents the opportunity to work and live in the same location, a significant benefit in transport and sustainability terms.
- 8.5 The land already allocated at Kingswood for only 50 dwellings is insufficient to match the number of people with jobs available in this area; furthermore the identified school capacity issue requires resolving according to the draft policy proposed. The land north of Charfield Road can provide a robust solution to this, with the masterplan easily accommodating a new two-form entry primary school. This addresses a significant existing issue in the area which has been acknowledged by plan makers and statutory consultees.
- 8.6 Technical work to date has not identified any significant constraints to the site's development, with the proposals underpinned by a landscape-led strategy to ensure there will be no adverse effects of the development.
- 8.7 With respect to the Additional Housing Options, we consider that a 'blend' of all the spatial options is the most appropriate but only where there is sufficient technical evidence underpinning the proposed allocations.

- 8.8 We consider that the provision of additional housing should be distributed across existing towns and villages at Tiers 2 – 4 (this is a blend of spatial options and could also be considered as 'dispersal'), with Sharpness and Wisloe removed, and replaced by a single strategic allocation at Whitminster.
- 8.9 We therefore conclude that land north of Charfield Road, Kingswood should be allocated for circa 300 dwellings, two-form entry primary school, and extensive parkland / recreation space, to achieve a mixed and balanced portfolio of sites in accordance with the NPPF as well as delivering homes in an accessible location adjacent to a major employer of Stroud District and in an area where there are already planned transport improvements.

APPENDIX A – SITE LOCATION PLAN



KEY

- First Property
- Second Property
- Ransom Strips

APPENDIX B – VISION DOCUMENT

Site Promotion Document

Charfield Road, Kingswood

Redrow Homes | January 2020





above: Redrow Homes development - 'A Better Way to Live.'

1. Introduction

This Site Promotion Document sets out a preliminary site analysis and a conceptual proposal for a sensitive residential development at land north of Charfield Road, Kingswood.

1.1 Summary

1.1.1 This document has been produced to inform discussions with local stakeholders regarding the opportunity for development at Charfield Road, Kingswood. It sets the background context for the proposal and shows why the site is suitable for residential development and a primary school.

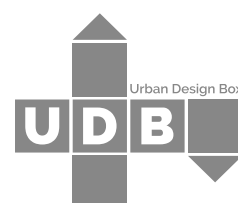
1.1.2 The site sits on the north west edge of Kingswood with the Renishaw employment site sitting to the north west of the site. The site comprises two parcels of land, either side of an existing private access road to Merryford Farm, and which are currently used as agricultural fields.

1.1.3 The proposal illustrated within this document has been developed with input from a number of technical consultants; preliminary technical evaluations and assessments have been undertaken for the site. This document sets out headlines of all these environmental and technical findings relating to the site and demonstrates the suitability of the site for development.

1.1.4 The document reviews the local context of Kingswood as a sustainable location for development and seeks to demonstrate how the development of this site can help deliver growth in a sustainable manner.

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2. Redrow Homes - A Better Way to Live

Redrow Homes is involved in numerous projects throughout the UK and aims to work with local communities to help deliver high quality developments that meet housing need and provide appropriate community infrastructure.

2.1 Homes by Design

2.1.1 We're dedicated to designing and building homes with character that people are proud to live in. Inspired by the past but designed for the future, the Heritage Collection offers the best of both worlds.

2.1.2 Redrow's Heritage Collection has been inspired by the 1930's Arts and Crafts era, brought up to date with designs to suit 21st century life. While the exteriors celebrate the very best of this classic style, most prevalent in the still much-admired character properties of the 1930s, the interiors boast modern features and a high specification to suit the way we live today.

2.2 Redrow 8 – Designing a better way to live

2.2.1 At Redrow we are committed to delivering thriving communities and creating better places to live. As part of this commitment we have developed the 'Redrow 8' – a set of placemaking principles for all of our developments.

“At Redrow, we build more than just homes; we create thriving communities. We provide what modern homebuyers want from their homes, neighbourhood and local environment.”





