

Stroud Local Plan Review Emerging Strategy Paper November 2018

Land at Whaddon, Gloucester

Prepared by Black Box Planning
on behalf of Taylor Wimpey Strategic



Contents

1. Introduction	3
2. Policy Representations (Consultation Questions)	4

1. Introduction

- 1.1.** These representations to the Stroud Local Plan Review ‘Emerging Strategy’ consultation paper (November 2018) have been prepared by Black Box Planning on behalf of Taylor Wimpey Strategic. The representations have regard to Taylor Wimpey’s land interest at Whaddon. A site location plan is attached at **Appendix 1**.

- 1.2.** Taylor Wimpey welcome and support the preparation of the Stroud Local Plan Review and the expedient manner in which the District Council is conducting the review, following the adoption of the Stroud Local Plan in November 2015.

- 1.3.** Taylor Wimpey support the identification of land at Whaddon (G2) within the Emerging Strategy consultation paper as an option for development growth on the Gloucester fringe. However, for the reasons set within these representations, the Emerging Strategy should allocate the G2 site for up to 2,000 dwellings, as a cross boundary site that will help deliver the housing needs for both Stroud District and Gloucester City. The allocation of the site can provide both Stroud District and Gloucester City a degree of flexibility in housing delivery to help maintain a 5 year housing land supply position for both authorities.

- 1.4.** At this juncture, while the JCS authorities have embarked on the JCS review, there is the real possibility that the respective development plans will not align, and therefore at this stage it is appropriate for Stroud to allocate or safeguard Whaddon for housing until such time, that the JCS review is advanced sufficiently, to determine what proportion of the Whaddon site is required to deliver the unmet needs of Gloucester City, and as a consequence, what proportion of the Whaddon site could form part of Stroud District's housing requirement. The potential proportioning of the site will not be determined for some time, and therefore it is considered entirely appropriate to allocate or safeguard Whaddon for housing development in the Emerging Strategy.
- 1.5.** These representations illustrate how the site is entirely consistent with the established spatial strategies for both Stroud District Council and the JCS, and is inherently sustainable for development. These conclusions are underpinned by previous sustainability assessments of the site and the JCS Inspector analysis of the site during the examination of the adopted JCS.
- 1.6.** These representations comment with reference to the relevant consultation questions set out in the Emerging Strategy Consultation Paper. Throughout these representations, regard is had to the plan making policy of NPPF, including the application of the tests of soundness for the plan to be positively prepared, justified, effective and consistent with national policy.

2. Policy Representations (Consultation Questions)

Question 1.0a Have we identified the top 5 issues for you?

- 2.1. The identification of housing development as Issue 1 for the plan to address is supported, as it seeks to ensure housing is located where it can be supported by services and infrastructure to create sustainable development. The proximity of Whaddon to infrastructure, services and amenities associated with the immediately adjacent Gloucester urban area provides an inherently sustainable location for housing development in accordance with Issue 1.

Question 1.0b Do you agree with the ways we intend to tackle them?

- 2.2. The identified ways to tackle the issues are generally supported, however these are not clearly reflected in the Preferred Strategy growth allocations. The consultation paper states that the approach taken to tackle Issue 1 includes '**concentrating housing development at location where there is currently the best access to services, facilities, jobs and infrastructure**'. In this regard, land at Whaddon is sequentially preferable to other strategic sites, which are identified as part of the Preferred Strategy, but have very limited existing services, facilities and jobs and will require substantial infrastructure provision to deliver the allocated homes in these locations.
- 2.3. Strategic sites requiring substantial infrastructure investment are also more likely to be subjected to viability assessments and reduced affordable housing delivery, meaning they are not best suited to deliver Issue 5 of the consultation paper (affordable housing). It is therefore questionable whether the sites identified to meet the growth needs of the District in the Emerging Strategy provide a holistic solution to all the issues and objectives identified for the local plan review.

Question 2.3a Do you agree with the ways in which the emerging Strategy intends to meet local housing need?

