

**ON BEHALF OF CLIFTON HOMES (SW) LTD**

**REPRESENTATIONS TO STROUD DISTRICT  
COUNCIL'S PRE-SUBMISSION DRAFT LOCAL  
PLAN**

**IN RESPECT TO LAND NORTH OF TAIT'S HILL  
ROAD, CAM**

**July 2021**

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LOCAL PLAN**

**IN RESPECT TO LAND NORTH OF TAIT'S HILL ROAD, CAM**

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## 1.0 INTRODUCTION

1.1 On behalf of Clifton Homes (SW) Ltd, Grass Roots Planning have been instructed to prepare and submit representations to Stroud District Council's Pre-Submission Local Plan (Regulation 19) consultation, currently taking place until the 21<sup>st</sup> July 2021. This is with particular reference to land north of Tait's Hill Road, Cam, which is being promoted for residential development by Clifton Homes, a local developer and land promoter.

1.2 This document sets out our concerns to the emerging Stroud Local Plan and the strategy it contains. The focus of these concerns relates to the fact that the strategy relies too heavily on strategic-scale sites, with those selected not underpinned by robust evidence to demonstrate why they are the most sustainable and viable options to accommodate housing growth. Our concerns also remain that the reliance on these sites will result in the council being unable to demonstrate a five-year housing land supply (5YHLS) in the early years of the plan.

1.3 As part of this document, we will set out how we consider the emerging plan fares when considered against the tests of soundness that are set out in paragraph 35 of the NPPF (July 2021) which are as follows:

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

1.4 As set out within our previous representations, whilst we are pleased to see Cam and Dursley have been selected as for a location for growth due to its sustainable location, we consider that the strategy is too heavily focused on the north-east and north-west of the town (which includes Wisloe), with all sites allocated being strategic in scale. In our view, growth would be better distributed to other parts of the town to avoid over-concentrating development in one specific location. This also provides a broader portfolio of sites, including smaller sites

that can come forward in the early years of the plan period in advance of the larger strategic sites that will take a significant amount of time to start delivering housing, due to lead-in times associated with obtaining planning permission and the delivery of supporting infrastructure. Without such a change there will be insufficient flexibility built into the plan and the ability to maintain a five-year housing land supply in its early years must be seriously questioned.

1.5 We are specifically promoting a site for future allocation in the Local Plan at land north of Taits Hill Road, Cam (the site) to provide circa 60 homes and extensive public open space. This could provide a suitable replacement site if existing proposed allocations are found to be unsound, or deliver a broader portfolio of sites if required, or housing numbers need to be increased across the district.

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

- Appendix A – Site Location Plan
- Appendix B – Emerging Framework Plan
- Appendix C – Landscape and Visual Initial Appraisal
- Appendix D – Transport Note
- Appendix E – Preliminary Ecological Appraisal Note
- Appendix F – Drainage Note

1.7 We have previously submitted representations on behalf of Clifton Homes to the 'Additional Housing Options' consultation undertaken in January 2021 which included technical work to demonstrate the site's deliverability. However, having reviewed the latest evidence and documents produced by the Council it does not appear that any consideration has been given to this alternative site and the evidence presented at that time; therefore, we are concerned over the lack of an iterative process in this regard which we will go onto discuss in more detail within this statement.

1.8 We note that during both the Environment Committee & the full Council meeting, motions were put forward to remove the strategic allocation at Wisloe and replace this with Moreton Valence. This appeared to be voted in favour of but then a second vote was undertaken to publish the Plan as agreed without this amendment. The minutes of this meeting are not particularly clear and therefore there appears to be a lack of transparency in this decision-



making process. It appears that both strategic allocations at Wisloe and Sharpness remain within the Pre-Submission Local Plan, both of which we have serious concerns over as we have set out within our previous representations and will expand upon in this statement.

1.9 The overreliance on strategic scale sites will have a certain impact on the delivery of homes within the earlier stages of the plan as we will go on to set out, however, given the questions raised over their commercial attractiveness and viability, there is also concern as to whether they will deliver the scale of housing currently anticipated at all. A broader and more diverse portfolio of land should be allocated, of varying sizes, to deliver homes and other development over the next five years and beyond; this should include allocating land to the south of Cam as significant land has already been allocated to the north of the settlement cluster.

1.10 Our evidence is set out in the following sections:

- **Section 2** – Housing Requirement
- **Section 3** – Concerns over Specific Allocations
- **Section 4** – The impact on Five-Year Housing Land Supply
- **Section 5** – Land north of Tait's Hill Road, Cam
- **Section 6** – Conclusions

## 2.0 HOUSING REQUIREMENT

- 2.1 During the previous stage of consultation relating to the Additional Housing Options (AHO) paper, it was noted that the Ministry for Housing, Communities and Local Government (MHCLG) were intending to make changes to the Standard Method for Calculating Housing Need ('the standard method'), which would have resulted in a higher annual housing need figure of 786 per annum (15,720 over the 20-year plan period). We commended SDC for taking this positive approach to housing delivery.
- 2.2 However, we note that MHCLG has now abandoned these plans and therefore SDC have reverted back to the original housing requirement of 630 dwellings per annum (12,600), with additional provision to meet Gloucester's needs.
- 2.3 Paragraph 010 of the PPG recognises that *'the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates'*.
- 2.4 Therefore, we have reviewed whether there may be any other circumstances which warrant an increase in overall housing provision.
- 2.5 We have had regard to the Gloucestershire Local Housing Needs Assessment (LHNA) published in August 2020 which identifies that there is an overall unadjusted need for affordable housing of 424 dwellings per annum (8,480 homes over the plan period).
- 2.6 As set out in the Plan, this would require a high level of affordable housing to be provided across individual sites in order to achieve this level of development, which was demonstrated not to be viable, which is a reasonable assumption.
- 2.7 However, the current provision set out in the Plan would only deliver up to 3,810 affordable homes, and that relies on 30% affordable housing being delivered across every site, and it is clear from the viability evidence provided in the council's evidence base, that this won't be achievable. This is less than half of the unadjusted affordable need identified; as such, we question whether a higher level of housing should be delivered across Stroud (over and above the minimum required in the Standard Method) to address a greater level of affordable housing need as a potential option for the Plan, this hasn't been properly and robustly considered as a reasonable alternative and it should be to ensure that the plan is sound.

### 3.0 THE SPATIAL STRATEGY

#### Overreliance on Strategic Scale Sites

3.1 Within our previous representations to the AHO Consultation (Appendix G), we set out our concerns in relation to the level of homes coming forward in on strategic-scale sites, which may require significant infrastructure to be delivered. Since this time, the housing requirement has reduced and the number of homes on some of the strategic sites has increased. As such, the table is now as follows:

Strategic sites ▼	Number of dwellings at each
Cam North West	900
Cam North East Extension	180
South of Hardwicke	1,350
Hunts Grove Extension	750
Sharpness Docks	300
Sharpness	2,400 (5,000 by 2050)
Stonehouse North West	700
Wisloe	1,500
Local sites at smaller settlements ►	985 (cumulative)
<b>Total</b>	<b>At least 9,065</b>

Figure 1. Extract of Proposed Housing Delivery on Strategic Sites

3.2 This equates to 8,080 dwellings, equivalent to 64% of the total housing requirement of 12,600 homes, 52% of the total number of dwellings anticipated to come forward (15,555 homes once existing commitments are taken into account, which incidentally also rely on strategic sites) and makes up 78% of the allocations and windfalls proposed as part of this new Local Plan (8,080 dwellings out of 10,340 coming forward). This also does not take into account the proposed allocation at Whaddon (2,500 dwellings) to meet the needs of Gloucester City. This is an extremely high proportion of overall growth and in our view represents an acute over-reliance on such sites.

3.3 We have reiterated our table from paragraph 4.9 of our previous representations to highlight the stark difference with other authorities in the region, which have a much lower proportion of strategic allocations, as shown below in table 1:

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

	Stroud Local Plan Review (2019 draft plan)	Cotswold District Council (2011 – 2031)	South Gloucestershire Council (2006 - 2027, adopted in 2013)	Tewkesbury, Cheltenham & Gloucester Joint Core Strategy
Housing Need	12,600	8,400	28,355	35,254
Total Supply	15,555	9,614	28,850	31,824
Number of dwellings from Strategic Allocations (over 500 units)	8,080	1,800	10,400	11,400
<b>% of Total Supply</b>	<b>52%</b>	<b>19%</b>	<b>36%</b>	<b>36%</b>

- 3.4 SDC are therefore relying far too heavily on strategic sites to come forward in a timely fashion to deliver the housing required, as well as ensuring that there is a robust 5YHLS throughout the plan period. Evidence to date has demonstrated that this is difficult to achieve, as we go onto discuss in the next section.
- 3.5 With consideration of the table above, it is clear that the number of strategic allocations proposed is significantly higher than nearby authorities. South Gloucestershire Council and the Tewkesbury, Cheltenham and Gloucester authorities whose strategic allocations make up 36% of their overall supply, far lower than Stroud's, have repeatedly been found unable to demonstrate a five-year housing land supply of sites, primarily because of long lead-in times associated with larger strategic sites.
- 3.6 A broader portfolio of sites is required to achieve a balanced range of site sizes and types, which will allow development to come forward early on in the plan period, including the provision of affordable housing. Currently, we consider that the plan will fail to meet paragraph 60 of the NPPF (July 2021) which requires '*a sufficient amount and variety of land can come forward where it is needed*'.
- 3.7 Without the removal of some of the strategic sites (such as Sharpness and Wisloe, which we discuss in detail below), and their replacement with a more suitable range of site sizes, we consider that the strategy set out under policy CP2 of the emerging plan is unsound.

## Concerns over Specific Allocations

### Sharpness

- 3.8 We will not seek to repeat our concerns in full, but would direct the Council and the Inspector to paragraphs 4.26 – 4.37 of our representations to the AHO Consultation, which are available in Appendix G of this submission. We have further expanded on some specific points and evidence which has come to light since the previous representations were submitted.
- 3.9 As set out, our primary concern in relation to this site is its unsustainable location, and the potential infrastructure costs that are highly likely to be required in order to make it accessible, which in our view renders the proposals unviable and undeliverable. The starting point is to assess the existing sustainability credentials of the site, and then, if the site is unsustainable, whether there are reasonable and credible mitigation options to make it accessible in transport terms.
- 3.10 Our concerns are supported by Stagecoach and we have previously referenced their statements specifically within our representations, so we do not seek to repeat these again.
- 3.11 Aside from the fact that the site is an unsustainable settlement for strategic-scale development, we have concerns over the mitigation proposed and the reality of this providing a reasonable choice of alternative transport modes to the private car.

### *Transport*

- 3.12 Since the previous submission, a range of documents have been published by the promoters which have been prepared by Stantec, including a document entitled '*Sharpness Vale – Mobility-as-a-Service and Express Coach Services*', which is a strategy, viability and funding appraisal (March 2021).
- 3.13 The document focuses heavily on 'Mobility as a Service' or 'MaaS', which essentially looks to the future and how changes in our working patterns and technology means that we are no longer reliant on more 'traditional' transport provision, such as bus services, and more like to focus on on-demand transport that groups riders together. MaaS is an app service which seeks to combine all available transport services within that area and provide the user with a 'joined-up' experience in taking public transport and other modes of sustainable travel. Second to this is the provision of a bespoke bus service with operator Zeelo, and a bespoke railway service.