“Redrow creates a better place to live by putting customers’ expectations at the heart of our home designs.”

 **BUILDING RESPONSIBLY**

 **VALUING PEOPLE**

 **THRIVING COMMUNITIES**



3. Site Context

3.1 The site within Kingswood

3.1.1 Kingswood is located 2km to the south of Wotton-Under-Edge and 3.2km to the east of Charfield. The M5 motorway, via Junction 14, is located 6.5km to the west.

3.1.2 The 60, 63, 84, 85, 626, 860 and S8 bus routes run and stop along Charfield Road. These buses provide regular services to Thornbury, Wotton-Under-Edge, Charfield, Yate and Wickwar. The 85 bus provides a connection to the train station at Yate in 45 minutes.

3.1.3 The closest primary school to the site is Kingswood Primary School which is approximately 0.8km to the east. Katharine Lady Berkeley's Secondary School is a highly successful 11-18 mixed comprehensive and is located approximately 0.6km east of the site.

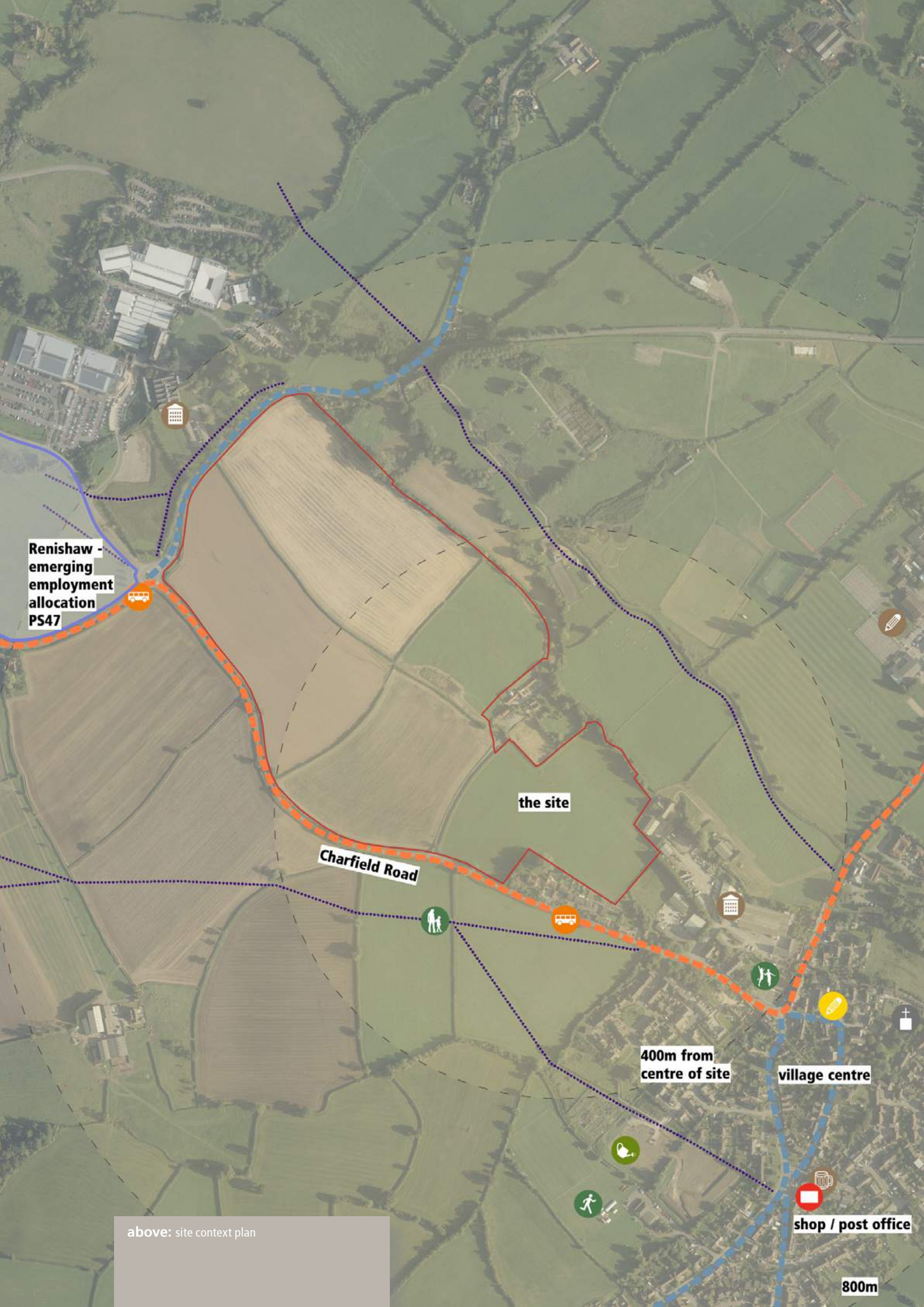
3.1.4 Kingswood has a village hall, a church, shops and a post office as well as a public house along Wickwar Road. There are two employment sites near the site: Renishaw immediately to the north-west; and The Abbey Business Park, immediately to the south east.

