

REPRESENTATIONS TO THE STROUD LOCAL PLAN REVIEW – EMERGING STRATEGY PAPER (NOVEMBER 2018)

SITES IN STROUD DISTRICT

ON BEHALF OF ROBERT HITCHINS LTD



Pegasus Group

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT

T 01285 641717 | **F** 01285 642348 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

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INTRODUCTION AND KEY ISSUES

Representations are submitted on behalf of Robert Hitchins Ltd to the Regulation 18 Stroud Local Plan Review – Emerging Strategy Consultation (November 2018). The format of the representations reflects the questions asked on the Council’s online response system.

Representations are made on the following Cluster Areas and sites:

The Stonehouse Cluster

- PS19a – Land West of Stagholt Farm
- STO 006 – Land off Bristol Road, Stonehouse

Cam & Dursley Cluster

- PS21 – Tilsdown Cam

Severn Vale Cluster

- WHI 007 – Land at Grove End Farm, Whitminster
- WHI 001 – Land east of School Lane Whitminster
- WHI 005 – Land west of School Lane Whitminster

Representation is also made on the Sustainability Appraisal that accompanies the consultation.

1.0 KEY ISSUES

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

- 1.1 The top five issues identified focus on housing development, together with environment issues. Issue 1 should refer to housing and employment development being located in the “right place” supported by the “right” services and infrastructure to create sustainable infrastructure; as the bullets points under Issue 1 refer to both housing and employment development. Alternatively, Issue 1 should refer to “development” as any development should be located in the “right place” supported by the “right services” in order for it be sustainable and meet the objectives of the NPPF.

- 1.2 Whilst it is acknowledged that the issues need to be bespoke to the district they should respond to the NPPF in terms of sustainable development and reflect how the three overarching objectives are addressed in the Plan.
- 1.3 Transport is not identified as a separate issue; however, it is acknowledged that this cuts across all issues. Nevertheless, in achieving sustainable development this is a fundamental issue to be addressed.
- 1.4 The Council's top priority should be meeting housing needs of both the District and the Gloucestershire Housing Market Area (HMA) as a whole in accordance with the NPPF. There should be no mismatch between the Council's housing and economic growth priorities.
- 1.5 The Local Plan should aim to meet the objectively assessed development and infrastructure needs of the area, including unmet needs for neighbouring area where this is consistent with the NPPF.

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

- 1.6 The key issues for the Local Plan need to be addressed in the context provided by the NPPF and PPG.
- 1.7 The issues need to be addressed in an aspirational way, but at the same time being realistic in what they propose.
- 1.8 Pegasus object to the way in which the Local Plan review intends to address Key Issue 1 – Ensuring that new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development. It is considered that meeting the housing needs of the HMA is not well served by proposing a major allocation at Sharpness. Pegasus considers that there are significant deliverability issues at this location and consequently it will not assist in meeting Key Issue 1.

2.0 LOCAL ECONOMY AND JOBS

Question 2.1a - Do you agree with the ways in which the emerging Strategy intends to support the local economy and the creation of jobs?

- 2.1 The emerging Strategy for supporting local economic growth and the creation of jobs especially within the M5/A38 growth corridor and at locations in tandem with housing growth is supported.
- 2.2 The approach of providing new housing allocations at existing and proposed employment locations, including at Stonehouse and Cam, is also supported to help reduce the potential for further out commuting. It is also important to provide a range and choice of new employment sites of varying sizes and at locations to meet the specific locational requirements of different sectors. To some extent this will be led by the LEP and the Gloucestershire Industrial Strategy.
- 2.3 It is noted that the Council intend to work with other Gloucestershire Councils to undertake work to identify a future economic growth strategy for Gloucestershire and what this will mean in terms of employment policies and sites.

Question 2.1b - Do you support an alternative approach or have we missed anything?

- 2.4 No comment

Question 2.2a - Do you agree with the ways in which the emerging Strategy intends to support the District's town centres?

- 2.5 A more flexible approach to town centres is required. The NPPF is clear that in order to promote their long term vitality and viability - town centres need to be allowed to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, enabling a greater mix of uses and supporting the distinctive character of the city/town. Accordingly, planning policies should clarify 'the range of uses permitted in such locations, as part of a positive strategy for the future of each centre'.
- 2.6 It is noted that in response to these issues the plan proposes "*a more flexible planning policy framework, which prioritises retail uses within primary frontages but allows for a more diverse range of supporting uses in secondary areas.*"
- 2.7 The Stroud Local Plan will need to reflect the fact that national policy acknowledges the importance that residential development can play in enhancing

the vitality and viability of the centres and attempts to promote a variety of uses to ensure the long term future of centres. The retail market is changing and whilst the NPPF recognises this and the need for diversity, this needs to be addressed in Local Plans, rather than plans being overly prescriptive in defining the quantum of uses etc.

Question 2.2b - Do you support an alternative approach or have we missed anything? Please specify which town your comment(s) relates to.

2.8 No comment

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

2.9 The NPPF (2018) states that the development plan must include strategic policies to address the authority's priorities for the development and use of land in its area. Paragraph 19 of the NPPF states that:

"The development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particularly time."

2.10 It goes on to state in paragraph 20 that:

"Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for:"

2.11 Plans should also make explicit which policies are strategic.

2.12 With regard to the emerging strategy to meet housing needs attention is drawn to the requirement of paragraph 59 of the NPPF:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed..."

2.13 The NPPF (2018) makes provision at paragraph 60 for the use of the Standard Method for calculating the minimum local housing need for the purpose of plan making. The figure of 638 new homes per year is currently the correct minimum annual figure for meeting local housing need for the District (using 2014 household projections and 2017 affordability ratio), however this figure will be subject to change as new data is published on household formation rates and the affordability ratio, until the Local Plan Review is submitted for examination to the Planning Inspectorate.

- 2.14 It is possible therefore, that the figure of 638 dwellings per annum may increase. For example, as a result of the economic growth strategy referred to above, the Council may consider, if they wish, to pursue a strategy focusing on economic growth and full employment, consequently, an uplift would be required to support the District's economic growth assumptions. The standard method also does not provide for specific affordable housing requirements or the specific emerging needs of the elderly.
- 2.15 The outputs of the emerging Gloucestershire Local Housing Needs Assessment are currently awaited and will help to inform the next iteration of the Draft Local Plan. This evidence base document will provide further detail on any increase required over and above the standard method to help meet specific local housing needs.
- 2.16 The figure of 638 dwellings per annum is also a minimum figure to meet solely the growth needs of Stroud District, it does not account for any un-met need that may need to be accommodated within the District under the Duty to Co-operate with neighbouring authorities. Any un-met needs provided under the Duty to Co-operate should be added to the annualised housing need figure for Stroud District.
- 2.17 The NPPF (paragraph 23) requires that the strategic policies of the Local Plan, in this case the Stroud Local Plan Review, (SLPR) to identify a sufficient supply and mix of housing sites considering viability, suitability and economic viability, it is essential therefore that a range of greenfield and brownfield sites come forward as allocations in the draft plan in order to meet housing needs.
- 2.18 However, an overly strong emphasis on brownfield development may reduce the ability of the plan to deliver other policy aspirations such as affordable housing; green infrastructure or sustainable transport improvements owing to the cost of bringing forward such sites. Constraints such as contamination; heritage and flood risk have to date limited the amount of regeneration taking place at brownfield sites in the Stroud Valleys. While public subsidy from Homes England is beginning to facilitate such regeneration, these sites cannot be over-relied on by the Council as an effective source of supply to help meet local housing needs in the first five years of the plan.
- 2.19 In general, greenfield sites provide a more certain source of supply and while they too require the provision of new infrastructure, they can more readily deliver

the additional policy requirements of a development plan and are subject to rigorous viability assessment through a Local Plan Examination.

2.20 It is important that any emerging policy requiring the delivery of affordable homes on sites of more than 10 dwellings in urban areas or more than 5 dwellings in designated rural area is subject to rigorous viability assessment. Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. The cumulative burden of policy requirements should be set so that most sites are deliverable without further viability assessment negotiations in accordance with paragraph para 57 of the NPPF (2018).

2.21 Minimum dwellings sizes in accordance with National Space Standards can only be implemented as a policy if the requirements of paragraph 127 f) and footnote 42 of the NPPF (2018) are met. The NPPG sets out that:

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing” (ID: 56-020) (emphasis added)

2.22 The Council should, therefore, carefully consider impacts on need, viability and timing before introducing the National Space Standards.

2.23 With regard to the mix of dwelling types proposed the NPPF (2018) states at paragraph 31 that any housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned. The SLPR should ensure that suitable mix of sites are available to allow for the delivery of a wide range of development types across a wide choice of locations. It should not seek to be prescriptive with regard to specific housing mix through individual policies for each allocated site.

2.24 Attention is drawn to the need for any policy requiring the adoption of standards greater than those required by Part M of the Building Regulations Category 1 (to which all new homes are built) to be applied only in accordance with NPPF paragraph 127 f) and Footnote 42. Adopting higher optional technical standards for accessible and adaptable homes (Category 2 and Category 3) should only occur to address a clearly evidenced need and where their impact on viability has been considered. Should the Council wish to pursue this option then it will need to

provide local assessments evidencing the case for Stroud to adopt the higher optional technical standards.