3.14 Stantec's report states that the proposals are 'good value-for-money' for a subscription to a MaaS service, however, the comparison costs and take-up are related to very large cities, such as London, Gothenburg, Helsinki and Birmingham. These areas all have a very high concentration of people within a more limited geographical location that provides opportunities for significant patronage, compared to a very rural location such as Sharpness where there is no significant existing demand to underpin such a service and houses are unlikely to be delivered for at least 10 years. Put simply, it is unrealistic to expect sustainable transport providers such as Car Club, Uber, E-Scooters, etc. to set up a business where there is no business case to do so, due to a lack of demand – all MaaS does is collate the existing services which are extremely limited. Second to this, is that the comparison of costs again relate to large cities where wages are much higher when compared to a rural area of Gloucestershire, such as Sharpness and its hinterland. The costs cited would be relatively unaffordable for residents in this location based on local wages, particularly if the variety of transport options promised are not available. We do not consider that this presents a real 'value-for-money' option.

3.15 Further to this, we note that the documents state '*at present, the Sharpness Vale promoters have not formed a partnership with a MaaS operator, as it would make sense to do this once the commencement of the development is closer*'. Whilst we appreciate there are 'unknowns' relating to the development, this is concerning, particularly given that the infrastructure for the development needs to be planned for early in advance for it to work. This does not comply with the Garden City Principles which states that it should provide '*integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport*'. There is no commitment from the various transport providers of car club, electric scooters, etc., that this will be delivered at Sharpness nor is there any commitment to MaaS from the developers of the site.

3.16 As such, at the present time, it is highly likely that Sharpness would be reliant on the provision of the proposed Zeelo bus service and the railway service. On page 16 of the Stantec document, it noted that '*there will be a need to pump-prime the service at the outset*', however there is no commitment from the promoters that they would fund this, nor is there any developer committing to this cost. There are serious concerns with this approach which are as follows:

- There is no existing demand or provision that can be synergised with – therefore any costs associated with developing a bus service in this location will be very expensive, and less relevant or attractive to an operator, given the remoteness of the location;

- This will cause a significant gap between cost and revenue particularly in the early stages of the development, and there is no clear vision for who will be funding this gap and who has committed to the guaranteed delivery of this service;
- There is some suggestion that households will pay a management fee towards the costs of public transport – this does not support the Garden Village principles of ‘land capture value for the whole community’ and there is no assessment of what that cost might be and whether it may affect viability and hence the delivery of policy compliant levels of affordable housing;
- The anticipated assumptions made on the modal share between buses and coaches is extremely high compared to even inner London when they anticipate only having a single choice of departure time and a single return time to one destination – this does not provide a real choice of transport options and the level of patronage will be far more limited; and
- Local bus enhancements are not costed at all.

3.17 Our view remains therefore that the costs of providing a sustainable transport solution for this site have not been rationally considered and will not result in realistic alternative transport options other than the private car.

3.18 The Infrastructure Delivery Plan (IDP) states that *‘consultation with GCC Highways highlighted the reliance on the PS36 New settlement at Sharpness providing a high level of trip internalisation. It is therefore vital that supporting infrastructure, such as shops and services, are provided in a timely fashion to minimise out-commuting and reduce pressure on the surrounding highway network’* (page 28). As such, it is concerning to note that the trip analysis relies on the local centre being delivered early on in the process and the impact on the highways network may be even more severe than anticipated. In our view, the alternative transport solutions offered are not realistic or credible options given the lack of commitment to pump-prime the services envisioned and the fact that revenue will be extremely low within at least the first 10 years of the delivery of housing in this location.

3.19 Whilst the Zeelo bespoke service is a good aspiration, it is not realistic and needs to be supported by a traditional bus service that links in with it and connects residents between smaller areas to allow accessibility for all. The service claims to ‘unashamedly target commuter traffic’ – what would be much simpler is to place development in locations which can more easily and readily be made sustainable, in close proximity to existing employment areas and facilities, such as Cam. Further to this, it does not consider the proportion of the population that may be less able and / or rely on public transport to get around on a day-to-day basis.

- 3.20 With respect to the railway line, we note that this is anticipated to be a 'bespoke service' too, yet there is limited to no evidence from Network Rail that they support the delivery of a new railway line in this location, contrary to the promoter's submissions. Whilst there has been an application for funding for a full business case, it remains to be seen what the actual costs of developing the railway line are, and whether the promoter is willing to fund it without it resulting in this being passed on to the cost of the individual, i.e. those buying homes in the future. At the current time therefore, we fail to see how it remains as a credible option for providing an alternative means of travel to the private car, as it has in no way been costed and the results of such a costing fed into a viability assessment. Therefore, the current strategy simply hopes for the best without any reliance on actual data and evidence.
- 3.21 This was noted in the Gloucestershire Rail Investment Strategy (March 2020) which states that *'whilst the reopening of the line could provide sustainable transport to Sharpness and enable significant growth in the area, analysis shows a very limited GVA impact for a very costly new piece of infrastructure. This was also reflected in the comments from Network Rail and GCC Highways'* (page 29). Whilst there is some reference to the Sharpness Branch, it is clear that the initiative is driven by the desire to 'support significant new development around Sharpness'. The introduction of the new line provides no benefit nor improves the service for the existing population, and only seeks to accommodate the new homes, thereby resulting in a significant cost benefit. This does not demonstrate deliverability of a sustainable location for growth.
- 3.22 An alternative would be to allocate land where infrastructure has already been costed and planned for, which development could seek to enhance and leverage off, or locate development where the need to travel to access employment and other facilities is not so acute.
- 3.23 In light of the above, we do not see how realistic and informed transport options have been put forward to ensure that there will be a realistic alternative to the private car once Sharpness begins to deliver housing. Our concerns are two-fold: first, that this will result in reliance on the private car which will in turn adversely effect air quality and CO2 emissions, meaning that the Strategy fails to meet the requirements of the Climate Change Act; and second, that this will result in viability and delivery issues for the site, resulting in a reduction in affordable housing or other infrastructure delivery.



## *Viability*

3.24 Within our previous representations we noted some viability concerns over Sharpness set out within the Local Plan Viability Assessment (May 2021), the following has been noted:

- At both Wisloe and Sharpness premiums have been applied to the potential sales values to account for the fact that they will both follow the 'Garden Village' principles; it also relies on the proximity of Bristol as a market to justify these values. However, the fact remains that the location is not market tested and the values adopted are aspirational. They do not, for example, test a more conservative scenario such as values closer to those prevalent in the area. However, despite the increased premiums, there are still concerns with Sharpness as a viable option for development, with the Viability Assessment indicating that there are 'challenges' with this area (paragraph 12.88 of the assessment). These viability concerns must be given serious thought due to the level of affordable housing that is expected to be delivered here as a consequence of the overall scale of the development. If it does not achieve this, then the council's strategy for addressing affordable housing need becomes uncredible, even based on their acceptance that the full level of assessed need will not be met by the plan.
- Table 7.2 sets out the initial strategic infrastructure and mitigation costs for Sharpness, this was anticipated to be £61 million (averaging at £28,596 per qualifying household) in the May 2020 paper. Within the new paper (May 2021), this has suddenly decreased to £42 million therefore lowering it to £17k per dwelling, with no detailed explanation as to why this has occurred. Further to this, it does not provide any allowance for additional pump-prime funding for the first few years of the bus service required to make it a sustainable location for commuters.
- Paragraph 12.74 states *'the infrastructure cost for the Strategic Sites (as set out Chapter 7 above) is about £20,000/unit. On these sites, viability is constrained, with none of them being able to deliver 30% affordable housing and £20,000/unit.'* The results of this is that the Viability Assessment recommends that the Council engages with the owners of the Strategic Sites to determine whether this level of contribution can be sought.

3.25 In conclusion, the Council's own viability work highlights significant concerns in respect to the viability of these locations, even based on the unrealistically high sales values that have been adopted and the dramatic and unevidenced reduction in assessed infrastructure costs. The report requires that the owners of the Strategic Sites should provide detailed evidence to

demonstrate that the 30% affordable housing requirement can be achieved alongside the costed infrastructure – to date, we can find no clear or concise report which describes this.

*Agricultural Land Quality*

3.26 Based on the provisional Agricultural Land Classification Maps from Natural England, the majority of Sharpness lies within Grade 3 agricultural land – it is unclear whether this is considered to be ‘Best and Most Versatile’. There is no evidence to confirm this but if the land is Grade 3a or above, this would result in a significant proportion of BMV land being removed, contrary to national guidelines. This is being determined at a stage where reasonable alternatives existing to provide the development necessary to meet the housing requirement over the plan period.

*Transport*

3.27 The Infrastructure Delivery Plan (IDP) March 2021 identifies on pages 26 – 28 the package of highway mitigation measures that will be required in response to the allocation of land at Berkeley, Sharpness Docks, Focus School, and the new settlement of Sharpness. The junction improvement schemes identified are set out in the table below, alongside the costs associated with delivering them (taken from the Traffic Forecasting Document) – unless they are considered unfeasible, then the reasoning for this is given instead.

*Table 2. Highways Mitigation Required to support Sharpness*

	A38 / B4066	£250k - £2.5m
Conversion to signal control with flare extension on B4066 approach	A38 / Breadstone	This will be addressed via the improvements to the A38 / B4066 junction. Mitigation to this junction is considered inappropriate due to the nature of the road.
Addition of Traffic Signals, with flaring provided on A38 southbound approach	A38 / B4066 Berkeley Road	£250k - £2.5m.
N/A	A38 / Stone	No highways improvements are proposed despite the fact that the junction would exceed capacity during the AM peak and large

		increases in southbound demand. It states that mitigation is unlikely to be appropriate due to the minor nature of the road.
Signalisation of existing three-arm give-way junction, with widening on Alkington Lane approach.	A38 / Alkington Lane	£250k - £2.5m. It should be noted that these mitigation measures would require land acquisition either side of Alkington Lane, as such, costs are likely to be the higher end of the spectrum and currently it is unknown if this mitigation is deliverable.
Limited widening on B4066 eastbound approach to existing roundabout	B4066 / Station Road	Low and very low cost schemes (likely to be under £250k)
Removal of existing hatch marking and potentially minor carriageway widening on northbound A38 approach	A38 / A4135	Low and very low cost schemes (likely to be under £250k)
N/A	A38 / Wick Road	No mitigation measures are proposed given the nature of Wick Road, despite it being assessed as exceeding capacity in the PM peak.
Introduction of traffic signal control	B4066 / Alkington Lane	£250k - £2.5m

3.28 This level of mitigation is required even assuming a high level of trips being internalised within the promoters' model, as highlighted by GCC and referenced in paragraph 3.18 of this statement. The IDP itself recognises that *'the proposed allocations as PS34 Sharpness Docks and PS36 New settlement at Sharpness have an issue of relative remoteness in public transport terms. This increases demand for private car usage'*, which calls into question whether the assumptions about high levels of internalisation are reasonable.