3.1.5 Langford Mill, a Grade II listed building, lies beyond the eastern boundary of the site; its context and setting should be considered in the development of the masterplan for the proposal. The site lies to the south (and outside) of the Cotswolds AONB.

3.1.6 The Stroud District Local Plan Review Draft Plan for Consultation (November 2019) proposes a further allocation for employment (PS47) north west of the site adjacent to the existing Renishaw site. The allocation would sit adjacent to the site and would provide a significant employment opportunity within walking distance of the site.

Local facilities

-  employment areas
-  place of worship
-  secondary education
-  primary education
-  village centre shop / post office
-  public house
-  local walking paths
-  allotments
-  sports pitches
-  sports facilities
-  300m walking distances from centre of site
-  Development boundary
-  Adjacent road network - principal routes
-  Nearby bus route
-  Emerging employment allocation PS47



Renishaw -
emerging
employment
allocation
PS47

the site

Charfield Road

400m from
centre of site

village centre

shop / post office

above: site context plan

800m

4. Background Technical Information

A full consultant team has been appointed to carry out initial technical and environmental surveys and reports which have informed the initial concept proposal for the site.

4.1 Transport

Proposed Vehicular Access

4.1.1 It is proposed that a vehicular access to the site would be provided by way of a priority 'give-way' junction taken from Charfield Road. This junction would be located approximately 60m to the east of the existing access lane leading to Merryford Farm.

4.1.2 The site access would likely take the form of a 5.5m carriageway, joining to Charfield Road with radii of 6.0m. A visibility splay of 2.4m x 160m would be provided and maintained to the west while a splay of 2.4 x 59m would be provided and maintained to the east from the proposed junction.

4.1.3 The proposed junction would provide access to both proposed development parcels, including the school. There is potential to create a new cycle link from Renishaw, to the north of the site, through the development and past the proposed primary school and then connecting towards the centre of the village to the south. There is potential to integrate any future potential strategic cycle routes using the site as an off road section of the route.

Internal Road Layout

4.1.4 The internal road network will be designed in line with the guidance provided in Manual for Streets and incorporate a new pedestrian route to the village via land to the south of the development. This pedestrian connection would promote walking and cycling through the creation of safe routes throughout the site.

4.1.5 The internal road layout would be designed to cater for the anticipated volume and type of trips on each link, as well as the number of dwellings accessed. Thus, it is likely that the internal road network for both parcels would be restricted to 20mph.