- 2.25 An objection is made to the emerging policy direction of allocated Local Plan housing sites providing a proportion of self-build plots. Most self-builders are not interested in plots within large housing sites. The allocation of such plots within larger sites can frustrate the delivery of allocations. There are the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. There is the loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt.
- 2.26 As set out in the NPPG (ID 2a-021) the Council should fully assess the demand from people wishing to build their own homes by collating data from reliable local information (including the number of validated registrations on the Councils Self / Custom Build Registers). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on larger housing sites.
- 2.27 It is considered that the approach should be to allocate a number of small sites specifically for the self-builder and allow such plots to come forward as rural exceptions.
- 2.28 For the purposes of five - year housing land supply it will be necessary for the Local Plan to identify those sites that can deliver new homes in the first five years of the plan. There is far less certainty over the delivery of self-build plots, which by their very nature are dependent on time and financial resources for completion, than sites that are delivered by small, medium sized and regional housebuilders.
- 2.29 Plots identified for self-build would effectively be removed from the five-year housing land supply. The NPPG requires Council's to fully assess need for self-build from their online Self/Custom Build Register. The type of sites requested for self-build should also be considered in any emerging policy position as very often demand is for single plots in rural locations.
- 2.30 Our client draws attention to the requirements of paragraph 68 a) of the NPPF (2018) which requires local planning authorities to:

“identify through the development plan and brownfield registers land to accommodate at least 10% of their housing requirement on sites of no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% cannot be achieved;”

- 2.31 To that end the identification of site PS21 Land adjacent to Tiltdown House as a proposed development site is particularly supported (May 2017 SALA ref CAM008). The site comprises 0.8ha and is situated within the existing Settlement Development boundary of Cam. Further details on the deliverability of the site are provided in Section 5 of these representations.

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

- 2.32 In general, the Council’s approach is supported, however there will be a need for the Council’s objectively assessed housing need to be continually reviewed until the submission of the Local Plan; prior to that the outcomes of the Gloucestershire Local Housing Needs Assessment will need to be taken into consideration in the emerging Draft Local Plan.
- 2.33 There will also be a need for range of type and mix of sites to be allocated in the plan to ensure that a range of types of housing products are delivered to meet the demands of the open housing market and the affordable and specialist needs of the District up to 2040.
- 2.34 It is considered that the proposed new community at Sharpness cannot be part of an approach that successfully delivers a sustainable strategy. Due to the level of environmental designations and constraints in and around the proposed development area, which will require extensive mitigation, this will have a significant impact on viability and hence deliverability of the proposal. In turn this may also impact on the ability of this proposed development to deliver other policy requirements of the plan. In contrast other locations along the A38 such as Whitminster are not constrained (page 86 of the consultation document) and its development would be consistent with the overall economic strategy in the SEP and transport infrastructure is/or can readily be provided.
- 2.35 The District will also need to evidence a five-year supply of housing land plus a buffer in accordance with the requirements of the NPPF. The Council may need to consider the allocation of additional housing sites at sustainable locations with good access to the A38/M5 corridor, such as those at Whitminster (see Section 5)

promoted by our client. There will be more certainty over delivery from a larger number of sites at various sustainable locations which can be delivered by small, medium or regional housebuilders than from a reduced number of large strategic sites where delivery could easily be affected by delays in infrastructure provision, viability or structural changes to the UK housing market or economic conditions.

Question 2.4a - Do you agree with the ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?

- 2.36 The emerging approach to Local Green Space and community provision in the SLPR, is generally supported, however caution is expressed that all policy approaches must be viable in terms of delivery and not have an adverse impact on other policy requirements of the plan, such as the delivery of affordable housing.

Question 2.4b - Do you support an alternative approach or have we missed anything?

- 2.37 No comment

3.0 A VISION FOR THE FUTURE

Question 3.1a - Do you agree with the vision for 2040 as drafted?

- 3.1 It is noted that there are only some minor wording changes to the current Local Plan vision. The amended Vision for the plan to 2040 is supported. The vision for the Local Plan needs to be rolled forward to correspond with the plan period and consider issues that are likely to affect the location of development and the movement of people in order to achieve sustainable development.
- 3.2 The plan period to 2040 is supported, but there is no reference to the Duty to Cooperate of Statements of Common Ground.

Question 3.1b - Do you support an alternative approach or have we missed anything?

- 3.3 No comment.

Question 3.2a - Do you agree with the strategic objectives as drafted?

- 3.4 Having compared the strategic objectives with those in the adopted Local Plan there is very little change. The strategic objectives are supported.

Question 3.2b - Do you support an alternative approach or have we missed anything?

- 3.5 No comment.

4.0 EMERGING STRATEGY

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?

4.1 Since that last consultation on the Issues and Options the new NPPF has been published and this places a greater emphasis on plan making and the distinction between strategic policies and non-strategic policies. The NPPF (2018) states that the development plan must include strategic policies to address the authority's priorities for the development and use of land in its area. Paragraph 19 of the NPPF states that:

"The development plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particularly time."

4.2 It goes on to state in paragraph 20 that:

"Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for:"

4.3 Plans should also make explicit which policies are strategic policies, where a single plan is prepared the non-strategic policies should be clearly distinguishable from the strategic policies.

4.4 The strategic policies should be limited to those that are needed to address the strategic priorities of the area (and any relevant cross boundary issues) in order to provide a clear starting point for any non-strategic policies that are needed.

4.5 The strategic policies will need to anticipate and respond to long term requirements and opportunities.

4.6 Paragraph 23 states:

"...Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or nonstrategic policies)¹⁵ .

4.7 Pegasus submitted representations in response to the previous consultation on the Issues and Options and broadly supported a continuation of the current

strategy in the adopted Local Plan, i.e. allocating housing and employment needs to edge of Cam, south of Gloucester, and at Stonehouse, given the benefits of locating new residents close to places with facilities and services and where there are employment opportunities.

- 4.8 It is noted that the four options included in Issues and Options have since been subject to a Sustainability Appraisal and assessed against 17 sustainability objectives. The four options have also been subject to a high level transport assessment. In order for a strategy to emerge consideration has also been given to the future roles and functions of each of the main towns and villages in the district in order to determine which places can support future growth; to determine which settlements perform an important role in terms of the provision of employment opportunities, which settlements have a range of facilities and services, and which benefit from transport other than the private car. Sites have been considered from the SALA and their deliverability assessed. This has led to the emerging strategy.
- 4.9 The emerging strategy proposes to concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is the best access to services, facilities, jobs and infrastructure. This approach is supported and is consistent with the NPPF and the achievement of sustainable development.
- 4.10 However, it is noted that the emerging strategy also proposes housing and employment growth to be centred on two new settlements at Sharpness and at Wisloe within the Berkeley Cluster and the Severn Vale Cluster respectively, (A38/M5 corridor) in order to create new sustainable communities along the garden village principles.
- 4.11 In terms of Sharpness the area has a long history, a site was allocated for 300 dwellings in the adopted local plan, but has yet to come forward for development. Furthermore, it is not clear what the demand is for businesses to locate at Sharpness, as the Strategic Economic Plan focuses on the M5 around junctions 9, 10, 11 and 13. The Local Enterprise Partnership is in the process of reviewing and updating its Strategic Economic Plan (SEP) and producing an Industrial Strategy.
- 4.12 To some extent proposing significant development which is not consistent with the current SEP is a high risk strategy and pre-judges further work, in particular the Industrial Strategy and other aspects of the evidence base such as the Landscape Sensitivity Assessment.

4.13 In respect of a new settlement at Wisloe comprising 1,500 dwellings, 5 ha employment land, retail, community uses and open space, this area lies between the M5 and the A38, to the south of Cambridge and east of Slimbridge, the A38 provides a barrier to further growth. This scale of development is at the minimum considered in the MHCLG Garden Communities Prospectus (August 2018) i.e. (1,500 – 10,000 homes). Whilst MHCLG indicate that consideration will be given to smaller proposals they need to be *“particularly strong in other aspects. For instance, demonstrating exceptional quality or innovations, development on predominantly brownfield sites, being in an area of particularly high housing demand, or ability to expand substantially further in the future.”*

4.14 Paragraph 6 of the MHCLG prospectus states that:

“All proposals must be of sufficient scale to be largely self-sustaining and genuinely mixed use as per paragraphs 13 b and c.”

4.15 There are principal physical constraints, e.g. the floodplain on the north eastern edge of the area adjacent to Cambridge and the proximity to the M5 to the east. This area has not been considered in the district’s Landscape Sensitivity Assessment (2016). A settlement of 1,500 dwellings cannot be considered as self-sustaining and its future expansion appears to be constrained by the floodplain to the north, the A38 to the west, the M5 to the east and the railway line to the south.

4.16 Pegasus object to further development at Sharpness and the proposed garden village at Wisloe.

4.17 It is considered that if the significant boost in housing supply is required (it is noted that the housing requirement for Stroud has increased from the figure in current Local Plan of 456 homes per year to a minimum of 638 homes per year), then the strategy needs to reflect a combination of Option 1 i.e. the current plan of concentrating development at a few large sites, located adjacent to the District’s main towns, combined with small sites/windfalls at settlements in Tier 1 – 3 of the settlement hierarchy; and Option 2 medium sized housing and employment development on the edge of larger villages as well as the towns.

Question 4.2b - Do you support an alternative approach?

- 4.18 Pegasus object to further development over and above the current local plan allocations at Sharpness. It is considered that irrespective of whether a new community at Sharpness is viable, its delivery is going to be inferior to sites better located to centres of population. Consequently reliance on this site places a high risk on delivery. Pegasus also object to the proposal for a new settlement/garden village at Wisloe.
- 4.19 Pegasus consider that development should take place at Whitminster near junction 13 of the M5, this strategy is consistent with the SEP. Land at Grove End Farm Whitminster is proposed for a mixed use development comprising commercial/employment and residential uses. Further sites at Whitminster, i.e. land east of School Lane and land west of School Lane. Whitminster is very well placed on the north/south A38/M5 corridor and the east/west A419 route to meet housing needs arising both within and beyond the District (see Appendix 4 for location plan). This is addressed in more detail in response to Question 5.

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

Are any settlements potentially unsuitable for growth?

- 4.20 See response to Question 4.2a. Land at Whitminster (as proposed in Section 5) is a settlement that is suitable to receive growth in the emerging SLPR, the reasoning is explained further in the response at Section 5.

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

- 4.21 Addressing of Gloucester's housing needs should be an integral part of the Stroud LPR. To fully meet the Duty to Co-operate Stroud District Council should engage on a constructive, active and on-going basis with neighbouring authorities to maximise the effectiveness of the Plan. The NPPF states that authorities should produce, maintain and update Statements of Common Ground, throughout the plan making process. It is noted that the intention is to prepare an assessment of potential alternative sites to meet Gloucester's long term housing needs in 2019. This evidence it is assumed will then inform the final Draft Plan consultation in the autumn of 2019.