- 3.29 A simpler solution would be to allocate land that is more accessible, particularly in respect to employment opportunities, which is already located on existing transport corridors and where bus operators consider that a reasonable business case could be made for improving and extending the services in this location, that would avoid significant infrastructure funding being required. It is unclear at this stage whether the Highways Authority or Highways England would issue a holding direction in respect to the delivery of Sharpness until such mitigation has been secured and implemented; if they would, then that would add to the need to deliver most of these significant improvements upfront, thereby exacerbating the viability issues identified in respect to these sites and resulting in significant delays to the delivery of homes, failing to boost supply in the shorter-term.

#### *Other Concerns*

- 3.30 We have previously raised other concerns regarding the allocation of land at Sharpness, however we note in the IDP that it states *'the Sharpness Garden Village would also likely have significant recreational impacts on the designated sites. These impacts may go beyond those assessed within the existing Severn Estuary Recreation and Mitigation Strategy and further work is required to understand implications and to develop appropriate mitigation'* (page 94). Given that the Severn Estuary Recreation and Mitigation Strategy does not account for additional growth in this location, it is highly likely that further work will be required to update this plan to ensure recreational impacts do not breach environmental legislation. It is unclear whether this will result in further delays to the delivery of Sharpness without a mitigation strategy in place, and whether such mitigation would add to infrastructure costs.

#### *Conclusions on Sharpness*

- 3.31 As set out, we consider that the first step in the preparation of the plan should have been to assess the baseline situation of a site's location and whether it has the ability to accommodate significant development in terms of accessibility. In our view, Sharpness is not an appropriate location for significant growth given the adverse impact this would have on the highways network which already optimistically assumes high levels of internal trip generalisation – therefore, the full impact may not be realised.
- 3.32 This reflects the conclusions found during the previous Local Plan preparation where the site was dismissed, with the Council at the time stating: *'whilst Sharpness has the theoretical capacity to achieve this scale of development (and more), it is relatively remote from the main employment centres and primary facilities and services in the District, would require significant new infrastructure and has flood risk and landscape impact issues'* (page 22 of

CDF15 'Towards a Preferred Strategy, Pros and Cons of Potential Locations for Strategic Growth').

- 3.33 The transport mitigation set out for the site does not appear realistic, it has not been properly costed and the funding to deliver it thought through. We do not consider it to be a credible option for alternatives to the private car; development at Sharpness will simply exacerbate issues of commuting to Bristol and other key locations within the Stroud area. Further to this, it appears that the promoters of the site have not considered the development in a holistic manner by ensuring that all would be able to access public transport – it simply focuses on commuters and not those that may need to travel between smaller locations. It cannot meet the needs for those travelling to smaller destinations because there is no credible business case for local bus services in this location as Stagecoach have highlighted. This is a significant adverse issue against its allocation for the scale of development proposed.
- 3.34 Reliance is placed on a railway scheme which has no funding secured for its delivery and no full business case developed. Therefore, the costs of re-introducing the line are extremely unclear and it does not currently have the support of Network Rail, or any other rail operator in the area.
- 3.35 It would be far more logical to place development in a location where concentrations of employment opportunities already exist, key facilities are available and within transport corridors which are already, or can be made, sustainable through reasonable levels of investment. In comparison, land at Sharpness will rely heavily on pump-prime funding; government investment; and / or will result in individuals having to pay (i.e. through increased house prices, ongoing management fees or significant public transport fares). As such, we do not consider it to be a sound and reasonable location for development and instead land should be allocated at more sustainable settlements such as Whitminster (for strategic-scale development) and Cam (non-strategic development).

### **Wisloe**

- 3.36 We set out our primary concerns regarding these allocations in paragraphs 4.1 – 4.25 of our representations to the AHO consultation earlier this year, a copy of which is available in Appendix G of this statement. Since that consultation stage was completed, additional evidence has now been produced by the promoters (GCC and Ernest Cook Trust Ltd) of the allocation at Wisloe which forms part of the evidence base to the Local Plan; this covers matters in respect to agricultural land classification, ecology, heritage, highways, flood risk,

landscape and noise. Our comments are made below following a thorough review this information.

#### *Agricultural Land Quality*

- 3.37 After raising initial concerns in respect to this matter, on the evidence provided that the land is Grade 3B agricultural land, we can now accept that there would be no conflict with national planning policy in respect of this issue.

#### *Highways*

- 3.38 With respect to highways, the following infrastructure requirements are noted:

- A new bridge over the Railway line;
- New pedestrian / cycle link across the motorway, which would need to span over 6 lanes of motorway traffic and hard shoulders; and
- Public transport strategy options including the extension / diversion of services 60/61 into the development; provision of a new service; and provision of bus priority infrastructure.

- 3.39 It is unclear whether the promoters of the site have costed these pieces of infrastructure and whether they are incorporated into the viability appraisal work undertaken by HDH. Again there is the potential issue that Central Government investment and pump-priming funding will be required in order to make the proposals accessible and deliverable; without these significant pieces of infrastructure delivered it is clear that the proposals would not be sustainable in accessibility terms and given the need to offer future residents the realistic of travel options without the need for the private car.

- 3.40 It is also interesting to note that the highways assessment prepared in support of the allocation at Wisloe does not look at cumulative impacts on the network from additional trips generated by this site and the nearby allocations in Cam and there is no evidence to demonstrate that this will not cause significant adverse effects on the road network from the provision of over 3,000 dwellings in this general location. Given that the allocation of these sites will predominantly affect the same junctions, in our view it is important to establish whether any mitigation is required up front and whether this will have an impact on delivery in the front end of the plan period.

## Noise

- 3.41 A noise assessment has now been undertaken by Acoustic Consultants Ltd on behalf of the promoters for Wisloe. This has identified serious noise concerns with the site, as the extracts below show which are taken from the noise reports prepared:

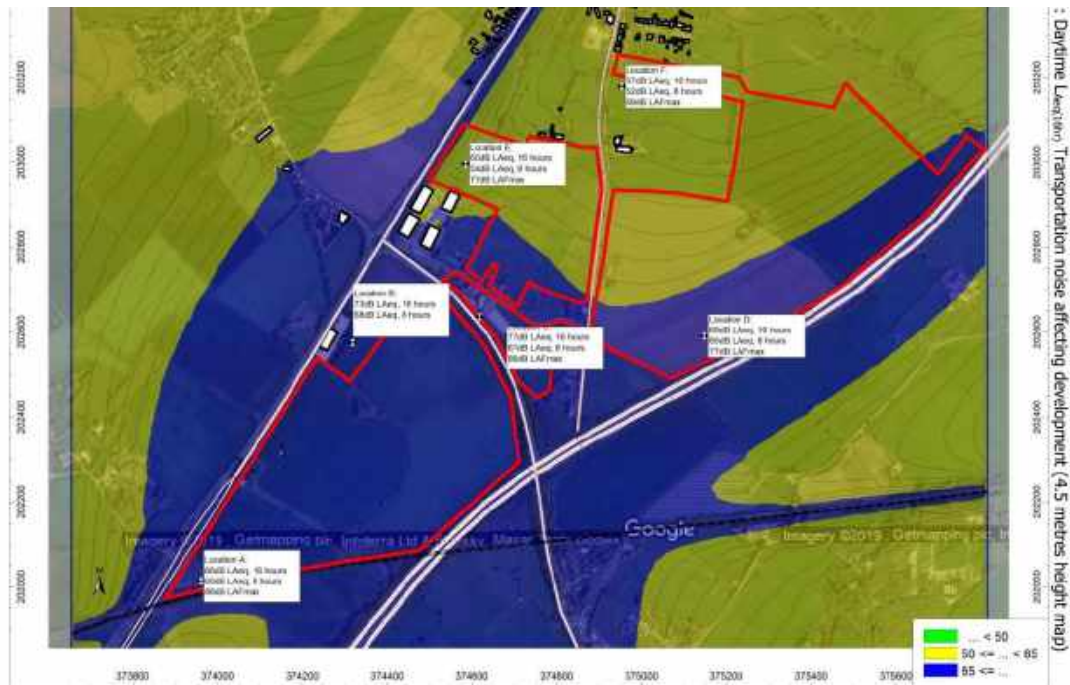


Figure 2. Baseline Noise Assessment results

- 3.42 As a result, the noise assessment recommends that windows would need to remain closed to resolve noise issues at the site. This in turn, can lead to either requirements to incorporate mechanical ventilation (and therefore an increased cost to the developer) or windows would have to be closed, resulting in overheating of a property and requirements to cool it. It is unclear whether this has been considered in the design and layout of the scheme.
- 3.43 Some consideration has been given to garden areas within the noise report but it appears no detailed layout has been prepared, which does not allow the assessors to adequately consider this issue.
- 3.44 As such, there remains a concern over the significant noise levels at the site which appear to sterilise a significant proportion of the land; we therefore question whether 1,500 dwellings are deliverable in this location without significantly adversely affecting the amenity of future residents.

### *Conclusions on Wisloe*

- 3.45 Our previous concerns set out in our representations to the AHO consultation still remain, particularly the lack of a cumulative assessments on transport impacts and how noise will seriously inhibit the delivery of housing and make future amenity issues unavoidable. The additional technical evidence to date has not alleviated our concerns with respect to viability, deliverability and some technical aspects of the scheme.
- 3.46 This includes the initial baseline landscape work which identifies the key corridors to be retained and remain free from development – this evidence base, coupled with the other work undertaken, sterilises a large proportion of the site and we question whether 1,500 dwellings can actually be delivered at an appropriate density in this location. If 1,500 dwellings cannot be achieved we fail to see what the site would act as a sustainable, standalone Garden Village proposal.
- 3.47 In our view, the allocation of land at Wisloe should be removed and instead replaced with strategic-scale development elsewhere, such as Whitminster, and supported by smaller allocations such as land north of Taits Hill Road, Cam. This will broaden the portfolio of the type of sites being put forward, ensuring that SDC can demonstrate a 5YHLS throughout the plan period.



#### 4.0 THE IMPACT ON FIVE-YEAR HOUSING LAND SUPPLY

4.1 As set out within our representations to the Additional Housing Options Paper in January 2021 (a copy of which is available in Appendix G), we have serious concerns over the proportion of growth that is anticipated to come forward from strategic sites within the new Local Plan. This is set out in paragraphs 4.6 – 4.13 of our statement so we will not repeat our discussions in full; however, our primary concern is the ability for these sites to deliver homes early on in the plan period and the effect that this will have on five-year housing land supply (5YHLS). We have undertaken further investigation on this matter with respect to the Delivery & Trajectory set out in Section 7 of the Pre-Submission Local Plan, as well as the existing 5YHLS paper published in November 2020. This takes into account our concerns with the specific allocations raised in the previous section of this statement.