- 2.4.** Taylor Wimpey generally support the approach taken to assessing the housing requirement, in so far as the calculation is based on the standard methodology set out Government's national planning guidance. The proposed minimum number of homes needed over the plan period at 638 dwellings per annum is therefore supported, but the preferred strategy should be reflective that this is the minimum requirement. The plan should be positively prepared and the opportunity to promote growth above and beyond the minimum requirement in the plan would bolster housing delivery across the plan period, thereby helping to ensure development control decisions are locally made and plan led. In this regard, land at Whaddon should be identified as an allocation with the proportion of housing numbers for Stroud District's needs pending further dialogue with Gloucester City.
- 2.5.** Regarding self-build plots, it is not appropriate or realistic to seek to allocate a proportion of self-build on larger scale allocated sites. Strategic development sites with a degree of conformity within an approved design code or design precedent, do not provide the appropriate or desired context for aspiring self-build homeowners. There is no evidence to demonstrate self-build plots are deliverable on strategic scale development sites. Self-build plots should only be sought on smaller scale or bespoke allocations for entirely self-build. Imposing a self-build plots policy of residential allocations will also hinder housing delivery and land which is otherwise suitable and available for residential development but under the control of housebuilders will become mothballed.

Question 2.3b Do you support an alternative approach or have we missed anything?

- 2.6.** Paragraph 59 of NPPF (July 2018) requires the planning system to significantly boost the supply of homes, so a housing growth target above and beyond the minimum requirement would provide a degree of boost as sought by Government. Further allocations beyond the minimum requirement would also provide flexibility in strategic policies in order to enhance prospects of housing delivery at a rate which maintains a robust 5-year housing land supply over the plan period.
- 2.7.** At this stage therefore, until such time that Gloucester City confirm the need for Whaddon to come forward under the duty to co-operate to address the unmet needs or future growth of the City, or otherwise, land at Whaddon should be allocated, or at least designated as 'safeguarded land' for residential development. This approach would provide appropriate flexibility for the Plan in the event that the City Council did not require Whaddon to come forward.
- 2.8.** Furthermore, the scale of Whaddon is such that the site could be proportioned between Stroud District and Gloucester City. For example, Whaddon could be allocated or safeguarded to provide 1,000 dwellings for Gloucester City and 1,000 dwellings for Stroud District, or any other appropriate split determined by dialogue with the JCS authorities.

Question 3.2a Do you agree with the Strategic Objectives as drafted?

- 2.9.** The housing element of Strategic Objective S01 should be more aspirational. The wording 'decent housing' gives the impression of mediocrity rather than higher standards of urban design, masterplanning, architecture and living space which the local planning authority should be seeking. Moreover, it is suggested the strategic objective should be to deliver quality homes to meet the full needs of the District and neighbouring authorities where appropriate.

- 2.10.** Strategic Objective SO4 relating to transport and travel is supported, but it is questioned whether this objective is best achieved with the strategic allocations identified in the Emerging Strategy, specifically at Sharpness and Wisloe. Are the proposed strategic allocations best positioned to provide homes near employment opportunities, shops, medical and other critical services, education and other amenities?

Question 4.2a Do you support the broad approach of the emerging growth strategy in terms of distributing the growth required by national policy for Stroud District?

- 2.11.** At the outset of the Emerging Strategy, Key Issue 1 is identified as ensuring housing development is located in the right place and supported by the right services and infrastructure to create sustainable development. On page 7 of the consultation paper, it is stated that Key Issue 1 is addressed by ensuring new housing development is concentrated in locations with best access to services, facilities, jobs and infrastructure. Taking this issue into account, and dovetailing it with Strategic Objective SO4 to promote sustainable travel patterns, it is not clear how the emerging strategy distribution of growth and particularly the proposed allocations at Sharpness and Wisloe correlate with these objectives.

Question 4.2b Do you support an alternative approach?

- 2.12.** The preferred strategy should be explicit that in the event that the JCS/Gloucester City confirm that land at Whaddon is not required to be allocated to meet the needs of The City, then land at Whaddon is part of the emerging strategy for Stroud district. Applying such status to land at Whaddon is entirely appropriate as it recognised as a sustainable location for growth and is fully compliant with the strategic objectives and issues which the Plan is seeking to address through its policies.