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

4.22 No comment

Our towns and villages/Settlement Hierarchy

Settlement Hierarchy

Question 4.3a - Are any settlements in the wrong tier?

4.23 It is noted that the Settlement Role and Function Study has been updated in 2018, however, this study appears to be a review of the current position, it does not include any analysis of the potential of settlements to accommodate future growth, for example if a settlement was to significantly expand would this be an appropriate strategy?

4.24 It is not clear what the justification is for Painswick moving from a Tier 3 settlement to Tier 2 given that the Sustainability Appraisal states at paragraph 6.87 that it has been identified as having:

“high sensitivity to employment or residential development.”

4.25 Paragraph 1.6 of the Sustainability Appraisal states:

“Much of the land in the eastern portion of the District beyond the more sizeable settlements falls within the Cotswolds Area of Outstanding Natural Beauty (AONB) which has been designated in recognition of its rich, diverse and high quality landscape. Significant areas of land at the Severn Estuary have been designated as a Special Protection Area (SPA), a Special Area of Conservation (SAC) and a Ramsar site and these areas fall partly within the boundaries of the District to the south west. Additional important biodiversity sites in the District include Cotswold Commons and Beechwoods National Nature Reserve (NNR) and Cotswold Beechwoods SAC both of which are in close proximity to Painswick and Rodborough Common SAC immediately to the south of Stroud.”

4.26 An objection is therefore made to the proposal to move Painswick from a Tier 3 to a Tier 2 settlement.

4.27 Whitminster is a Tier 3a settlement which is well located and accessible and benefits from proximity to higher order settlements. Whitminster provides a range of facilities and services, including a primary school, pubs, restaurants,

convenience stores, village hall and is served by a regular bus service. Given its location and proximity to the M5 it is accessible and attractive to the market. Given the availability of land suitable for development and its facilities and services it has the potential to be a Tier 2 settlement in the emerging local plan.

Question 4.3b - Do you support the proposed approach to managing development at small Tier 4 and 5 settlements by including them within the hierarchy and defining Settlement Development Limits? Or do you support an alternative approach of simply treating them as 'open countryside' or is there another alternative?

4.28 No comment

Question 4.3c - Do you support the idea that the Local Plan should seek to manage the cumulative impacts of growth on individual settlements? How should we develop a policy framework to achieve this?

4.29 No comment.

Settlement Development Limits

Question 4.4a - Do you support the emerging Strategy approach towards maintaining settlement development limits?

4.30 The approach proposed in the emerging strategy is one where housing and employment and community uses will be accommodated within existing settlement development limits. It is noted that the development limits will be updated to reflect physical changes since they were last reviewed and to better reflect their intended function. Some limited development beyond settlement limits is acceptable subject to satisfying detailed environmental and design criteria. This is similar to the current approach in Policy CP2.

4.31 It is considered that settlement development limits should be reviewed to provide enough opportunities to meet identified housing needs in full.

4.32 The Local Plan Review should avoid an overly prescriptive inflexible approach to development proposals on the edge of towns and villages given the likely necessity to meet a higher housing requirement in the future.

4.33 This was an issue discussed at the last Local Plan Examination. The NPPF and PPG are clear that all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing

development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. Rural housing is essential to ensure viable use of local facilities such as retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship.

- 4.34 Settlement boundaries have commonly been used as a planning tool to limit development, but the opportunity exists to manage and deliver change by community agreement through the Local Plan and the Neighbourhood Plan process.

Question 4.4b - Do you support an alternative approach?

- 4.35 No further comments.

Question 4.4c - Do you support the proposals to allow some limited development beyond development limits as set out on page 32 of the emerging Strategy?

- 4.36 The proposal to allow development beyond settlement development limits is supported, this provides a degree of flexibility to the housing land supply.

Question 4.4d -Do you support an alternative approach?

- 4.37 No comments.

Question 4.4e - Do you support the specific changes to existing settlement development limits?

- 4.38 No comments. The settlement boundaries should be updated to reflect the allocated sites in the adopted Local Plan.

Question 4.4f - Do you support any other changes to settlement development limits, not listed in Appendix A?

- 4.39 No comments.

5.0 MINI VISIONS AND PRIORITIES

THE STONEHOUSE CLUSTER

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

- 5.1 The Draft mini vision for the Stonehouse Cluster is supported.
- 5.2 Pegasus supports the identification of Stonehouse as a Tier 1 settlement in the emerging SLPR. It is a sustainable and suitable Tier 1 settlement location at which housing needs can be met. The 'very important employment role' of Stonehouse to the Stroud economy is acknowledged with its sustainable transport linkages to Stroud, Swindon, Gloucester and beyond via the railway network. As a settlement with excellent access to both sustainable transport infrastructure and the strategic road network, situated at junction 13 of the M5, the Tier 1 settlement is well placed to enable the District to meet its economic growth objectives.
- 5.3 A number of potential sites for development are identified in the emerging strategy. The majority of land within PS19a North /Northwest of Stonehouse has been promoted by Pegasus on behalf of Robert Hitchins Limited. Whilst the principle of development in this location is supported, an objection is made to the capacity of 680 dwellings for PS19a which is for a larger site than promoted by Robert Hitchins Limited. Land at west of Stagholt Farm was promoted for 800 dwellings and mixed use development and comprises a smaller site than identified in the emerging strategy at PS19a.
- 5.4 Land North of the West of Stonehouse (i.e. Land at west of Stagholt Farm) was included in the SALA May 2017, it is part of the site ref STO016 in the Parish of Standish included in Appendix 3 as sites with future potential. It is a greenfield site and comprises 33.77 hectares of which 24 hectares is developable, with a capacity for 800 dwellings and mixed use development. Access to the site would be via the West of Stonehouse allocation in the adopted Local Plan (Policy SA2 and planning ref. s.14/0810/OUT). There are no constraints. The site rises gradually from east to west and is largely flat towards the north. The site is bisected by an unsurfaced track, which provides vehicular access to Stagholt Farm and fields.
- 5.5 It is considered that extending the adopted Local Plan site SA2: Land West of Stonehouse into site PS19a makes the best use of the services and facilities and

infrastructure to be delivered at the existing allocation in terms of delivering an increased number of dwellings and employment land for the Tier 1 settlement for the plan period up to 2040. The proposed area for development PS19a is in close proximity to large areas of employment and close to the strategic highway infrastructure of the M5 motorway interchange at Junction 13.

- 5.6 It is noted that the SALA states that an initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to a designated heritage asset and that an initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to a designated natural environment site.
- 5.7 The Landscape Sensitivity Assessment has identified this site within the area (ST07) as having a Medium sensitivity to housing uses and High/medium sensitivity to employment uses. The landscape sensitivity report states that *“Housing would definitely extend the current settlement form and if implemented on the rising slopes to the north may become visible further north. Housing could be implemented on the lower areas and employment on land to the south east. Consideration should be given to potentially implementing this with nearby sites to create a more coherent and integrated settlement form on the northern edge of Stonehouse.”*
- 5.8 The SALA concludes that *“Although not currently policy compliant, the lower land below the higher northern boundary may have future potential for housing, employment and community development as an extension to the planned West of Stonehouse development, should the Local Plan strategy identify the need for growth in this location. There is potential for planning development with nearby sites to create a more coherent and integrated settlement form on the northern edge of Stonehouse.”*
- 5.9 It is noted that the Sustainability Appraisal accompanying the consultation identifies at Appendix 7 p.716 Site STO016 ‘Land to the north west of Stonehouse’ as suitable for consideration as a broad location for development for mixed use.
- 5.10 Irrespective of the fact that the site is proposed in the emerging strategy, Pegasus object to the assessment in the SA which appears to have been undertaken without any regard to the existing allocation in the adopted Local Plan at West of Stonehouse (Policy SA2 which provides for 1,350 dwellings, 10

hectares of employment, a local centre, a two form primary school etc. as there are a number of negative scores e.g. on services and facilities the assessment has concluded that *“the site is not within or directly adjoining a Tier 1-5 settlement (it is located outside Stonehouse).*

- 5.11 The settlement boundary for Stonehouse needs to be updated to reflect the allocations in the adopted Local Plan.

APPENDIX 1 - LAND TO NORTH WEST OF STONEHOUSE

- 5.12 Pegasus consider that the site should be allocated in the Stroud Local Plan Review residential and mixed use development. Pegasus supports the allocation of PS19 a) as a mixed-use strategic allocation in the emerging draft Stroud Local Plan, but the quantum of development should be increased to 800 dwellings. Pegasus consider that the site should be included in the Local Plan review being well related to a Tier 1 settlement at Stonehouse with access to facilities and services and is therefore consistent with the settlement strategy. The site is available, suitable and achievable and could start to deliver housing in 2021/22.

Question 5.0b - Would you like to propose alternative wording? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to.

- 5.13 No comment.

Question 5.0c - Do you support the identified key issues and priorities for action for your area(s)?

- 5.14 No comment.

Question 5.0d - Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).

- 5.15 No comment

Question 5.1a Assuming some growth is desirable, have we identified the best site(s) at each town and village? (Please clearly specify which settlement(s) your comment(s) relate to, and use the site reference numbers shown on the map, where relevant)

Stonehouse Cluster – Stonehouse

STO 006 – Land South of Bristol Road

- 5.16 Pegasus consider that STO 006 Land South of Bristol Road should be considered for development purposes in the emerging SLPR. The site is situated adjacent to the main A419, it was considered in the SALA 2017 as site (STO 006) 'Land South of Bristol Road', a site plan is attached at Appendix 2.

APPENDIX 2 - LAND SOUTH OF BRISTOL ROAD

- 5.17 The SALA concluded that:

“Development of housing or employment should be small scale and there would need to be green gaps retained to allow views towards the canal corridor and to emphasise the physical separation between the historic mills. In terms of housing, this site could be part developed for medium density development typically comprising a mix of detached, semi -detached and terraced dwellings at an average density of about 30 dph, and the suggested yield is 70 units.”