4.2 We have reviewed the most up-to-date 5YHLS paper which includes existing commitments and the remaining current Local Plan allocations which are yet to deliver homes (this does not make any allowance for future allocations such as those in the emerging plan coming forward). We note that the Council currently anticipate the following trajectory over the next 10 years without any new sites coming forward:

Year	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
<b>Deliverable Supply</b>	779	1,045	944	857	752	654	511	259	255	227

Figure 3. SDC's Estimates of Deliverable Sites between 2020 – 2030

4.3 It should be noted that the above figures already include the Hunts Grove Extension site and Sharpness Docks, both of which are allocations being carried forward from the previous plan, which highlights the fact that some sites in the area have taken circa 10 years since they were first earmarked for growth and over 6 years since they were formally allocated, with neither ready to deliver housing. The above figures do not make any allowance for the non-delivery of sites and assume that all commitments and allocations will be delivered.

4.4 Based on the above figures, we have calculated the rolling 5YHLS position below. This is calculated by adding up the anticipated delivery over five years (rolling forward each year) and dividing this by the annual requirement including a 5% buffer (e.g. for April 2022 add the number of homes coming forward through years 22/23 to 26/27 together (3,718 homes) and divide by 662 ( $630 \times 5 = 3,150 + 5\% \text{ buffer} = 3,308 / 5 = 662 \text{ homes per annum}$ )):

Year	Five-Year Housing Land Supply Calculation
2020	6.6
2021	6.4
2022	5.6
2023	4.6
2024	3.7
2025	2.9

Figure 4. Estimates of Rolling 5YHLS Calculation based on existing commitments and allocations in the 2015 Plan

- 4.5 As such, by 2023, Stroud District Council would not be able to demonstrate a five-year housing land supply based on their existing commitments and allocations in the current Local Plan and therefore allocations within the new Local Plan need to be coming 'on stream' by this time, to plug the gap and ensure that there is an adequate supply of new homes.
- 4.6 We note the trajectory set out in Table 6 of Section 7 of the Pre-Submission Plan (extract shown below for ease of reference) aims to show how housing delivery will be front-loaded and a five-year land supply achieved throughout the early parts of the plan period as follows:

Source of housing supply	Projected delivery				Total supply
	2020 to 2025	2025 to 2030	2030 to 2035	2035 to 2040	
Commitments (2019)	3,840	755			4,595
Cam North East Extension		50	130		180
Cam North West	200	700			900
Hunts Grove Extension	166	550	34		750
Sharpness Docks	110	112	78		300
Sharpness new settlement		500	750	1,150	2,400
Stonehouse North West	100	375	225		700
South of Hardwicke		600	600	150	1,350
Wisloe new settlement	50	565	660	225	1,500
Local development sites	116	290	290	289	985
<b>District Total</b>	<b>4,582</b>	<b>4,497</b>	<b>2,767</b>	<b>1,814</b>	<b>13,660</b>
Small sites windfall	150	375	375	375	1,275

Figure 5. Extract of Table 6 showing anticipated delivery of housing in Stroud

- 4.7 We have analysed whether the trajectory is realistic based on the Lichfields 'Start to Finish' Paper: Second Edition, published in February 2020, which provides a useful analysis of timeframes for a different range of applications of varying sizes.

4.8 Lichfield’s analysis indicates the following in respect to timeframes:

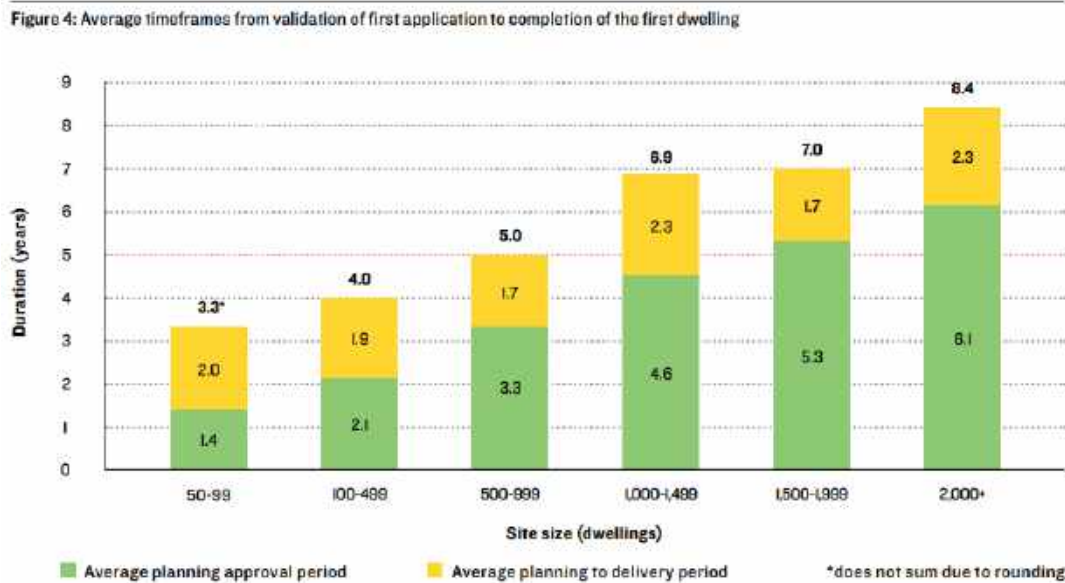


Figure 6. Extract of Lichfield’s ‘Start to Finish’ Paper: Second Edition (February 2020) showing average timeframes from validation of first application to completion of the first dwelling

4.9 Based on these factors, we have then assessed whether it is realistic for the strategic-scale allocations to come forward based on the trajectories set out by the Council.

### Cam North-West

4.10 Cam North-West is an allocation for 900 dwellings. It is anticipated that 200 dwellings would be delivered in years 2020 – 2025 with a further 700 delivered in years 2025 – 2030. This is an average delivery of 40 units per year in years 1-5 of the Plan Period and 140 per annum in years 6 – 10.

4.11 A Scoping Request was submitted for an EIA development of up to 1,100 dwellings (Application Ref: 2020/0314/EIAS) on behalf of Persimmon and Robert Hitchens last year and it is anticipated that a hybrid application will be submitted imminently, including detailed planning permission for the first phases of the residential element of the scheme.

4.12 As such, given that an application is due imminently which will include detailed planning permission for a significant proportion of the site, we consider that the trajectory is reasonable.

### **Cam North-East Extension**

- 4.13 The Cam North-East Extension is allocated for 180 units. It is controlled by Persimmon and Robert Hitchins and no application has been submitted to date. However, the timeframes set out appear to be reasonable in light of the site's constraints and scale of the development proposed.

### **South of Hardwicke**

- 4.14 Land at Hardwicke is allocated for 1,350 dwellings. It is currently anticipated that 600 dwellings will be delivered in years 2025 – 2030, with a further 600 dwellings in the following five years, after which delivery tails off.
- 4.15 Redrow Homes control the site (part freehold, with the balance of land under an option agreement) and the position statement prepared by RPS clearly sets out how the development will begin to delivery homes in years 5 – 10 of the plan period. A planning application will be submitted in Q4 of 2021 which will include detailed elements of the scheme and a dual outlet approach is proposed, which will ensure 120 homes per annum can be delivered. As such, we are comfortable in light of the evidence base submitted that the site is deliverable and will delivered quicker than the Lichfield evidence suggests because there is an evidenced timeframe for the submission of a detailed planning application and Redrow have confirmed that two outlets will be on site, each delivering 60 dwellings per annum.

### **Hunts Grove Extension**

- 4.16 The allocation which constitutes an extension to Hunts Grove will deliver a net increase of 750 dwellings, in addition to the 1,750 that are already allocated. Based on the 'Start to Finish Paper', it would take circa 5 years to obtain approval for the additional land and to see the first homes being delivered. Therefore, it seems unlikely that these homes would be delivered between in years 2020 – 2025 based on this analysis alone and the fact there has been no application submitted to date.
- 4.17 Further to this, it is apparent that a significant proportion of the main Hunts Grove site will need to be built out prior to the additional land coming forward and an access provided to this land given its location on the periphery of the allocation.
- 4.18 According to the latest 5YHLS paper, 603 dwellings of the original 1,750 allocation have been completed, first recorded in April 2012 and therefore equating to an average of 67 per year.

We acknowledge that the level of delivery has increased to circa 120 homes per annum in the last two years and the number of outlets has increased to four more recently (Bellway Homes, DWH, Crest and Bovis), however, given that Crest also control the Hunts Grove extension site, it is highly likely that they will seek to build the majority of their land control out on the original allocation, before pursuing the new land.

- 4.19 It is therefore highly unlikely that homes will be delivered within five years on this extension site in light of the remaining homes to be completed on the original allocation and the time taken to obtain planning permission for a further 750 dwellings. As such, the trajectory should be shifted back to at least years 2025 – 2030, if not 2030 onwards given that it will take a further 9.6 years to build out the current Hunts Grove Allocation based on the recently elevated delivery rate of 120 dpa ( $1,750-603/120 = 9.55$ ).

### **Sharpness Docks**

- 4.20 As we have set out within this statement we have extensive concerns with the Sharpness New Settlement, which need to be addressed if the Plan is to be found sound. In our view this should mean the removal of this allocation and it instead should be replaced with other more suitable and sustainable allocations such as the land at Cam.
- 4.21 Notwithstanding this conclusion, we have also reviewed the likelihood of the trajectory being delivered as planned in respect to the current allocation at Sharpness Docks. Based on Lichfield's Start to Finish, it is anticipated to take circa 4 years from the validation of the application through to delivering the first home on site for a scheme of this size (300 dwellings). An outline application was submitted in April 2017 and is still pending determination (Application Ref: S.17/0798/OUT), with technical issues and comments still to address.
- 4.22 This indicates that the Lichfield's Start to Finish Paper is not wholly accurate (and doesn't proport to be because it is an average) and has demonstrated already the significant difficulty with obtaining permission on a brownfield site such as this one. Given the Conservation Area, Ecological and Listed Building constraints, and no doubt viability issues associated with the site, it is potentially unrealistic to expect RMs to be submitted and approved, with buildings demolished, contamination investigation undertaken, and 110 homes delivered within the next five years.
- 4.23 The Viability Assessment May 2021 paper states *'in taking this approach it remains necessary to be cautious about relying on the brownfield sites to deliver in the early years of the Plan,*

*and the Council should only count on such sites (for example in the five-year housing land supply calculation) where it is confident the site will be forthcoming, for example there is a recent planning consent.'*

- 4.24 The work in this paper also demonstrates that this site is not viable and therefore it is anticipated that a lower level of affordable housing delivery will occur here, if assessments haven't already been submitted.
- 4.25 Accordingly, we consider that a conservative approach should be taken to this site and delivery in the trajectory delayed to years 2025-30.

### **Sharpness New Settlement**

- 4.26 We have already highlighted our concerns with the overall allocation of land at Sharpness and the fact that in our view, this is an unsustainable location for growth that has significant and overwhelming viability challenges. Aside from this, we have also reviewed the trajectory put forward and note the significant level of homes that are anticipated to come forward within the next 10 years.
- 4.27 Based on a high-level review of the Lichfields paper, the first homes would not be delivered for at least 8.4 years. However, given the scale of the scheme proposed and the mitigatory measures and infrastructure that is going to be required to make the development acceptable in planning terms (if that is indeed possible), we cannot envisage an application being submitted prior to the Inspector ratifying any allocation for the site, and the plan being adopted. As such, based on a Local Development Scheme which anticipates adoption in Autumn 2022, even if an application were submitted this year, it would be anticipated that development would not occur until at least 2030. As such, it is unrealistic to assume that 500 homes could be delivered within 2025-30-year period.
- 4.28 Further to this, the level of delivery anticipated in the later stages of the plan period are beyond anything previously achieved across the UK. To compare, Didcot Parkway, one of the best-selling sites in the country, have only achieved circa 350 units per year across 6 outlets (1,750 over a five-year period). Sharpness has no backing from a developer and the site is yet to be market tested, therefore the level of uncertainty is extremely high.
- 4.29 It therefore highly unrealistic that the site will deliver the 2,400 homes envisaged in the plan period and definitely not within the first 10 years of the plan.