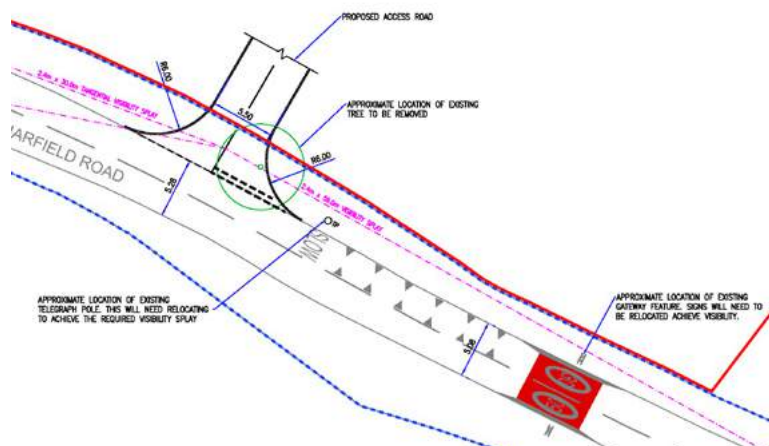
4.1.6 A high quality movement network which prioritises non-car users will contribute to the overall sustainability of the proposal.

Site Accessibility

4.1.7 The site is well-located to access the existing facilities and services in Kingswood, whilst a wider range of offerings lie within cycling distance. The site is located within walking distance of bus stops, which enjoy provision with regular services to Wotton-Under-Edge, Charfield and Yate, where there is a train station.

Development Trip Generation

4.1.8 Based on the preliminary assessment of the anticipated trip generation of the sites, it is reasonable to conclude that the development proposal will result in a low level of traffic generation, which is unlikely to have a material impact on the local highway network.



4.2 Flood Risk, Drainage and Utilities

4.2.1 A narrow corridor of fluvial and surface water flood risk (zone 2 and 3) has been identified along the two existing water courses shown on the constraints plan, located to the north and west of the site. The development proposal should take into account the existing flood zones, with no proposed residential dwellings located within areas of flood risk. No flood risk issues have been identified for the proposed site that would prevent development from coming forward.

4.2.2 Sustainable drainage features could be utilised to attenuate surface water from the proposed development, with infiltration methods the preferred option. It is proposed that flows from the development will be attenuated on site and discharged at a restricted pre-development rate.

4.3 Utilities

4.3.1 All necessary utilities are available at the site. It is proposed that the development will form connections to the existing apparatus within close proximity to the site to provide services.

4.3.2 Due to the small scale of the development, it is anticipated that the existing infrastructure will be capable of supplying the proposed development, subject to agreement with the appropriate utilities companies.

4.3.3 Based on the current information available, it is considered that the development proposal, in combination with the consideration of appropriate mitigation measures, would not give rise to any major adverse effects to the proposed site or the surrounding area.



left: Proposed access design with visibility splays (Paul Basham Associates) and

above: site boundary with the B4058 looking towards Kingswood, showing Charfield Road to the right

4.4 Landscape

Landscape Character Context

4.4.1 This greenfield site comprises an irregular shaped pocket of arable land. Boundaries of the site are vegetated on all sides.

4.4.2 Agricultural land and Merryford Farm border the site to the north, west and north-west. The edge of Kingswood adjoins the southern and eastern boundaries. A row of modern/post-industrial residential development overlooks the southern edge of the site. Abbey's Mills Industrial Estate is adjacent to the north-eastern edge of the site. The northern boundary has mature broad-leaf trees demarcating a waterway along the site's edge. On the north-east corner of the site, a listed building converted to residential borders the site's edge.

4.4.3 The land form of the site is gently sloping towards the AONB. The highest elevations on site reach c.49m above Ordnance Datum (AOD) and these levels are found closest to the existing houses on the southern boundary. The landform on site falls away to the north to lows of c.38 aOD.