- 5.18 The site is located on land immediately adjacent to the built-up area of Stonehouse. The town forms part of the Stroud Urban Area along with the settlements of Stroud, Thrupp and Brimscombe, North and South Woodchester and Nailsworth and lies approximately 4km to the west of Stroud Town centre. The site is itself is located on the south western edge of Stonehouse approximately 0.8km from the town centre. It lies to the south of the A419 Bristol Road which acts as key arterial route linking Stroud to the M5 motorway. The site is a flat arable field on the southern side of the A419, Bristol Road.
- 5.19 From the adopted Local Plan Proposals Map it can be seen that the site is located immediately adjacent to, but outside of the defined settlement boundary. The site is however enclosed by existing development on three sides with residential and large scale industrial development to the north, modern Industrial and business units to the west and a commercial training centre and established areas of residential development beyond a railway embankment to the east. To the south beyond a line of trees is the Stroudwater Canal, which separates the site from the open countryside beyond.
- 5.20 The site is situated immediately opposite the residential area of Avenue Terrace and the industrial area of Stonehouse Commercial Centre both on the northern side of the main road. The site consists of a roughly rectangular parcel of land

contained by the Stroudwater Canal to the south with Bonds Mill to the west and the elevated railway to the east. The site comprises 4.5ha of which 2.12ha is considered developable.

- 5.21 The Landscape Sensitivity Assessment (December 2016) has identified this site ST13 as “Medium sensitivity to housing uses and Medium sensitivity to employment uses. Housing or employment south of the road would remove the openness of the area, and therefore the green gap, and would therefore reinforce the ribbon development character of the A419. It would also, potentially, adversely affect the setting of the canal. If housing or employment is considered, it should strictly follow the Conservation Area policies and guidelines and strong green gaps should be retained which allow views towards the canal corridor. It would however be very important that it addresses both the Bristol Road and canal edges in an appropriate way as well as providing gaps in the frontage.”
- 5.22 The Heritage Impact Appraisal (May 2017) identifies that there are “significant constraints” although the site itself has no structures of historic interest, it lies within the IHCA and contributes to the setting of the conservation areas character.
- 5.23 In the Issues and Options consultation, the site was included in the area ‘STO A South of Bristol Road’ and identified as a broad location for development around the settlement of Stonehouse. Pegasus consider that the site should be included in the Local Plan review being well related to a Tier 1 settlement at Stonehouse with access to facilities and services and is therefore consistent with the settlement strategy. The site is available, suitable and achievable and could start to deliver housing on adoption of the plan in 2021 delivering a range and mix of open and affordable housing products in the early part of the plan period.
- 5.24 The LUC Sustainability Appraisal (SA) (2018) accompanying the consultation considers residential site options at Section 5.0 ‘Sustainability Appraisal Findings for the Site Options’. Paragraph 5.4 states that:
- “Detailed findings for each site option are presented in SA matrices found in Appendix 5. An audit trail showing whether each site option was selected or discounted for inclusion in the Local Plan Review Emerging Strategy Paper is presented in Appendix 7”.**
- 5.25 Table 5.3 of the SA ‘Summary of scores for mixed use site options’ indicates that site STO006 was considered by the SA for mixed use purposes (despite being in

Appendix 3 of the 2017 SHLAA as having potential for up to 70 dwellings). The site has been promoted to the SLPR for residential purposes, not mixed-use purposes and has previously been the subject of an outline planning application for up to 90 dwellings including infrastructure, ancillary facilities, open space and landscaping and construction of new vehicular access from the A419 Bristol Road (S.13/1348/OUT). The application was refused on 19th December 2014 and a subsequent appeal was withdrawn in October 2015.

5.26 Appendix 7 of the SA p.716 states with regard to site STO006:

“The SALA identified that the site may have future potential for some development subject to resolving specific constraints and impacts. However, having considered the scale of growth appropriate for this settlement set out in the emerging strategy and the benefits and dis-benefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development.”

5.27 Pegasus object to the findings of the SA as the site was not promoted to the Council as a mixed-use allocation; it should have been considered with other sites submitted to the Council for residential purposes at Stonehouse.

5.28 It is considered that a further medium sized residential site at Stonehouse will help ensure the delivery of new dwellings to meet housing need at the Tier 1 settlement in the first five years of the plan, complimenting the larger sites of PS19a and PS19b which will ensure a continued supply of housing for the remainder of the plan period.

5.29 Notwithstanding all of the above the site would also be suitable for employment generating uses.

CAM & DURSLEY CLUSTER

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

5.30 The focus on jobs and services at the First-Tier settlement of Cam and Dursley is supported. The provision of new homes will help to support economic growth and will reduce in commuting as a range of choice of new homes are provided for the *‘area’s skilled and trained workforce’*.

5.31 It is noted that:

“Cam and Dursley have the best access to key services and facilities of anywhere in the District.”

Question 5.0b - Would you like to propose alternative wording? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).

5.32 No comment.

Question 5.0c - Do you support the identified key issues and priorities for action for your area(s)?

5.33 No comment.

Question 5.0d - Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).

5.34 No comment.

Cam and Dursley

PS21 – Land adjacent to Tiltdown House

5.35 The emerging SLPR identifies site PS21 Land adjacent to Tiltdown House as a potential site for development for up to 15 dwellings. The site was included in the May 2017 SALA (ref: CAM008) and a site plan is attached at Appendix 3. Pegasus support the emerging allocation.

APPENDIX 3 - LAND ADJACENT TO TILSDOWN HOUSE

5.36 This is a greenfield site comprising 0.8 hectares and is within the Settlement Development limit of Cam. It is outside the conservation area and there are no identified constraints. As the site is located within the identified settlement limits the site has not been assessed as part of the Landscape Sensitivity Assessment.

5.37 Land at Tiltdown House, Cam is according to the SALA suitable, available and deliverable for residential development. Moreover, it lies within the development boundary of Cam as defined in the adopted Local Plan and can come forward to deliver housing numbers in the short term. The site is surrounded by housing, except to the south east which adjoins open grassland north of Tiltdown House. It is acknowledged that Tiltdown House, is a historic building. Part of this site could be developed to provide for 15 dwellings.

5.38 The site is suitable, achievable and available. It is noted that the SALA assessment concludes that the site could be developed for medium/high density

development typically comprising a mix of semi-detached and terraced dwellings at an average density of 40dph.

- 5.39 The site performs well in the LUC (2018) Sustainability Appraisal accompanying the consultation with less impact on biodiversity, air quality, landscape and townscape than other sites at Cam. The site does score negatively with regard to the historic environment, however this matter can be addressed with a sensitive and appropriate layout and design and materials that enhance and respect the setting and character of the historic Tiltdown house.

THE SEVERN VALE CLUSTER

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

- 5.40 The proposed vision for the Severn Vale Cluster states:

“Whilst maintaining and improving public transport, accessibility and services will remain key aims for these communities, this part of the District will experience no ‘strategic’ growth or development during the plan period.....

.... villages and hamlets may see small scale development in response to identified local needs, boosting their ability to remain sustainable and thriving communities. Frampton on Severn and Whitminster will continue to be a focus for local service provision..”

- 5.41 As a Tier 3 settlement located adjacent to the M5 and on the A38 with sustainable transport links to Gloucester, Stonehouse and Stroud Whitminster is well placed to take development that meets more than local needs. The Parish does not have an adopted Neighbourhood Development Plan nor is it in the process of preparing a Neighbourhood Development Plan so without an allocation in the emerging SLPR it is unlikely that new development will come forward at the settlement to meet wider or local housing needs.

- 5.42 The Housing White Paper (Feb 2017) ‘Fixing our Broken Housing Market’ highlighted the role that new development can play in helping rural villages to thrive as well as providing homes for local people. This is reflected in paragraphs 77 and 78 of the NPPF (2018) with paragraph 78 stating that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow

and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”(emphasis added)

5.43 No strategic plan led growth is proposed for the Severn Vale cluster of villages, other than ‘small scale development to meet local needs’. Page 18 of the SLPR document states that the emerging strategy will deliver:

“small scale housing in rural areas in the interests of social sustainability, subject to local community support through the preparation of neighbourhood plans”

5.44 It is noted that currently none of the Parishes in the Severn Vale Cluster are identified as Neighbourhood Areas and therefore there are currently no Neighbourhood Plans in preparation in this area. There is therefore, currently no plan led mechanism in the Severn Vale Cluster area for the delivery of allocated sites to meet local (or wider strategic) housing needs. Local needs could only be met through speculative development or sites delivered via an ‘exception sites’ policy. (It is noted that Frampton on Severn have recently had a Community Design Statement approved as supplementary planning advice by Stroud environment Committee on 13th December 2018).

5.45 The Severn Vale Cluster of villages is the only mini-vision area in the emerging SLPR not to have any sites identified in the consultation document as having potential for growth. It is considered that in order to be NPPF compliant and to continue to support local services that some capacity for growth should be identified for this Cluster in the SLPR. The Sustainability Appraisal accompanying the consultation evidences at Table 6.6 ‘Summary of SA effects for ‘mini visions’ in the Stroud Local Plan (Emerging Strategy Paper) (p.99) that the mini vision for the Severn Vale Cluster has negligible effect on housing, this is considered to be contrary to paragraph 59 of NPPF (2018) which states the Government’s objective of ‘*significantly boosting the supply of homes*’ and further evidences the need for provision for some growth at Whitminster to come through an allocation the SLPR.

5.46 Given the extensive heritage and flooding constraints experienced by Frampton on Severn it is considered that the better location for strategic growth for the Severn Vale Cluster is at Whitminster, which also benefits from a local centre (unlike Frampton) and is located on the A38 in close proximity to the strategic road network of the M5. The village also has existing sustainable transport links

to the nearby employment centres of Quedgeley, Gloucester, Stonehouse and Stroud.

Question 5.0b - Would you like to propose alternative wording? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).