### **Stonehouse North-West**

- 4.30 The allocation at Stonehouse North-West is for a further 700 dwellings and is a further extension of the Great Oldbury Drive site which was allocated in the 2015 Local Plan. The site is controlled by Robert Hitchins and Clifton Homes and a detailed application will be submitted in August 2021 for the development. Further to this, the spine road for the original Stonehouse allocation has already been delivered, meaning there is no requirement to wait for access to be provided before homes can be completed in this location.
- 4.31 As such, the assumptions underpinning this allocation and deliverability of the site is reasonable, in light of the evidence presented.

### **Wisloe**

- 4.32 As set out within our previous representations and within other sections of this statement, we have significant concerns in relation to the allocation of this land, not least because it is essentially a further extension of Cam and there is very little evidence to underpin it as a credible and deliverable allocation.
- 4.33 Notwithstanding this, we have again assessed the proposals and whether the trajectory is realistic over the plan period. Based on the Lichfield's paper it would take circa 7 years from the submission of an application through to the delivery of the first home on site. Given this is a GCC controlled parcel of land, and the level of objection from members to this scheme, we do not anticipate that an application would be submitted until the allocation is ratified by the Inspector and / or the plan is adopted for political reasons at least. Currently this is planned for Autumn 2022 (which in itself is ambitious given the delays associated with the preparation of Local Plans and the need for further stages of consultation in respect to modifications to the plan), even if an application were to be submitted immediately it would be surprising if any homes could be delivered prior to 2030. It is therefore highly unrealistic to expect 50 homes to be delivered within the next five years, followed by a significant increase in delivery equating to 565 homes over the following five-year period.
- 4.34 As such, aside from the overall viability and deliverability of this scheme, it is highly unlikely that during the first or second five-year period would homes be delivered.



## Conclusion on the Deliverability of Sites

- 4.35 Having reviewed the strategic allocations set out in the Local Plan, we consider that the timeframes suggested within the trajectory is unrealistic and sites come 'online' much later than anticipated due to the infrastructure requirements and scale of the sites involved.
- 4.36 We therefore question whether, in light of our analysis which identifies that sites will not come forward as planned, SDC will be able to demonstrate a rolling 5YHLS within the first five years of the plan period due to the overreliance on strategic sites that require significant levels of infrastructure to come forward. This is because the allocations will not 'plug the gap' as anticipated by November 2023.
- 4.37 Even the sites we have concluded will come forward within the timeframes anticipated by SDC (because they have been underpinned by evidence), may not be agreed with by an Inspector as part of a 5YHLS assessment. Within a recent appeal decision at Templecombe within South Somerset (Appeal Ref: APP/R3325/W/20/3265558), an Inspector concluded that no outline applications (even those with a pending reserved matters application) could be included within a 5YHLS trajectory, commenting:
- 'To be deliverable, as set out in Annexe 2 of the Framework, where a site has outline planning permission for major development, it should only be considered deliverable where there is clear evidence that housing completion will begin on site within five years. In all of these cases the evidence before me is very limited and largely based on anticipated trajectories assuming reserved matters will be approved in the very near future. This is no certainty before me that this will occur. I must therefore conclude that these sites are not deliverable in the terms of the Framework.'*
- 4.38 Therefore, in our view, our assessment has been conservative by agreeing that some sites could reasonably come forward within five years based on the evidence presented, whereas in reality, they may not be considered as 'deliverable' by an Inspector as part of 5YHLS.
- 4.39 As set out in our representations to the AHO Consultation, this is why a mix and balance of sites is required to ensure choice and competition in the market and to ensure homes will be delivered in a timely manner in the early parts of the plan period to boost housing supply. As the Lichfield's analysis sets out, it is likely that only sites of less than 500 units have the potential to deliver housing in the five-year period (with a proportion offering detailed planning permission from the outset) and it is essential additional sites of a smaller, more deliverable, scale be selected to provide a more balanced portfolio and boost five-year supply



in the early stages of the plan period, while also reducing the current overreliance on strategic scale sites.

## 5.0 **LAND NORTH OF TAITTS HILL ROAD, CAM**

- 5.1 In light of the above evidence, we consider that certain strategic-scale allocations such as Wisloe and Sharpness ought to be removed from the Plan, with the dwellings from these two allocations re-distributed between a new strategic site (Whitminster), and supported by smaller allocations in various sustainable locations in the district, such as land north of Taitts Hill Road, Cam. In our view, this would make policy CP2 sound.
- 5.2 We have previously set out in Section 7 of our representations to the AHO consultation (please see Appendix G) why we consider that the site is a suitable location for growth and our concerns in respect to the overreliance of allocations to the north of the settlement.
- 5.3 Since this time, we have been preparing technical work and have recently submitted a request for pre-application advice to SDC. This is ongoing and we have been receiving technical responses which will inform the scope of a forthcoming application. A summary of the technical work that has been undertaken is below.

### **Technical Assessments**

#### *Highways / Accessibility*

- 5.4 A Transport Note has been prepared by Key Transport Consultants which can be found in Appendix D to this statement. They have identified that there are existing facilities available within a 900m walk including the Cam Family butchers and One Stop Convenience Store on Phillimore Road. A café, delicatessen and takeaway (Leaf and Ground) is also available 900m (12 minutes' walk) to the south, as well as Dursley Rugby Club, Stinchcombe Cricket Club, Stinchcombe Village Hall, Quarry Chapel URC Church, and the allotments at Woodfield Road. Cam Woodfield Infants and Junior Schools lie approximately 1km away.
- 5.5 The Chartered Institute of Highways & Transportation sets out that an ideally walking distance is circa 800m (10 minutes' walk) to everyday facilities and services, but considers that up to 2km could be found acceptable – this is also reflected in the Manual for Streets Guidance.
- 5.6 In addition to this, there are two bus stops available on the southern boundary of the site which carry services 861, X1 and 62 to Bristol, Broadmead and Dursley, which depart roughly every two hours. At the current time there is no discernible bus stop from the road and accordingly, Clifton Homes would be willing to upgrade the primary one going into the centre

to Cam & Dursley. Cam & Dursley contains a range of every facilities for a town centre, as well as a railway line which provides services to Bristol.

- 5.7 We therefore consider that the site lies within an accessible location where residents can reasonably walk, cycle or use public transport to reach everyday facilities, thereby development here would maximise opportunities to travel other than the private car in accordance with NPPF policy.
- 5.8 Further to this, a site access has been designed which meets the relevant standards in respect to the assessed adjacent highway speeds and is a safe and efficient way of accessing the site. The note also sets out the scope of the Transport Assessment work which will be undertaken as part of a forthcoming application.
- 5.9 We would be grateful for your highway officer's advice on the scope of works set out as part of the pre-application response we are seeking.

#### *Ecology*

- 5.10 Ecology surveys of the site are ongoing and initial advice on biodiversity and protected species that was obtained following a site walkover and review of biodiversity records has informed the emerging master plan for the development. A short note has been prepared by Grass Roots Ecology which can be found in Appendix E.
- 5.11 A phase 1 habitat survey was undertaken in July 2020, followed by reptile and bat activity surveys between July – October 2020. This has identified a small population of slow worm and a badger sett within the central hedgerow (which will be closed shortly following a period of monitoring); areas of semi-improved grassland within the eastern field which contain some species of interest; with the rest of the site comprising poor semi-improved grassland.
- 5.12 As such, the main recommendations were to keep the eastern steeper valley element of the site free from development, to provide an enhanced area of habitat; retain and enhance the existing hedgerows and add trees to these features wherever possible.
- 5.13 Initial discussions regarding creating a minimum 10% biodiversity net gain as part of the development have been held and our master planner and ecologist are confident that with the generous open spaces being proposed as part of the proposals this can easily be achieved as a minimum.

### *Flood Risk & Drainage*

- 5.14 A technical note has been prepared by Vectos in respect to Flood Risk & Drainage and is enclosed with these representations in Appendix F.
- 5.15 The site lies within Flood Zone 1 and is therefore at a low risk from flooding; similarly, there are no surface water drainage issues according to the Government's Flood Maps for Planning.
- 5.16 Infiltration testing has been undertaken by Terra Firma which has concluded that the site is suitable to accommodate soakaways and as such the drainage strategy has been based on this solution. If required, this could be supplemented by attenuation which would discharge into the existing stream along the north-eastern boundary of the site.

### *Landscape*

- 5.17 Tyler Grange have been instructed to assess the site in respect of potential landscape impact and have prepared an initial landscape advice plan which can be found in Appendix C. We would appreciate this being issued to your landscape officer for their review and advice.
- 5.18 The site was rejected within the SALA process as it was considered to have a high landscape impact; we do not agree with this assertion for the following reasons:
- It should be noted that the site has existing residential development to both the east and west; and
  - Development in this location, fronting onto the main road, would be seen in the context of the existing built form and would therefore not materially alter views over the area from key viewpoints in the AONB, because the views of this site are already influenced by the urban context.
- 5.19 It is our view that these factors should be given more weight in the assessment of the site's landscape impact; given the strong urban context and the influences that existing development has on it, development here can be sensitively delivered to provide housing in a suitable location without giving rise to significant landscape impact.
- 5.20 Furthermore, as is noted in the Tyler Grange note, development should be kept free in the eastern side of the site to retain a strong wildlife / habitat corridor which will also form a landscape feature to the proposals. In addition, planting has, or will be, proposed in the form of generous buffers to existing hedgerows which will filter views.

5.21 We consider that through suitable urban design and master planning, which responds to the character of the landscape, the concerns raised by the Council as part of the SALA process can be overcome.

### **Conclusion**

5.22 In conclusion we consider that the technical work undertaken is robust and underpins the currently emerging masterplan which can be found in Appendix B to this statement. This provides for up to 60 dwellings and extensive natural recreational space that would benefit existing and new residents alike

5.23 It is our view that the site lies within an accessible location and development here can help boost housing land supply and meet the need for market and affordable homes.