Question 4.2c Have we identified the right towns and villages for growth?

- 2.13.** By virtue of their location and limited existing social and environmental infrastructure, it is not clear how the proposed allocations at Sharpness and Wisloe fully deliver with the strategic objectives of the emerging strategy. Located on the urban edge of Gloucester City, land at Whaddon is sequentially preferable having regard to the three main strands of sustainable development.

Question 4.2d Do you support our approach to addressing Gloucester's housing needs?

- 2.14.** Yes, this is an essential matter for the Stroud Local Plan review to address having regard to the duty to co-operate in NPPF and for plans to be positively prepared.
- 2.15.** The identification of land at Whaddon as a site to address Gloucester's housing need is supported. The Council is in receipt of the Whaddon Vision Document which confirms the site is deliverable, suitable and sustainable for a residential led development. Furthermore, the site will deliver a new Park and Ride on the Stroud Road to promote more sustainable travel patterns and recognising the increasing level of commuting for work from Stroud District residents to Gloucester City. Whaddon is the most logical strategic development site without insurmountable constraints on the Gloucester urban edge.
- 2.16.** The sustainability of Whaddon was confirmed by the sustainability appraisal of the adopted local plan (2015) and subsequent views put forward by the JCS Inspector.
- 2.17.** The emerging strategy should not be hesitant that land at Whaddon (or part thereof) can contribute to the housing needs of Stroud District. Land at Whaddon is entirely consistent with the strategic objectives of the emerging strategy.

- 2.18.** In summarising the constraints and designations of the Whaddon site on page 78 of the Emerging Strategy, greater clarity should be provided with regard to the floodplain running through the centre of the site. Specifically, it should be acknowledged that this is only a small proportion of the site and that the promoter has identified potential for flood risk betterment utilising the watercourse within a large amenity park as demonstrated within the Vision Document.

Question 4.2e Do you support an alternative approach to addressing Gloucester's housing needs?

- 2.19.** No. Growth at south Gloucester and specifically at Whaddon is entirely unconstrained by any protective environmental designations. This is demonstrated within the submitted Vision Document confirming the site is suitable and sustainable for development, and importantly, it is deliverable within the plan period. Furthermore, update NPPF (July 2018) strengthens the sequential approach that should be taken to green belt release and exceptional circumstances, therefore hindering the prospect of additional green belt release north of the City being sound as part of the JCS review.

Question 4.3a Are any settlements in the wrong tier?

- 2.20.** Although the Emerging Strategy recognised the Gloucester fringe with potential allocations subject to further dialogue with the JCS authorities, the spatial strategy and settlement hierarchy for Stroud District should recognise the role and relationship of Gloucester City with the District. The District abuts the City, yet there is little explicit reference to the social and economic relationship, and the role of the City within the spatial strategy for the emerging strategy.

Question 5.0a Do you support the proposed mini-vision for your area (s)?

- 2.21.** With reference to the Draft Vision for the Gloucester fringe, the identification of the motorway as providing a distinct and defensible limit to southerly expansion of the Gloucester urban fringe is appropriate and supported.

Question The emerging Strategy identifies Whaddon as a possible site to meet Gloucester's needs. Do you agree?

- 2.22.** Yes, the site is sequentially preferable as the most sustainable strategy scale site in the District. This has been confirmed by the Council's SA (2015) and the recommendations of the JCS Inspector. The submitted Vision Document confirms there are no insurmountable constraints to the swift delivery of Whaddon in the plan period.

Question: Do you support development in Newtown/Sharpness in the following locations?

- 2.23.** No. It is not clear that the allocation of Newton/Sharpness best supports the strategic objectives of the plan as highlighted earlier in these representations.

Question: Do you support development at Wisloe in the following location?

- 2.24.** No. It is not clear that the allocation of Newton/Sharpness best supports the strategic objectives of the plan as highlighted earlier in these representations.