- 5.47 Reference is required to sustainable strategic growth at Whitminster, such growth will also facilitate the delivery of new affordable housing which is mentioned as a key issue and top priority for the cluster.

Question 5.0c - Do you support the identified key issues and priorities for action for your area(s)?

- 5.48 The provision of new affordable housing and accommodation to facilitate downsizing is noted in the locally identified key issues and top priorities for the area. Such accommodation could be facilitated through the identification of a strategic housing site or sites at Whitminster in the emerging SLPR.

Question 5.0d - Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).

Severn Vale Cluster - Whitminster

- 5.49 The emerging SLPR consultation document does not identify any sites for potential growth at Whitminster (p.86). Pegasus has submitted sites to the SALA previously on behalf of Robert Hitchins Limited.
- 5.50 In the emerging strategy for Whitminster the consultation acknowledges that there are no significant physical constraints, there are some listed building within and to the north and southeast of the village, the River Frome wildlife site abuts the village in the south west.
- 5.51 Reference is made to the preferred direction of growth in landscape terms are to the north east and north west of Whitminster. However, the Landscape Sensitivity Assessment was undertaken in 2016 and looked at landscape parcels adjacent to the District's main settlements. Part 1 included a summary of each settlement's landscape sensitivity and identified whether there was a preferred direction for future growth, should it be needed, in landscape terms. Part 2 consisted of maps and detailed assessments of individual land parcels around each settlement. The assessment was not comprehensive across the District as it only included some land around settlements. The landscape sensitivity appraisal

was intended to cover all land parcels immediately outside, but adjacent to the defined settlement development limits. Land Parcels (LPs) were defined for the areas directly around settlements covering the majority of areas assessed in the SALA study. However, it is noted that the land parcels identified for study were defined by the character of the landscape and settlement edge, not necessarily by the SALA site boundaries. They do not necessarily include all of very large sites extending far beyond the settlement edge.

- 5.52 For Whitminster, areas to the east of the A38 were considered but only land running in a north south direction from the works to the Animal Shelter, including Whitminster Inn, and several fields of Grove End Farm towards the roundabout junction of the A38 and the A419 to the M5. The landscape sensitivity for the entire site at Grove End Farm has not been assessed.
- 5.53 Pegasus has submitted sites to the SALA on behalf of Robert Hitchins Limited. The following three sites at this sustainable Tier 3 settlement are promoted for inclusion in the emerging Stroud Local Plan. The paragraphs below explain why the sites are considered to be suitable, sustainable, available, deliverable, developable, viable and consistent with the development strategy.
- 5.54 The attached plan show how well placed Whitminster is to meet future housing and employment needs.

APPENDIX 4 - LOCATION PLAN GROVE FARM, WHITMINSTER

WHI 007 Land at Grove End Farm

- 5.55 Land at Gove End Farm is considered in the SALA (New Sites Update Report October 2018) as WHI 007, a site plan is attached at Appendix 5.

APPENDIX 5 - LAND AT GROVE END FARM WHITMINSTER

- 5.56 It is included within Appendix 3 of the 2018 SALA update - 'Sites with Deliverable and Future Potential'. It is a greenfield site comprising approximately 47.5 hectares and is promoted for 15.5 hectares for Business Park/Employment Generating uses and 27.5 hectares of Residential Use including green infrastructure and 4.5 hectares for Social/Community Uses.
- 5.57 The site adjoins the Whitminster Local Centre to the north, the M5 motorway to the south east, the A419 to the south west, the A38 to the south west and open countryside to the north east.

5.58 While the site is situated outside the identified Whitminster settlement boundary it adjoins the built form of the settlement to the north comprising the local centre which includes a pub, restaurant and retail facilities and the Highfield Garden World/Retail Centre, Whitminster to the east of the A38. The western boundary of the site abuts two linear groups of residential development that front the A38, but are situated outside the settlement boundary.

5.59 The northern part of the site is also well located to other services and facilities that are located to the east of Whitminster village in close proximity to the A38 including public transport services to Gloucester, Stonehouse and Stroud.

5.60 The Landscape Sensitivity Assessment (ref Wh07) identifies the site as part of a larger parcel, which extends northwards beyond the site, as High/Medium sensitivity to housing use and Medium sensitivity to Employment use. Only the north eastern quadrant of our client's site is considered by this study.

5.61 The site is situated adjacent to the boundary of the Industrial Heritage Conservation Area (IHCA), but is separated from it by the A419.

5.62 The SALA update 2018 states that:

"There are no known physical constraints that would prevent development of this site. The site is gently sloping; there are no known ground contamination or land stability issues. Access to the site is from the A38. There is reasonable access to services and facilities in the local area."

5.63 It continues:

"An initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to a designated natural environment site."

5.64 The SALA provides a summary of the suitability of the site which is misleading as it states that the site is not suitable for housing development because of the landscape sensitivity of the site. However, the whole site has not been assessed in the Landscape Sensitivity Assessment of 2016. The SALA then states:

"Although not currently policy compliant, there may be future potential for some employment development in the northern corner of the site, adjoining Grove End Farm, should the Local Plan strategy identify the need for growth in this location. The development would require appropriate landscaping to allow screening and integration into the landscape." (my emphasis)

5.65 The SALA assessment of development potential concludes that the site is suitable for employment uses:

“Taking account of the character of the site and its surroundings, the small field southwest of Grove End Farm adjacent to the A38 and the triangular parcel of land southeast of existing buildings on Grove Lane could be developed for low density rural commercial development typically comprising single storey offices, light industrial or small format warehousing units.”

5.66 Pegasus considers that the Council’s assessment is only for part of the site. The whole site needs to be considered. The site is a highly sustainable location, at the junction of the A38/M5 and the A419 corridors, equidistant from and accessible to (including by public transport) Stroud, Cam/Dursley and Gloucester.

5.67 This is a sustainable alternative (or an addition to) to development proposed at Sharpness and Wisloe.

5.68 The land is in the control of a single landowner, provides for employment in an attractive market location, is unconstrained by designation and subject to an appropriate disposition of development (having regard to the Conservation Area to the south of the A419, existing public rights of way, and site topography) can be readily delivered to meet needs/requirements in the Plan period.

5.69 The site is not subject to any specific landscape designations, nor does it have any heritage constraint, it would be possible therefore to design a form of development that respects the landscape setting when viewed from local receptor points, including the public rights of way within the site.

5.70 The sensitive development of the site is therefore considered to represent sustainable development in accordance with paragraph 11 of the NPPF with no unacceptable adverse or severe impacts that would significantly and demonstrably outweigh the benefits of delivering housing in a sustainable location which would contribute towards the Council’s five-year housing land supply requirement.

5.71 The site is available, suitable and achievable and could start to deliver housing on adoption of the plan in 2020/21. It could redress the acknowledged imbalance as the emerging strategy states that: *“Whitminster has a small but important employment role and is a net importer of workers.”*

- 5.72 The LUC (2018) Sustainability Appraisal (SA) that accompanies the consultation indicates at p. 76 that the site was assessed for mixed use purposes. This is appropriate (as outlined above), the site is promoting residential use, and employment uses along that part of the site abutting the A419.
- 5.73 The site scores positively with regard to housing, health, employment and economic growth with only minor impacts to biodiversity, historic environment and flooding, however major impacts are identified for landscape, air and water quality and efficient use of land, it is not clear how this assessment has been made in the absence of the appropriate evidence base, e.g. no comprehensive landscape assessment for the site or the publication of other evidence.
- 5.74 It is considered that the site is well related to the strategic road network for employment purposes and once finer grained landscape evidence is prepared development at the site could be accommodated without a significant negative impact on the landscape setting.
- 5.75 Pegasus object to the scoring given to SA objective as this does not appear to be justified, there is no evidenced published to support the scoring as part of the consultation.

WH 001: Land East of School Lane Whitminster

- 5.76 Land East of School Lane was included in the SALA May 2017, (ref WHI001) and a site plan is attached at Appendix 6.

APPENDIX 6 - LAND EAST OF SCHOOL LANE WHITMINSTER

- 5.77 This is a greenfield site comprising 6.2 hectares and adjoins the settlement boundary. It is considered that the site has a capacity of 200 dwellings. There are no significant physical constraints. Whitminster is a third-tier settlement in adopted Policy CP3 of the Stroud Local Plan (2015) and is maintained as a third tier settlement in the proposed emerging strategy for the SLPR. As referred to above Whitminster provides a range of local services and facilities that meet the day-to-day needs of residents, including a Primary School, convenience store and post office, 2 no. pubs / restaurants, a village hall, children's play area and playing fields. The village is also served by regular bus services between Gloucester and Dursley that stop outside the Whitminster Inn on the A38.
- 5.78 Whilst the site lies outside the existing settlement boundary for Whitminster it adjoins existing built form and the existing settlement boundary to the south east

and a number of residential properties. The site adjoins agricultural land to north, east and, on the opposite side of School Lane, to the west with houses on Holbury Crescent to the south. The site is therefore well related to the existing built form of Whitminster.

5.79 The site is also well related to existing local facilities in the village of Whitminster, in particular Whitminster CoE Primary School which is less than 100m to the south east of the application site. Whilst other local facilities (including bus stops) are located towards the east of the village they are all within a 5-10 minute walking distance of the site and therefore fully accessible to the site without reliance upon the private car.

5.80 There are no known physical constraints that would prevent development of this site. The site is relatively level; a public footpath crosses the site, there are no known ground contamination or land stability issues; there is good access to School Lane; there is reasonable access to services and facilities in the local area.

5.81 The latest Landscape Sensitivity Assessment (2016) has identified the site (ref changed to Wh04) as Medium sensitivity to Housing Use and High sensitivity to Employment use.

5.82 An initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to any designated heritage asset.

5.83 An initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to any designated natural environment site. The assessment did not consider whether there are protected species on this site.