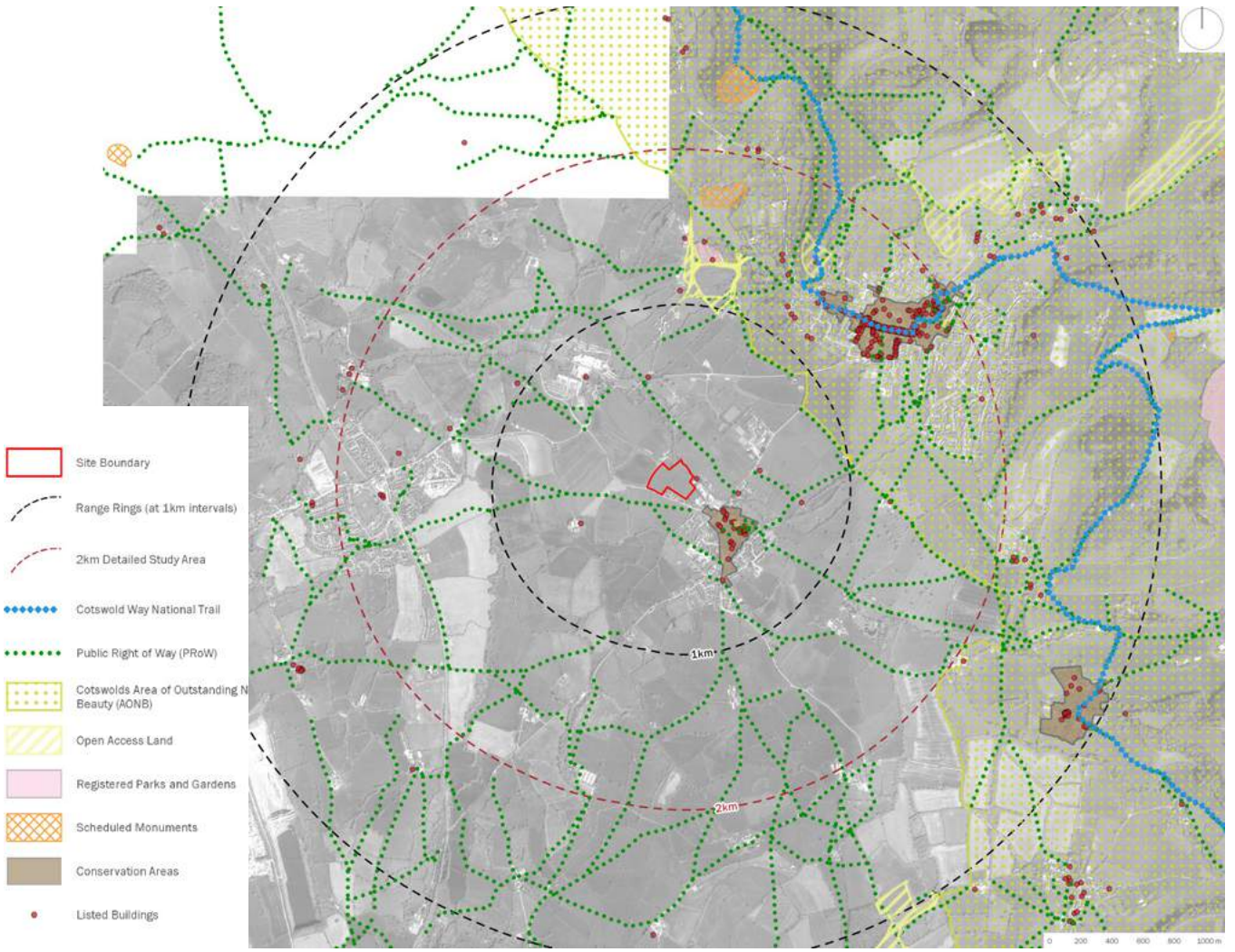
4.4.4 The character of the site is rural, and the sense of tranquillity is considered moderate; however, the settled context to the south and south-east reduces the sense of rural isolation and remoteness.

Visual Context

4.4.5 As the landscape of the site is open and the landform falls away to the north, views to the north and north-east towards escarpments in the Cotswolds AONB are available from within the site.

4.4.6 The site's location on the western edge of the settlement, adjacent to a mixed development edge which is modern for the most part, means that the site has the potential to integrate with the existing settlement when seen in wider views.





above right: Landscape related designations and Zone of Theoretical Visibility (EDP)

left: Private lane accessing Merryford Farm



Viewpoint 1:

View south from Wotton Hill and Cotswolds Way National Trail, taken from within the AONB.

Viewpoint 2:

View from William Tyndale Monument and the Cotswolds Way National Trail within the AONB, approximately 3.1km to the north-west of the site.