## 6.0 CONCLUSIONS

- 6.1 In summary, we continue to have significant concerns that the current Local Plan strategy relies too heavily on strategic sites. Such sites have no realistic prospect of coming forward within 5 – 10 years which will have a knock-on effect on five-year housing land supply. The Plan therefore fails to be effective in this respect as it does not front-load supply to a degree that provides a robust five-year supply in the first five years of the plan, and thereby does not allow SDC to meet its obligations to maintain such a supply. Such an approach is inconsistent with national policy as a result because it will be ineffective at delivering housing.
- 6.2 We also do not consider the plan to be sound because of a lack of credible evidence to underpin the allocation of land both at Sharpness and Wisloe and we continue to be concerned over the viability and deliverability of these allocations as no robust evidence has been presented to demonstrate how infrastructure has been costed and how development will pay for it, which is likely to be required at an early stage in the development, therefore exacerbating the problem of funding. It is therefore not justified, and consequently unsound.
- 6.3 We therefore consider that the aforementioned strategic allocations should be removed and replaced with more suitable and sustainable locations that already have new infrastructure costed and planned for, where concentrations of jobs already exist to avoid extensive commuting, and facilities are available that are easily accessible via non-car means. This would include at locations such as land north of Taits Hill Road, Cam.
- 6.4 Technical work to date has not identified any significant constraints to the site's development, with the proposals underpinned by a landscape-led strategy to ensure that there will be no adverse effects of the development.
- 6.5 We therefore conclude that the inappropriate strategic allocations of Sharpness and Wisloe should be removed to make the plan sound, and land should instead be allocated across other strategic sites and smaller allocations to ensure a balance of sites are achieved, to boost housing supply in the short-term to ensure that the plan is effective for its lifetime.

**APPENDIX A**  
**SITE LOCATION PLAN – LAND NORTH OF TAIT'S HILL, CAM**

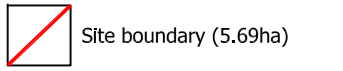


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NORTH

Legend



Site boundary (5.69ha)

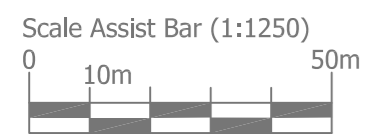


CLIENT:  
Grassroots Planning

PROJECT:  
Land adjacent to Tait's Hill, Dursley

DRAWING TITLE:  
Site Location Plan

SCALE: 1:1250@A2 DATE: 10/05/2021 DRAWN: [Redacted]  
DRAWING NUMBER: 13163/001 REVISION:





**APPENDIX B**  
**EMERGING FRAMEWORK PLAN**





Note:

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**BIG  
PICTURE  
DESIGN**

CLIENT:  
Grassroots Planning

PROJECT:  
Land adjacent to Tait's Hill, Dursley

DRAWING TITLE:  
Framework Plan

SCALE: 1:1000@A2 DATE: 12/12/2020 DRAWN: [Redacted]  
DRAWING NUMBER: 13163/MP3 REVISION:





**APPENDIX C**  
**LANDSCAPE AND VISUAL INITIAL APPRAISAL**



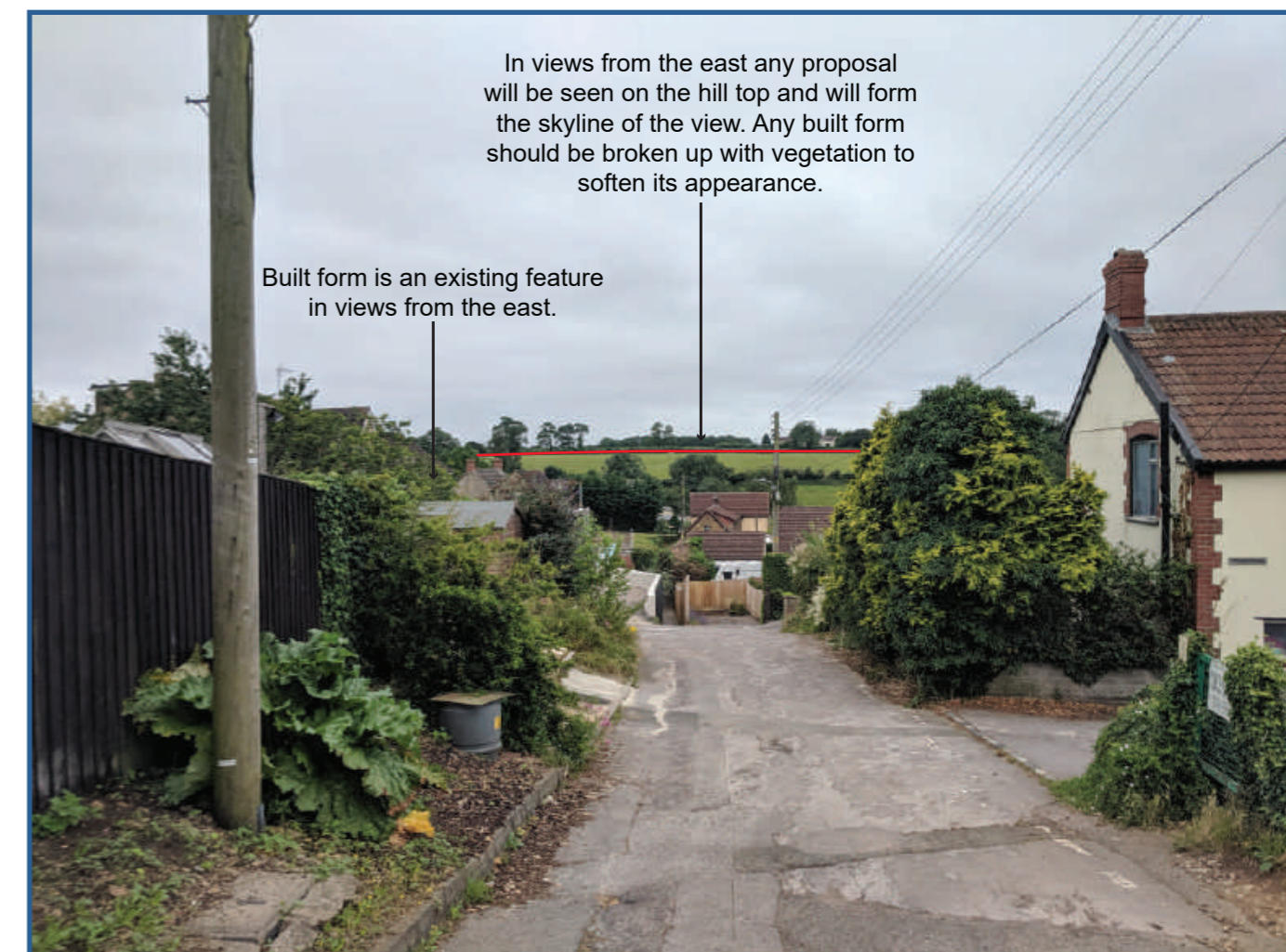


- Site Boundary
- Contours
- Cotswolds AONB
- Cam Settlement Boundary as Identified by Stroud District Council

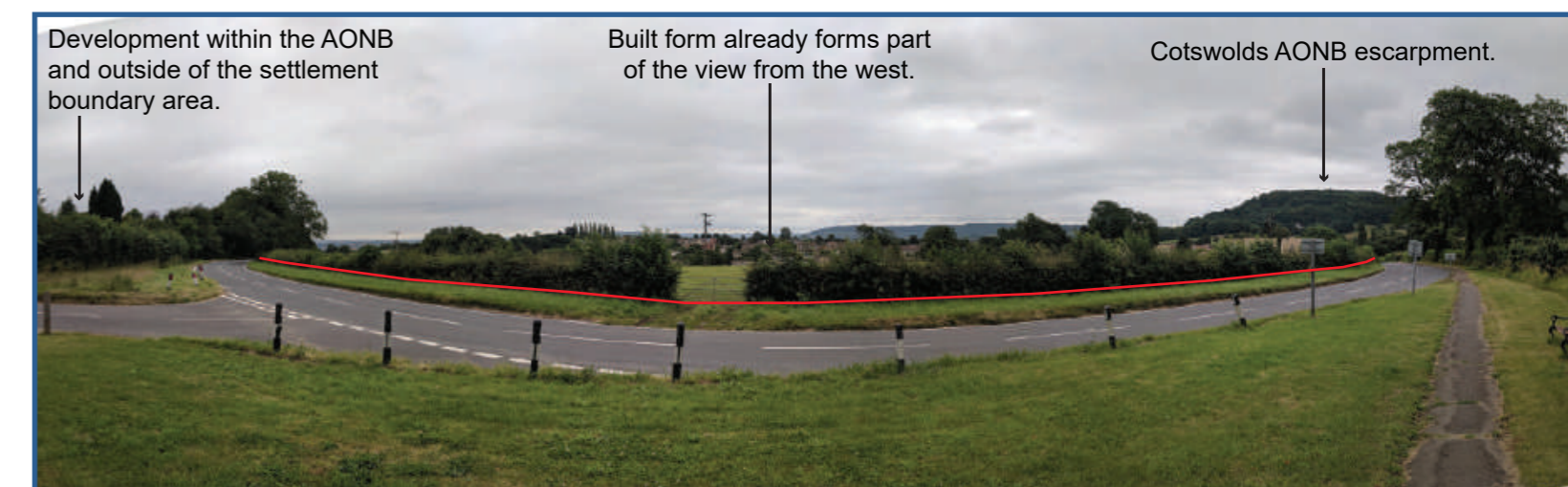
**Local Precedent:**

Planning application - S.14/0966/OUT and subsequent planning appeal - APP/C1625/W/15/3007972. Outcome: Application refused and appeal dismissed.