5.84 The SALA (2017) concluded that:

“Although not currently policy compliant, there may be some potential for housing development in the future on the south eastern part of the site, south east of the public right of way, should the Local Plan strategy identify the need for growth in this location although substantial tree screening on the North Eastern boundary would be necessary to limit the impact on views from the north, north east and east. Employment development is not suitable.” (my emphasis)

5.85 It is noted that the SALA considers the development potential of the site,

“Taking account of the character of the site and its surroundings, the south eastern part of the site could be developed for medium density development typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of about 25dph, and the suggested yield is 45 units.”

- 5.86 The site is environmentally unconstrained and will not lead to any harm in terms of impact on highway safety, flooding, heritage assets, landscape or biodiversity. The proposed development is therefore considered to represent sustainable development in accordance with paragraph 11 of the NPPF (2018) with no unacceptable adverse or severe impacts that would significantly and demonstrably outweigh the benefits of delivering housing in a sustainable location which would contribute towards the Council’s five-year housing land supply requirement.
- 5.87 In the Issues and Options consultation the site is included in the area WHI E East of School Lane (for housing and community uses only) and identified as a broad location for development around the settlement of Whitminster. Pegasus consider the whole of the SALA site WHI001 should be included as it is within the same landscape assessment area of WH04 and that mitigation can be discussed in respect of the north eastern boundary. The site is available, suitable and achievable and could start to deliver housing on adoption of the plan in 2020/21.
- 5.88 The LUC (2018) Sustainability Appraisal that accompanies the consultation indicates at p. 59 that the site performs well compared to other submitted sites at Whitminster. The site has no discernible impact on the historic environment or water quality, climate change or waste while it is judged as having a minor positive impact on housing, health and economic growth.
- 5.89 Pegasus objects to the scoring given to SA objective SA 10 Air Quality as there is no evidenced published to support the scoring as part of the consultation.

WHI 005: Land West of School Lane Whitminster

- 5.90 Land West of School Lane is included in the SALA (May 2017) (ref WHI005) and a site plan is attached at Appendix 7.

APPENDIX 7 - LAND WEST OF SCHOOL LANE WHITMINSTER

- 5.91 This is a greenfield site comprising 4.18 hectares and adjoins the settlement boundary. It has a capacity of 120 dwellings.

- 5.92 Whilst the site lies outside the existing settlement boundary for Whitminster it adjoins existing built form and the existing settlement boundary to the south east and a number of residential properties and agricultural buildings to the north west. Development of the site will therefore involve the infilling of a gap between the existing settlement boundary and an area of built form to the northwest. The site is therefore well related to the existing built form of Whitminster.
- 5.93 The site is also well related to existing local facilities in the village of Whitminster, in particularly Whitminster CoE Primary School which is less than 100m to the south east of the application site. Whilst other local facilities (including bus stops) are located towards the east of the village they are all within a 5-10 minute walking distance of the site and therefore fully accessible to the application site without reliance upon the private car.
- 5.94 The Landscape Sensitivity Assessment (ref Wh03) has identified the site as Medium sensitivity to Housing Use and High sensitivity to Employment use.
- 5.95 The SALA concludes that:
- “Although not currently policy compliant, there may be some potential for housing or community uses in the future on the south eastern half of the site, south east of the public right of way and subject to substantial tree screening on the South Western boundary, should the Local Plan strategy identify the need for growth in this location. Employment development is not suitable.” (my emphasis)**
- “Taking account of the character of the site and its surroundings, the south eastern part of this site could be developed for community, sports and leisure or medium density housing development typically comprising a mix of detached, semi -detached and terraced dwellings at an average density of about 25 dph, and the suggested yield is 40 units.”**
- 5.96 The site is environmentally unconstrained and will not lead to any harm in terms of impact on highway safety, flooding, heritage assets, landscape or biodiversity. The proposed development is therefore considered to represent sustainable development in accordance with paragraph 11 of the NPPF (2018) with no unacceptable adverse or severe impacts that would significantly and demonstrably outweigh the benefits of delivering housing in a sustainable location which would contribute towards the Council’s five-year housing land supply requirement.

- 5.97 This SALA concludes that only part of the site should be developed, and this was identified in the Issues and Options consultation.
- 5.98 The entire site was the subject of a planning application ref. S.14/1829/OUT and refused on 19th December 2014. However, it has been demonstrated through the submission of various technical reports that the application site is environmentally unconstrained and will not lead to any material harm in terms of impact on highway safety, flooding, heritage assets, landscape or biodiversity. The proposed development is therefore considered to represent sustainable development with no unacceptable adverse or severe impacts that would significantly and demonstrably outweigh the benefits of delivering housing in a sustainable location which would contribute towards the Council's five-year housing land supply requirement. Part of the site (i.e.: the area south of the footpath) was the subject of a planning application S.17/0563/OUT for 60 dwellings. The application was refused on 30th May 2017.
- 5.99 In the Issues and Options consultation, the site was included in the area WHI A West of School Lane (for housing and community uses only) and identified as a broad location for development around the settlement of Whitminster. Pegasus consider the whole of the SALA site WHI005 should be included (for 120 dwellings) as it is within the same landscape assessment area of WH03 and that mitigation can be discussed in respect of the boundary. The site is available, suitable and achievable and could start to deliver housing on adoption of the plan in 2020/21.
- 5.100 The LUC (2018) Sustainability Appraisal that accompanies the consultation indicates at p. 59 that the site performs well compared to other submitted sites at Whitminster. The site has no discernible impact on the historic environment or water quality, climate change or waste while it is judged as having a minor positive impact on housing, health and economic growth.
- 5.101 Objection is raised to the classification of the site for SA 11 Water Quality as major negative as reference to the Environment Agency map for Drinking Water Safeguarded Zones and Nitrate Vulnerable Zones¹ shows that only the south eastern fringe of the site falls within the Drinking Water Safeguarded Zone (Surface Water). The remainder (and majority) of the site is not affected and should score a zero 'no impact' score.

¹ <https://environment-agency.cloud.esri.uk.com/farmers/>

5.102 Objection is also raised to the classification of the site for SA 10 Air Quality as major negative. The findings of the Stroud SALA Transport Accessibility Assessment have not been published as part of the consultation, therefore there is no evidence base to support this finding.

5.103 Moreover, the site on the opposite side of School Lane (WHI001), also promoted by our client, only scores a minor negative in the SA with regard to this matter yet both sites are equidistant from the same public transport facilities.

5.104 Our client requests that the matters raised above be addressed and rectified in any further SA published with regard to sites at Whitminster, as currently the sustainability scoring of site WHI005 is compromised.

6.0 BACKGROUND STUDIES

Question: Are there any other specific local studies that you believe are needed to inform the Local Plan Review?

6.1 The SLPR is still in preparation with a further round of Regulation 18 consultation proposed in autumn 2019 which will comprise an emerging Draft Plan. The evidence base to inform the plan continues to develop, however studies that are currently still required to inform whole plan preparation include the following:

- Strategic Housing Needs Assessment
- Economic Needs Assessment
- Transport and Highways Capacity modelling evidence
- Infrastructure Delivery Plan
- Viability evidence to support affordable housing and developer contribution policies

6.2 Evidence should also be provided of the Duty to Co-operate between neighbouring authorities, the County Council, the Local Enterprise Partnership and other statutory agencies involved in assisting in plan preparation including (but not exclusively) Highways England; The Environment Agency and Historic England.

Question: Have you any advice on the scope or content of any of these studies?

6.3 The Strategic Housing Needs Assessment should be prepared in accordance with national planning practice guidance² and consider specialist need requirements over and above the standard method for accommodation for students, those who are unable to access market housing and the elderly.

6.4 The Economic Needs Assessment should be prepared in accordance with national planning practice guidance and consider needs up to and beyond the plan period so that the plan can be future proofed for emerging needs beyond the plan period.

² <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>
& Paragraph: 006 Reference ID: 12-006-20150320

- 6.5 The Transport and Highways Capacity modelling evidence should be used to inform plan preparation and spatial strategy development in accordance with NPPF paragraph 31.
- 6.6 It is noted that the Strategy Options Transport Discussion Paper (July 2018) should be updated to test Options for development that meet the quantum of development required for the plan period arrived at by using the NPPF Standard Method plus any additional requirement required by the County Local Housing Needs Assessment currently in the process of preparation. The Standard Method quantum is currently a minimum of 5,700 dwellings over and above that already allocated or committed in the Stroud Local Plan (2015) and is referred to in the Council’s Consultation document at p.16. This figure will need to be continually reviewed until the plan is submitted.
- 6.7 Further Transport and Highways evidence should be prepared to support the emerging plan once the evidenced development requirements are known.
- 6.8 An Infrastructure Delivery Plan should be prepared to better understand the strategic and local infrastructure requirements of the emerging spatial strategy which seeks to place the majority of new development in the plan period in the Severn Vale. An understanding of the existing capacity of statutory undertakers and utility providers will be required in order to effectively assess the timescales for delivery of new homes from the proposed new settlements and the assumptions on delivery being made by the Council with regard to five-year housing land supply.
- 6.9 Utility providers may need to provide for upgrades to serve the proposed new strategic sites through their own business planning processes including five-year plans. Implementation of upgrades may affect the delivery of sites and assumptions made in the SLPR with regard to the quanta of homes to be delivered at each site in the plan period. The delivery of new sub stations or other enhanced supply requirements for utility provision at the three large sites proposed will impact on the cost of delivering the sites and cash flow of the developers and therefore the ultimate viability of sites. It may also have an impact on the delivery of other policy requirements of the plan such as affordable housing.
- 6.10 Viability evidence will be required to support the submission of the plan to demonstrate its deliverability and to ensure that the policy requirements of the

plan do not exacerbate the delivery of strategic sites. The cumulative burden of policy requirements should be set to that most sites are deliverable without further viability assessment and negotiations (paragraph 57 of the NPPF). It is important the Council understands and tests the influence of all inputs on viability as this determines if land is released for development.

- 6.11 Should the studies result in evidence that demonstrates the emerging spatial strategy cannot deliver the growth requirements of the plan then the Council should consider the allocation of additional sites to ensure a reserve capacity exists for the delivery of housing and economic need requirements of the plan. The housing need is a minimum requirement.