4.4.7 There are close range views of the site from PRoW to the north and south. Properties on the southern boundary have direct and mostly uninterrupted views of the site. The site is visible for about 150m from Charfield Road on approach to Kingswood from the north-west. Travelling in the opposite direction however, views of the site are more difficult to discern due to the existing built form on the site's edge, although filtered and fleeting views in between the properties on the southern edge are available.

4.4.8 As well as close range views, there are medium and long-distance views of the site from the north and north-east. Views from within the AONB are available. In these views the site is seen sloping towards the river, with the distinctive row of houses beyond the site in these views.

4.4.9 As part of the masterplanning for the site, long distance views of the development will be mitigated by tree belt planting and a landscape led masterplan approach.

4.4.10 From a landscape and visual perspective residential development could be accommodated within the site if consideration is given to the following Landscape recommendations.

Landscape Recommendations

4.4.11 In response to the desktop and fieldwork undertaken, the following conclusions and recommendations have been identified below.

- The layout of the site should seek to work with and reflect the site topography and site context. The site drains naturally to the northern edge and therefore this is a suitable location for sustainable attenuation features.
- A generous landscape strategy is necessary to mitigate any adverse effects on users of the PRoW and the visual amenity of recreational users of the Cotswolds AONB.
- The layout should be varied and ample space should ideally run east to west, with tree planting in between to break up the mass of the proposal.
- Designed views should be carefully considered to create views out of the proposed development, whilst reducing the views into the site. Proposed dwellings on the lower parts of the site should be low density to create a feathered edge, with views towards the AONB.
- Retain existing field boundaries and develop a long-term management plan.
- Maintain the discreet approach to Kingswood from the north-west using buffer planting and development well set back from the site's edges.



Above: View from public footpath looking south-west towards the site (EDP)

4.5 Ecology and Arboriculture

4.5.1 Preliminary survey work has not identified any major ecological constraints to development of the site and it is considered that the habitats of ecological value can be readily accommodated into a sensitively designed scheme. There remains ample opportunity for mitigation, compensation and enhancement measures through careful design, following the guidance below:

- No major constraints regarding loss of grassland, however biodiversity net gain required across the site.
- Ideally retained ditches buffered with 3m strip to protect from pollution and allow maintenance access.
- Retain and protect hedgerows. Replace any losses and provide 'net gain' in total hedgerow length.
- Design to include bat, bird and bug boxes to enhance site for wildlife.
- A 15m buffer is recommended from the stream to protect riparian vegetation, otter and water vole. Keep corridor dark and protect from pollution/excess water using SUDS.

4.6 Archaeology and Heritage

4.6.1 The site does not include any 'designated heritage assets', as defined in Annex 2 of the National Planning Policy Framework (NPPF), which would thus represent an 'in principle' constraint to development because of a presumption in favour of their physical retention.

4.6.2 Langford Mill, a Grade II listed building is present in close proximity to the north-east. Other listed buildings are present in the vicinity and have been noted in the site context plan.

4.6.3 Whilst those designated heritage assets in the wider landscape will require full consideration in due course, there is currently no reason to believe that any of them form a substantial constraint (if any) to site deliverability or site capacity.

Photo EDP 4 View from a public path looking south-west towards the site. The field in the middle ground contains the site and a listed building on the site's leading edge is seen in the centre of the view. Dwellings on Charfield road (bordering the site) are seen in the near background.





Above: Looking towards the water course from Charfield Road.

5. Site Features Plan

The adjacent plan provides a summary of the site's constraints, and opportunities drawn from the preceding technical work and plans. This sets a brief for the development of the following concept masterplan.

-  Development boundary
-  Potential all modes access
-  Potential pedestrian access
-  Potential connection to wider land
-  Existing pedestrian route
-  Adjacent road network - principal routes
-  Existing adjacent farm track
-  Potential new pedestrian link (alignment tbc)
-  Nearby bus route
-  Flood Zone (EA flood map for Planning)
-  Potential location for attenuation feature
-  Existing watercourse
-  Existing hedges
-  Existing trees / planting
-  Direction of downwards slope
-  Boundary to rear gardens
-  Adjacent buildings
-  Nearby key facilities
-  Nearby listed buildings
-  Emerging employment allocation PS47



Above: Site Features Plan.