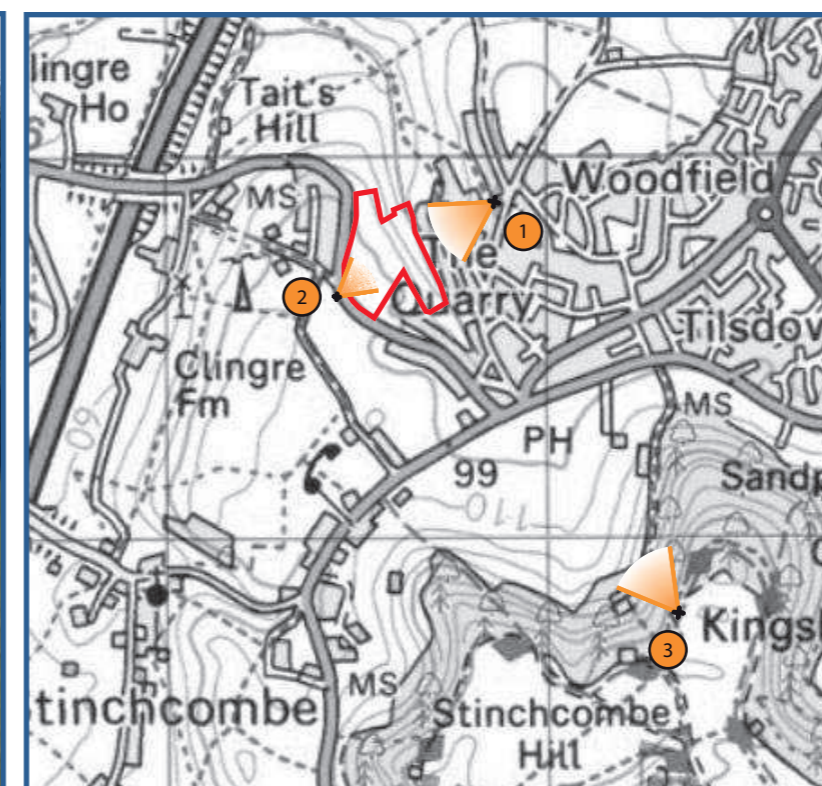
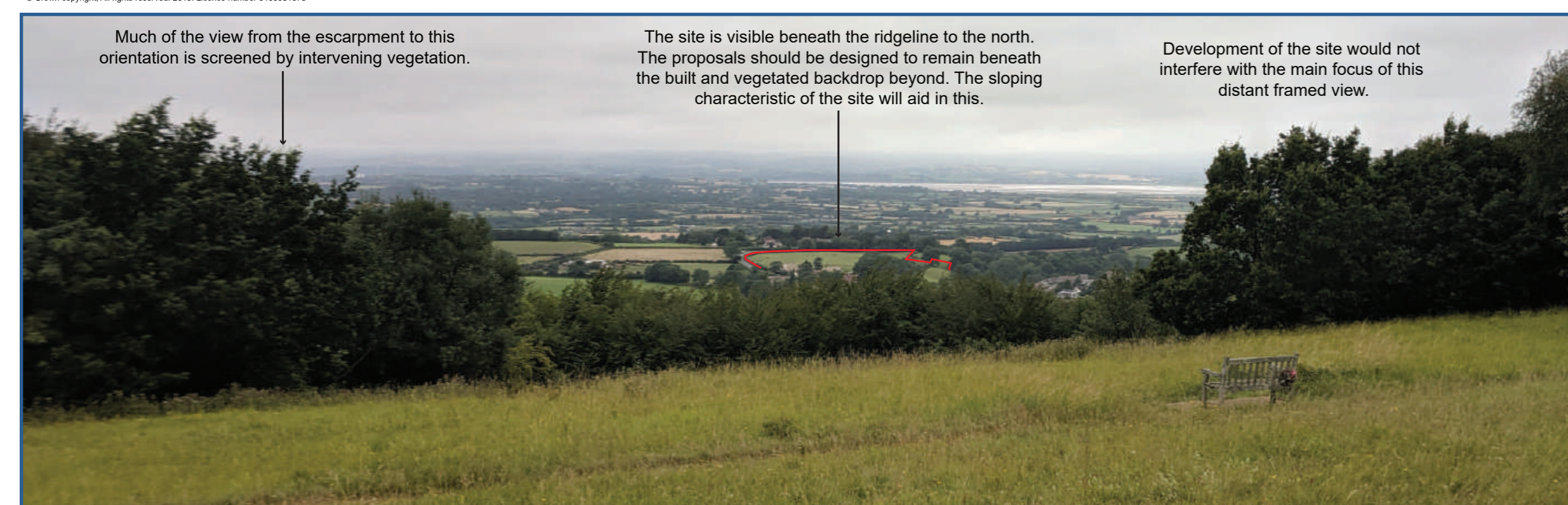
- Application for upto 100 dwellings on land off Shakespeare Road, Dursley.
- Site not within the Cotswold AONB but on the boundary and within the setting of the AONB.
- Cotswolds AONB Board does not lodge an objection regarding the setting of the AONB.
- Inspector cites in his dismissal that *'the proposals would detract from the open qualities of the landscape and reduce views to the countryside and AONB beyond the site'*.
- Any application will need to consider the findings of this application and appeal.



**Photoviewpoint 1:** Taken from Westend to the east of the site.



**Photoviewpoint 2:** Taken from the footpath adjacent to Tait's Hill Road, west of the site and within the AONB.



Project	Tait's Hill, Cam
Drawing Title	Landscape and Visual Initial Advice Plan
Scale	Not to Scale
Drawing No.	12555/P01
Date	July 2019
Checked	



**Photoviewpoint 3:** Taken from the Cotswolds Escarpment at Public Right of Way, CAM BRIDLEWAY 125. South east of the site and within the Cotswolds AONB.



**APPENDIX D**  
**TRANSPORT NOTE**



# Technical Note

<b>Title</b>	Taits Hill, Dursley		
<b>Prepared by</b>	██████████	<b>Checked by</b>	<b>Reviewed by</b>
<b>Date</b>	December 2020	<b>Version</b>	2.0

## 1. INTRODUCTION

- 1.1. Key Transport Consultants Ltd (KTC) is instructed by Clifton Homes to provide transport advice in respect to a proposed residential development on land at Taits Hill, Dursley. The location of the site is just to the west of the built-up area and shown on the attached Figures 1 and 2.
- 1.2. The purpose of this Technical Note is to provide context to the transport issues and set out the proposed scope of the transport documents that would accompany the planning application with a view to agreeing the scope with Stroud Council/Gloucestershire County Council.
- 1.3. The proposal is for approximately 60 houses. Cycle and Car parking would be in line with the standards set out in Manual for Gloucestershire Streets.

## 2. SITE LOCATION & LOCAL TRANSPORT NETWORK

### Local Transport Network

- 2.1. Tait's Hill Road is a two-way road which extends from Tait's Hill to the north and Dursley Road to the south. Tait's Hill has a 30mph speed limit at the point where it becomes Tait's Hill Road. This speed limit is maintained until approximately 100m into Dursley Road when the speed limit increases to 40mph. Dursley Road leads north-west towards Cam which then meets the A4135. The A4135/ Dursley Road junction is a three-arm single lane mini roundabout. The A4135 leads north to Cam centre and south to Dursley centre.
- 2.2. North of site, after approximately 700m Tait's Hill becomes the B4066 which then leads to the A38 Bristol Road which provides links to Bristol and Gloucester and the M5.
- 2.3. Tait's Hill Road has street lighting from Dursley Road for approximately 350m. The remaining road from this point to Tait's Hill remains unlit.

### Pedestrian and Cycle Facilities

- 2.4. A continuous footway is provided on the southern side of Tait's Hill Road. Dursley Road has footways on both the north and south. The avenue has a footway provided on the south. A northern footway runs from Tait's Hill Road along The Avenue for some 30m. No footway is provided along Tait's Hill.

## 3. POLICY CONTEXT

## National Planning Policy Framework

- 3.1. Government sustainable transport policy is set out in the National Planning Policy Framework revised in July 2018 which states.

### ***“Promoting Sustainable Transport***

*102 Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

*103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*

*104. Planning policies should:*

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*
- d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);*
- e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and*

*f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.*

*105. If setting local parking standards for residential and non-residential development, policies should take into account: a) the accessibility of the development;*

*b) the type, mix and use of development;*

*c) the availability of and opportunities for public transport;*

*d) local car ownership levels; and*

*e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

*106. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.*

*107. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.*

### **Considering development proposals**

*108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

*a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

*b) safe and suitable access to the site can be achieved for all users; and*

*c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

*109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

*110. Within this context, applications for development should:*

*a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*



- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

*111. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.*

### **Achieving appropriate densities**

*122. Planning policies and decisions should support development that makes efficient use of land, taking into account:*

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed, attractive and healthy places.*

*123. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:*

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*
- c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance*

*relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)."*

### **Planning Practice Guidance**

3.2. The Planning Practice Guidance has been updated and released online. The online resource makes reference to Transport Assessments where it is stated:

*'The scope and level of detail in a Transport Assessment or Statement will vary from site to site but the following should be considered when settling the scope of the proposed assessment:*

- *information about the proposed development, site layout, (particularly proposed transport access and layout across all modes of transport)*
- *information about neighbouring uses, amenity and character, existing functional classification of the nearby road network;*
- *data about existing public transport provision, including provision/ frequency of services and proposed public transport changes;*
- *a qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport that would result from the development and in the vicinity of the site;*
- *an assessment of trips from all directly relevant committed development in the area (i.e. development that there is a reasonable degree of certainty will proceed within the next three years);*
- *data about current traffic flows on links and at junctions (including by different modes of transport and the volume and type of vehicles) within the study area and identification of critical links and junctions on the highways network;*
- *an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent three-year period, or five-year period if the proposed site has been identified as within a high accident area;*
- *an assessment of the likely associated environmental impacts of transport related to the development, particularly in relation to proximity to environmentally sensitive areas (such as air quality management areas or noise sensitive areas);*
- *measures to improve the accessibility of the location (such as provision/ enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms;*
- *a description of parking facilities in the area and the parking strategy of the development;*
- *ways of encouraging environmental sustainability by reducing the need to travel; and*
- *measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads.*

*In general, assessments should be based on normal traffic flow and usage conditions (e.g. non-school holiday periods, typical weather conditions) but it may be necessary to consider the implications for any regular peak traffic and usage periods (such as rush hours). Projections should use local traffic*

forecasts such as TEMPRO drawing where necessary on National Road Traffic Forecasts for traffic data.

*The timeframe that the assessment covers should be agreed with the local planning authority in consultation with the relevant transport network operators and service providers. However, in circumstances where there will be an impact on a national transport network, this period will be set out in the relevant Government policy.'*

## **Local Policy**

### **Gloucestershire's Local Transport Plan (LTP3) (2015-2031)**

- 3.3. The Gloucestershire County Council (GCC) LTP3 is currently out for consultation but remains the current "living document" setting out the transport strategy for Gloucestershire up to 2031.

*"It aims to influence how and when people choose to travel so that individual travel decisions do not cumulatively impact on the desirability of Gloucestershire as a place to live, work and invest.*

*'A resilient transport network that enables sustainable economic growth by providing door to door travel choices'"*

#### LTP3 Policy Document PD6 – Thinktravel

- 3.4. 'Thinktravel' is the brand name for Gloucestershire's smarter choices programme, designed to help people consider their travel choices and encourage use of more sustainable modes of transport. This encompasses behavioural and operational initiatives to encourage and support a smarter approach to journey decision making, planning and undertaking.
- 3.5. The outcomes of this behavioural change are a reduction in the number of single occupancy car trips, a greater awareness of travel choices and promotion of the 4Rs (Reduce, Retime, Reroute, Remode) to journeys to avoid the most congested times and locations on Gloucestershire's transport network.
- 3.6. Nationally and locally there is a growing understanding that, whilst (hard - physical) transport infrastructure is necessary for a modern transport system, this needs to be supported by (soft – behavioural or operational) smarter measures. These consist of a wide range of tools which provide people with the information, incentives and support to walk, cycle, use public transport or car share instead of travelling as a solo car user.
- 3.7. Policy LTP PD 6.1 outlines that the Thinktravel travel promotion and implements policies which include:
- *Work with its partners to reduce single occupancy car use by providing and promoting alternative travel choices to individuals through a variety of media types*
  - *Deliver campaigns to increase cycling, walking and public transport use across all segments of the population within Gloucestershire but targeting, in particular, those with the greatest propensity to use alternatives to the car*
  - *Work with local businesses, educational establishments and housing developers to secure appropriate travel plans to encourage sustainable travel*