APPENDIX 1:
LAND TO NORTH WEST OF STONEHOUSE

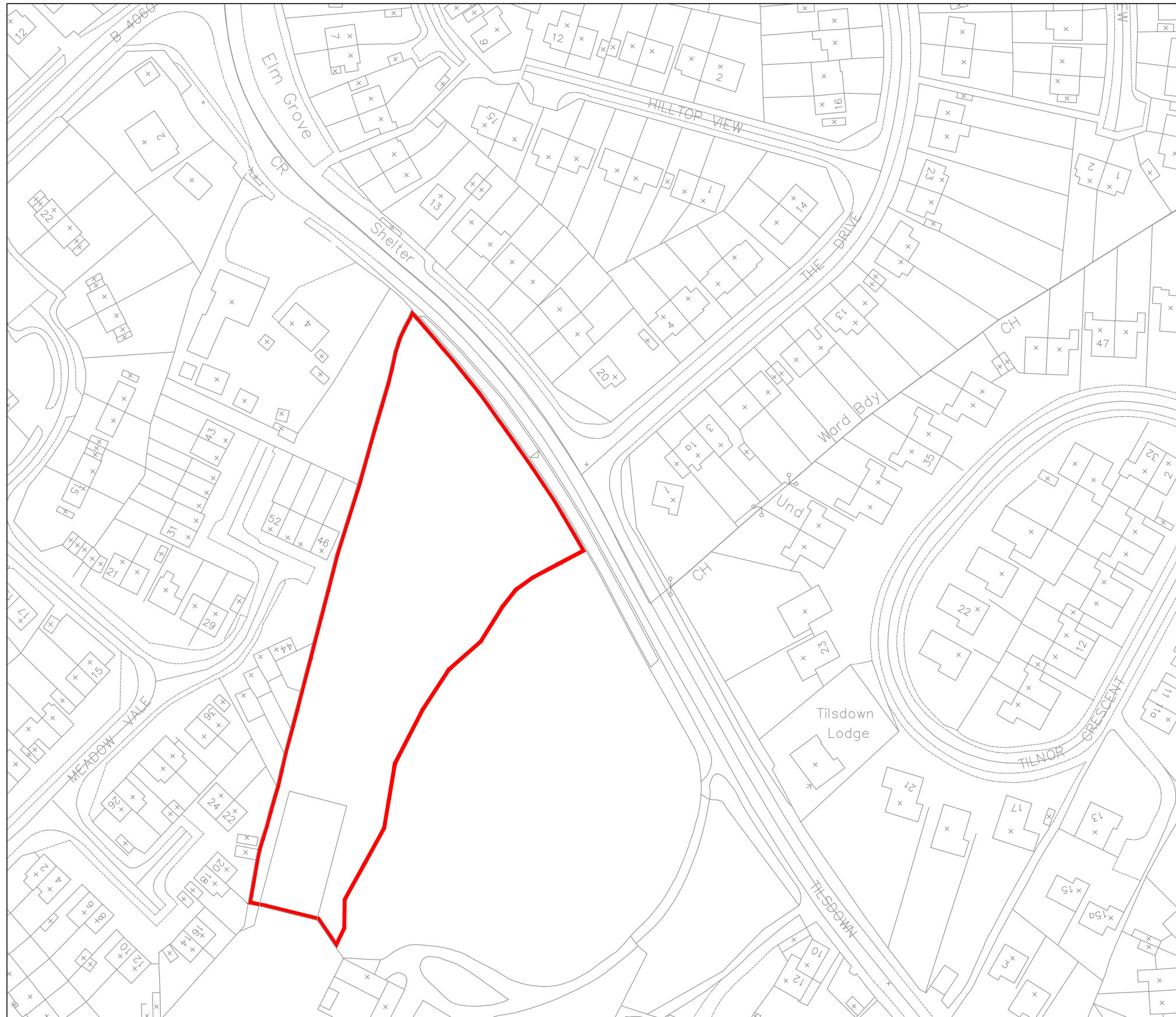
APPENDIX 2:
LAND SOUTH OF BRISTOL ROAD



Land off Bristol Road, Stonehouse

Scale: 1:1250

APPENDIX 3:
LAND ADJACENT TO TILSDOWN HOUSE



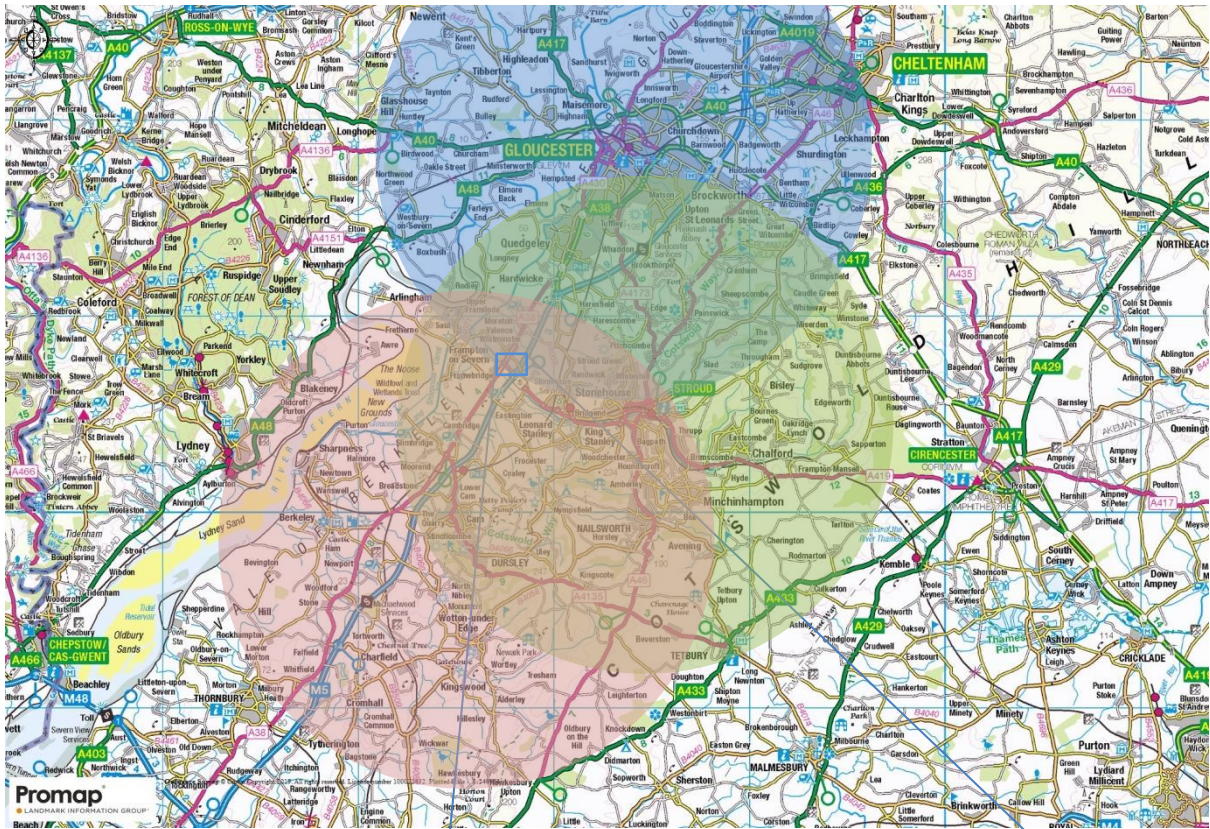
Tilsdown, Cam,

Scale: 1:1250@A3

APPENDIX 4:

LOCATION PLAN GROVE FARM, WHITMINSTER

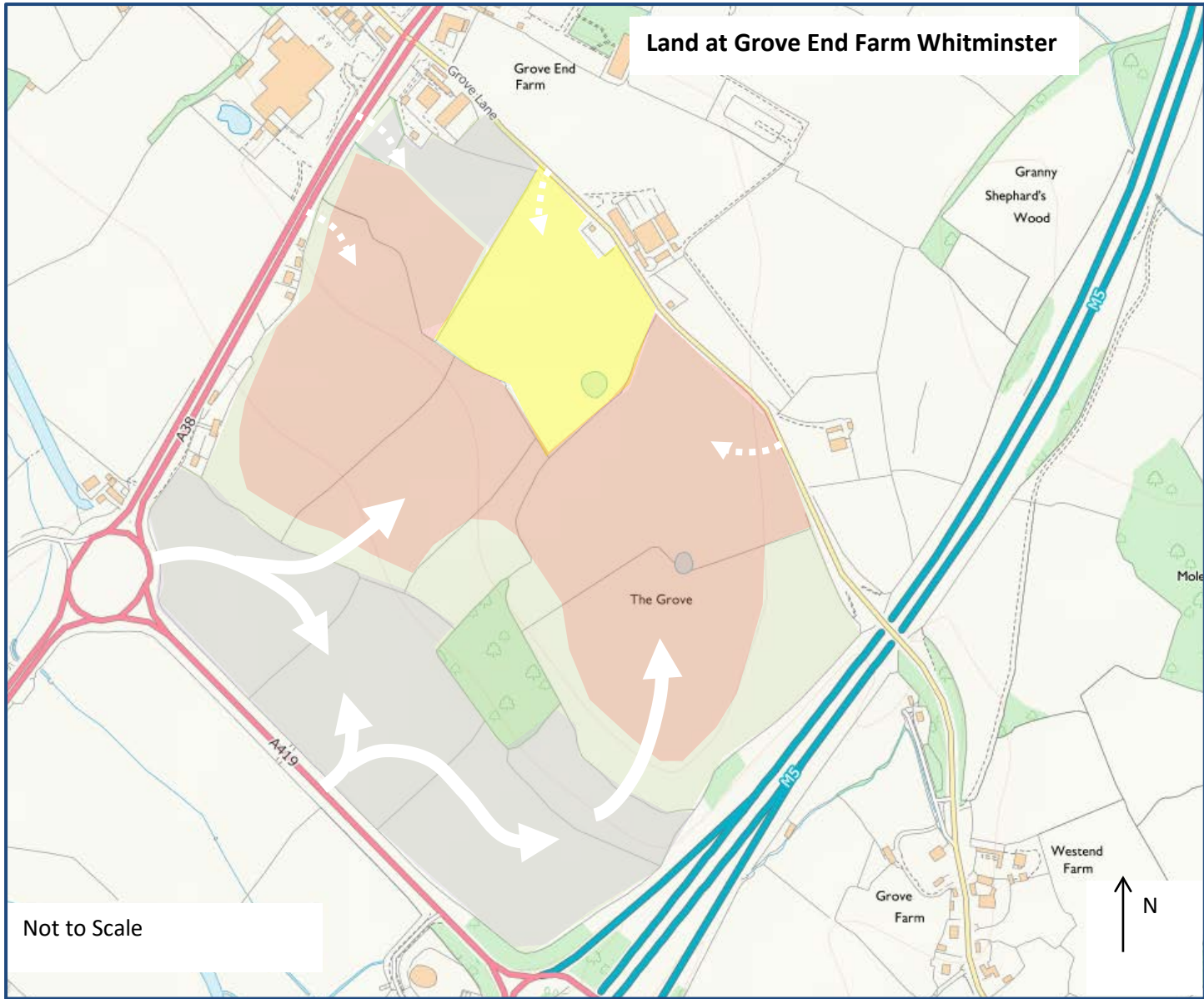
APPENDIX 4: Location Plan Grove End Farm, Whitminster