6. Development Concept

The development concept opposite shows how the site could come forward for the delivery of 300 homes plus a primary school.

6.1 Development Strategy

CONTEXT - Development envelope:

- Proposed development envelope and strategic placement of streets and mews retains key views to the AONB (Wotton Hill and Westridge Woods), open views down and across Charfield Road and the employment centre's amenity.
- Existing green edge to stream corridor will be used for SUDS, informal recreation and biodiversity improvements.
- Setting to existing farm to be protected.

BUILT FORM AND IDENTITY - urban form:

- Centrally placed and well-connected school balances the proposed development and helps to integrate them better with the existing village.
- A two-step approach to densities (30d/ha closer to existing village and 20d/ha towards the employment centre) will help the development relate with the surrounding landscape, respecting existing amenity, openness and key views.
- Active frontages will be created onto the main street, stream corridor and areas of open space;
- Focal and corner buildings will help frame and punctuate the development, affording character and identify.

NATURE - landscape framework:

- Retention of most existing hedges and mature trees provide for biodiversity corridors across the development as well as informal play opportunities.
- Strategically placed new hedges and area of open space visually break up the development at its highest point and help to integrate it into the surrounding countryside.

- Proposed trees on the area of open space adjacent to the employment centre will help to create an informal green edge to the development as well as framed views from the employment centre and adjoining road/roundabout.
- A pocket park has been placed centrally to serve all residents and will include for informal play opportunities as well as a meeting and socialising place for the residents.

MOVEMENT - movement framework:

- The site will be accessed from Charfield Road which serves residential development and the school;
- The option of a further separate pedestrian access further east towards the village centre to create a safe walking route to the development is available;
- The exiting Sustrans cycle route will be extended into the site and beyond, connecting the village to the proposed school and employment centre, providing a safe and attractive cycling route for all.

Key:



site access road



pedestrian route



residential development



opportunity for focal building



existing / proposed planting



potential school building



Above: Development Concept

6. Conclusion

There is the opportunity for development of 300 homes as well as delivery of a new two-form entry primary school on the site north of Charfield Road.

6.1.1 The site could provide a variety of sizes of new homes, including affordable homes. Development of the site could also include a new primary school linked via a new cycle path to Kingswood and the employment centre.

6.1.2 The development will create a new public open spaces which would be accessible to both new and existing residents.

6.1.3 The development concept demonstrates a well connected and high quality place which respects and enhances the existing landscape and visual character as well as ecological features.



the site

Kingswood

above: The site within Kingswood

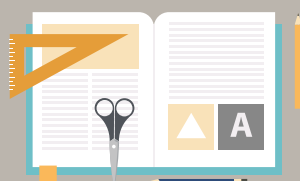


7. Key Benefits

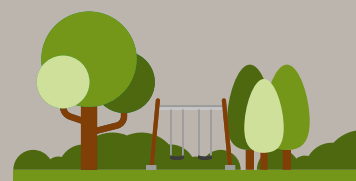
The site will provide a number of key benefits to Kingswood and Stroud District as a whole:



Mix of family homes, including affordable properties, thus increasing opportunities for home ownership in the local area



Potential for a new two form entry primary school to benefit existing and new residents



Access to open space for leisure and recreation, including children's play space and natural green space



New footpath created to link the development to Kingswood



Increased use of existing bus routes as a result of new residents travelling in the area



Potential cycle route within the site to connect Kingswood to the proposed school and existing employment area



Good links to the facilities in Kingswood and surrounding areas



The team are committed to the provision of high standard of design and construction enabling an enhanced residential amenity



Section 106 agreement and CIL opportunities to benefit Kingswood and Stroud District



The protection and enhancement of existing landscape features and biodiversity habitats



Increased spending in the locality as a result of new residents coming to the area



Employment opportunities including full time and supply chain jobs during the construction period

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