APPENDIX 5:

LAND AT GROVE END FARM, WHITMINSTER

Land at Grove End Farm Whitminster



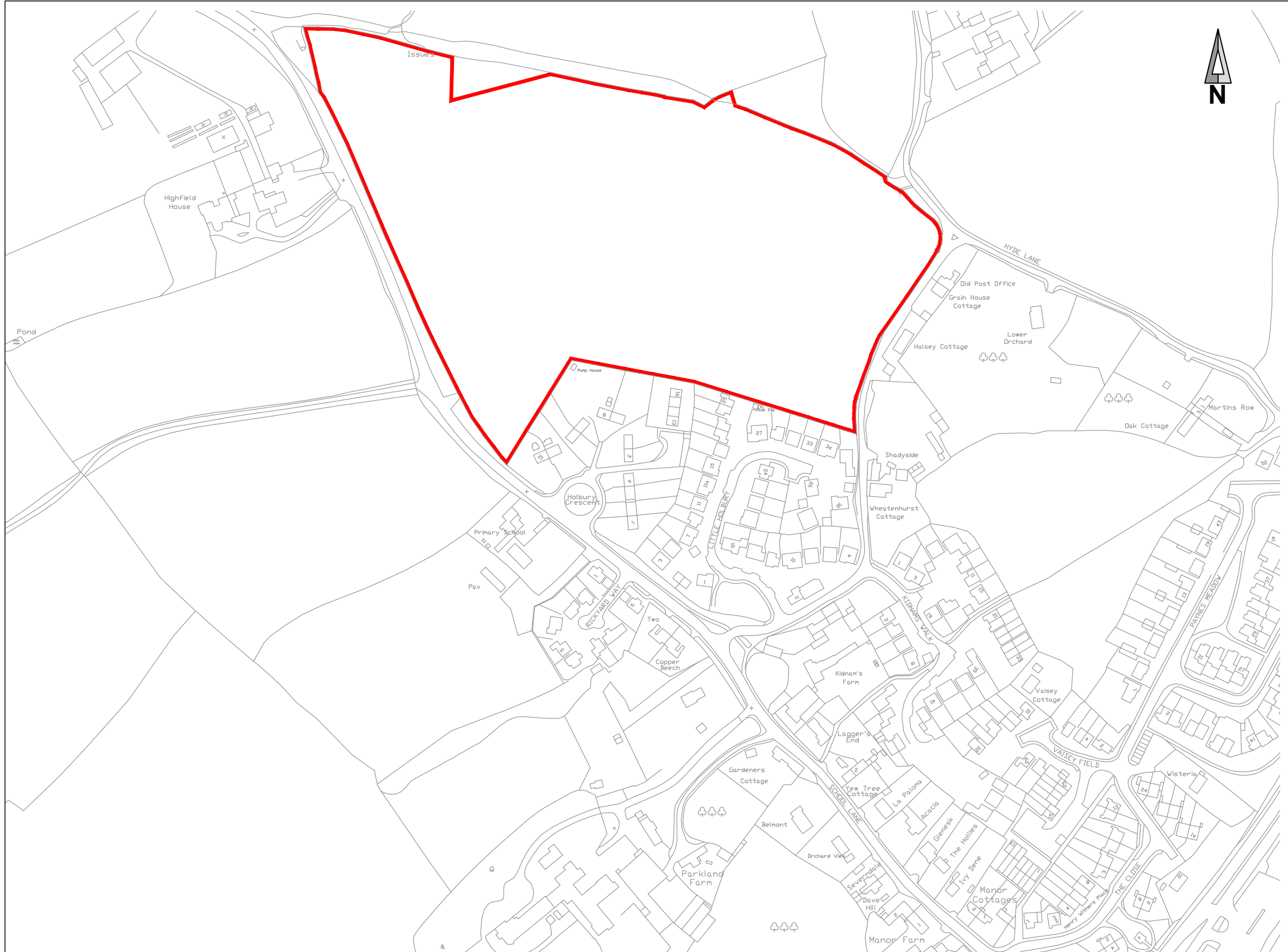
Concept Plan KEY

-  Business Park/Employment Generating uses (15.5 ha)
-  Residential inc GI (27.5 ha)
-  Green Infrastructure
-  Social/Community Uses (inc sports pitches, recreation facilities, & primary school) 4.5ha
-  Central Woodland

Not to Scale

APPENDIX 6:

LAND WEST OF SCHOOL LANE, WHITMINSTER

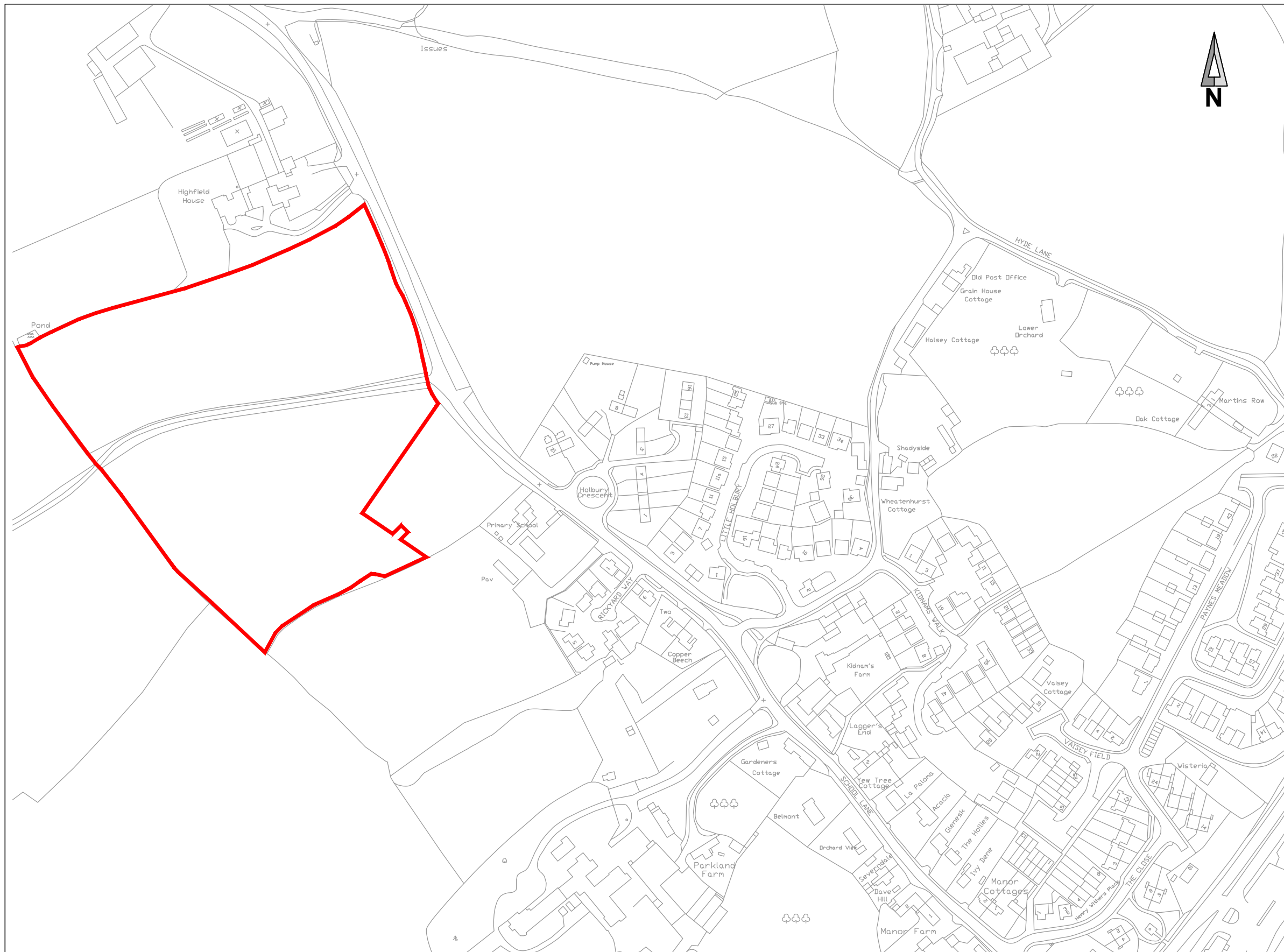


Whitminster, East of School Lane

Scale: 1:2500@A3

APPENDIX 7:

LAND WEST OF SCHOOL LANE, WHITMINSTER



Whitminster, West of School Lane

Scale: 1:2500@A3