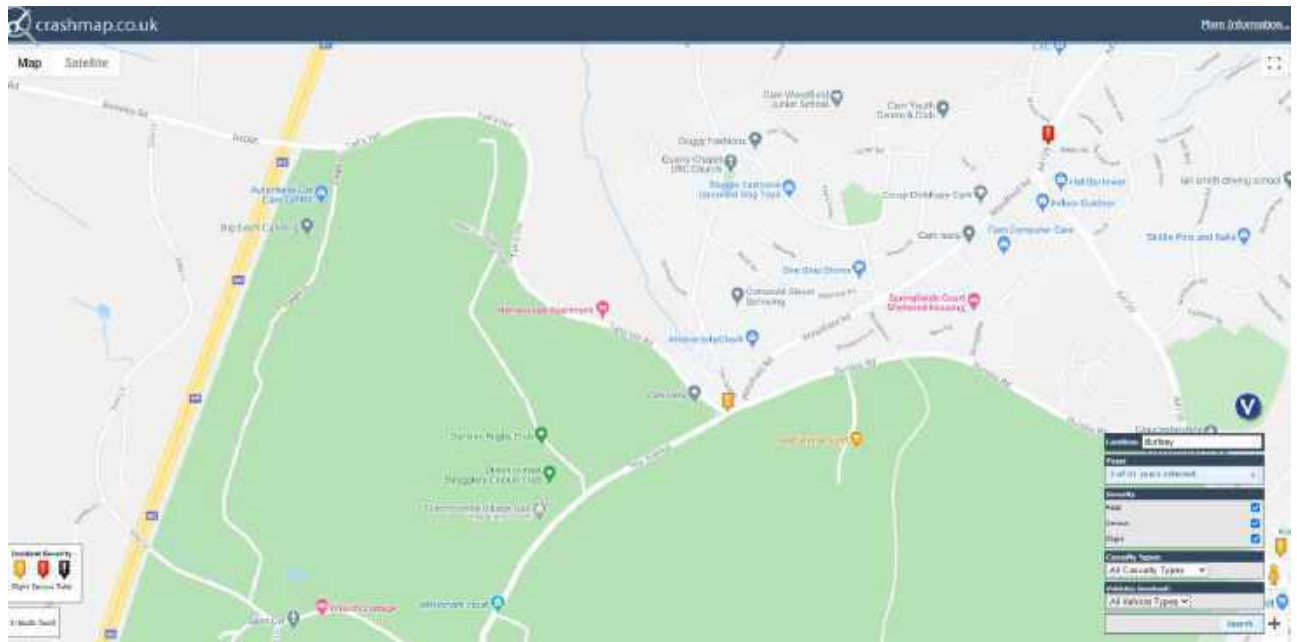
- *Within Travel Plans, support the promotion of walking & cycling for journeys under 2km and 5km respectively. Promotional material will be issued alongside infrastructure improvements using methods that have been tested nationally and applied effectively through the Local Sustainable Transport Fund Programme in Gloucestershire*
- *Ensure accurate service availability, timetable information and location information is available at all bus stops and railway stations within the county and through the Thinktravel website (www.thinktravel.info). In addition GCC will continue to use social media to disseminate information and provide it in a variety of formats to meet customer expectations*
- *Maintain the phased introduction of Real Time Passenger Information systems where it is technically and financially viable to do so and; improving the quality of information provided at passenger waiting facilities, the Thinktravel travel information portal and other travel applications that may be provided through mobile phone based technologies*
- *Work with partners and providers to embrace technologies which secure benefits such as additional charging points for electric vehicles, the promotion of reduced carbon emissions transport, reduced traffic congestion and/ or which makes travel choice smarter and more sustainable*

3.8. In addition, LTP PD 6.2 – Managing car use from new developments GCC will liaise with Local Planning Authorities and developers to secure Development Plan compliant contributions from developers, businesses and local partners to deliver travel plans and promote smarter travel choices including marketing and incentives to encourage sustainable travel and ensure that realistic opportunities for travel choice are taken up in new developments. GCC will do this by implementing the following policy proposals:

- *To require the use of travel plans for new development in accordance with the Planning Practice Guidance (or subsequent related guidance). Where a development is deemed to require a Travel Plan to aid mitigating the scale of impact on the highway network*
- *To use Personalised Travel Planning (PTP) as part of the toolkit of measures for delivering smarter travel choices, where appropriate, in new and existing residential developments*
- *To secure, monitor and enforce Travel Plans for developments where such plans are deemed necessary and in compliance with Department for Communities and Local Government Planning Practice Guidance 2014*
- *To promote car-sharing in order to encourage sustainable car use within new employment developments and in association with businesses within Gloucestershire.*

## **HIGHWAYS SAFETY**

3.9. Details of Personal Injury Accidents (PIAs) recorded in the area will be obtained and considered. A plot of accidents obtained from Crashmap is provided below. It shows that in the last three years (data to 2019) there has only been one reported injury accident in the vicinity of the site.



#### 4. ACCESSIBILITY

- 4.1. This section considers accessibility by alternative modes from the development site to jobs, shops, services and local facilities identified in this section are shown on Figure 2.
- 4.2. The National Travel Survey (NTS): 2019 published in August 2002, provides details of all trips per person per year, and is shown in Table 6.1 below. This provides clear evidence of the relationship between distance and probability of different modes of transport. The analysis shows that walking is the dominant mode for trips under 1.6km (79.81%).
- 4.3. For distances over 1.6km but less than 3.2km, use of a car is the most popular mode of travel (58.9% for car driver and passenger), while walking is the second most popular mode, chosen by almost a third (31.03%).

Table 4.1: Proportion of Total Trips by Mode and Distance							
Modal Split by Distance							
Distance	Car Driver	Car Passenger	Bus	Train	Walk	Cycle	Other
0 - 1.6km	11.26%	6.58%	0.70%	0.0%	79.81%	1.06%	0.58%
1.6 - 3.2km	36.98%	21.94%	5.03%	0.07%	31.03%	2.40%	2.10%
3.2 – 8km	51.59%	27.22%	9.88%	0.63%	4.04%	2.40%	4.24%
All Journeys	39.89%	21.01%	5.28%	2.23%	26.23%	1.70%	3.66%

- 4.4. The Guide to Better Practice accompanying PPG13 Transport has been withdrawn since the publication of the Planning Practice Guidance. Nevertheless, section 2.05 of the withdrawn guidance is still considered relevant and states:

*“Where distances exceed 1 mile (about 1.6km) only a small proportion of people will walk. Where distances exceed about 5 miles (8km) only a small proportion of people will regularly cycle, even where good facilities are provided. Other modes are less sensitive to distance, but motorised modes are rarely used for trips of around half a mile (0.8km) or less.”*

4.5. The NTS 2011 states the following:

*“For trips to school under 1 mile in length, walking was the most prevalent mode of travel for both primary and secondary school children, accounting for 84% and 89% of trips respectively. For longer school trips, the most popular mode for primary school children is by car, with 76% of 2 to 5 mile trips, and 80% of trips over 5 miles made by this mode. For secondary school pupils 53% of all trips of 2 to 5 miles in length, and 66% of trips over 5 miles are made by bus.”*

4.6. The transport report that will accompany the planning application will describe the existing situation including the characteristics of the local transport network, pedestrian and cycle facilities, and public transport services.

4.7. Local facilities and services will be identified on a plan with details of their relative distances from the development site. Local facilities include Cam Family butchers, hairdressers and One Stop convenience store some 900m walk (12 minutes) from the site on Phillimore Road. The recently opened Leaf and Ground to the south, some 900m walk (12 minutes) includes a café, delicatessen and takeaway.

4.8. Cam Woodfield Infants and Junior Schools are around a 1km walk (14 minutes) from the site to the east. Cam Nursery is also around 1km walk from the site.

4.9. Stinchcombe Village Hall is around 850m walk (12 minutes) and has exercise and yoga classes as well as meetings by various societies.

4.10. The distances to the facilities above are within 1 mile, and therefore based on National Travel Survey information, journeys are most likely to be made on foot.

4.11. Travelwest isochrone plots appended to this note show all of Cam is within a 30-minute walk of the site, and the cycling map shows Dursley is within a 20-minute cycle, and Sharpness, Berkeley and Cambridge are within a 30-minute cycle.

### **Public Transport**

4.12. The nearest bus stops to the site are just north of the site access where Tait's Hill becomes Tait's Hill Road. There are no raised bus boarders, flags, timetables or shelters and we propose that the development contribute towards such improvements for the benefit of existing and new residents. Based on Google Maps, the stops are served by the 861, X1 and 62 services. It is therefore evident that a range of bus services serve the site and locating development here achieves the NPPFs aims of providing an alternative public transport option to the private car.



4.13. The public transport isochrone plot attached to this note shows that Wooton-under-Edge, Sharpness and Berkeley are within a 30-minute bus journey.

## 5. ASSESSING THE TRAFFIC IMPACT

5.1. TRICS is a database of traffic counts undertaken at various developments around the country. The TRICS database has been used to calculate a trip rate for the proposed development. Sites were selected with similar location characteristics. Sites in London were excluded due to the much higher level of public transport and in Ireland, due to differing transport policies that might have an impact on their trip rates.

### *Residential Trips*

5.2. In order to calculate trip rates that most accurately represented the area, TRICS was used to calculate people trip rates for private houses and is summarised in the table below.

<b>Table 6.2: Proposed Private Houses Use</b>						
	<b>AM Peak (08:00 to 09:00)</b>			<b>PM Peak (17:00 to 18:00)</b>		
	<b>Arr</b>	<b>Dep</b>	<b>Tot</b>	<b>Arr</b>	<b>Dep</b>	<b>Tot</b>
Trip Rate -people	0.154	0.677	0.831	0.608	0.218	0.826
Trips	9	41	50	36	13	49

5.3. We have reviewed 2011 census data for the area which showed that 81% of residents travelled to work by car/van. When multiplied by the people trips calculated above, the following vehicle trips have been estimated.

<b>Table 6.2: Proposed Private Flats Use</b>						
	<b>AM Peak (08:00 to 09:00)</b>			<b>PM Peak (17:00 to 18:00)</b>		
	<b>Arr</b>	<b>Dep</b>	<b>Tot</b>	<b>Arr</b>	<b>Dep</b>	<b>Tot</b>
Trips	7	33	40	30	11	40

5.4. The table above shows that the development would generate roughly one car every 90 seconds in the peak hours.

5.5. For the planning application, workday destination Census data would be examined to distribute the traffic onto the wider road network. However, given the relatively low traffic flows, junction capacity assessments are not envisaged.

### **Site Access**

- 5.6. Drawing 1064-001 attached to this note shows the proposed access. The access has visibility splays of 2.4 x 43m in each direction. The access road has been drawn at 5.5m wide with footways on each side and radii of 10m.
- 5.7. Pedestrians would cross the road via an uncontrolled crossing to the footway on the western side.

### **Travel Plan**

- 5.8. A Travel Plan (TP) will be produced to cover the residential development.

## **6. CONCLUSIONS**

- 6.1. The contents of this Scoping Note will be discussed in detail with Stroud Council/Gloucestershire County Council and to agree an appropriate approach and methodology to develop a suitable TS and TP for the site.
- 6.2. In summary the site offers a sustainable location for development in transport terms, being accessible by cycle or foot to a range of everyday facilities and public transport is a viable and attractive travel option. Furthermore, a safe and suitable access into the site has been designed. Therefore, it is our option there is no impediment in transport and highways terms to the site being either allocated for development in the emerging development plan, or granted planning permission in the shorter term to assist the council in demonstrating a five year housing land supply.

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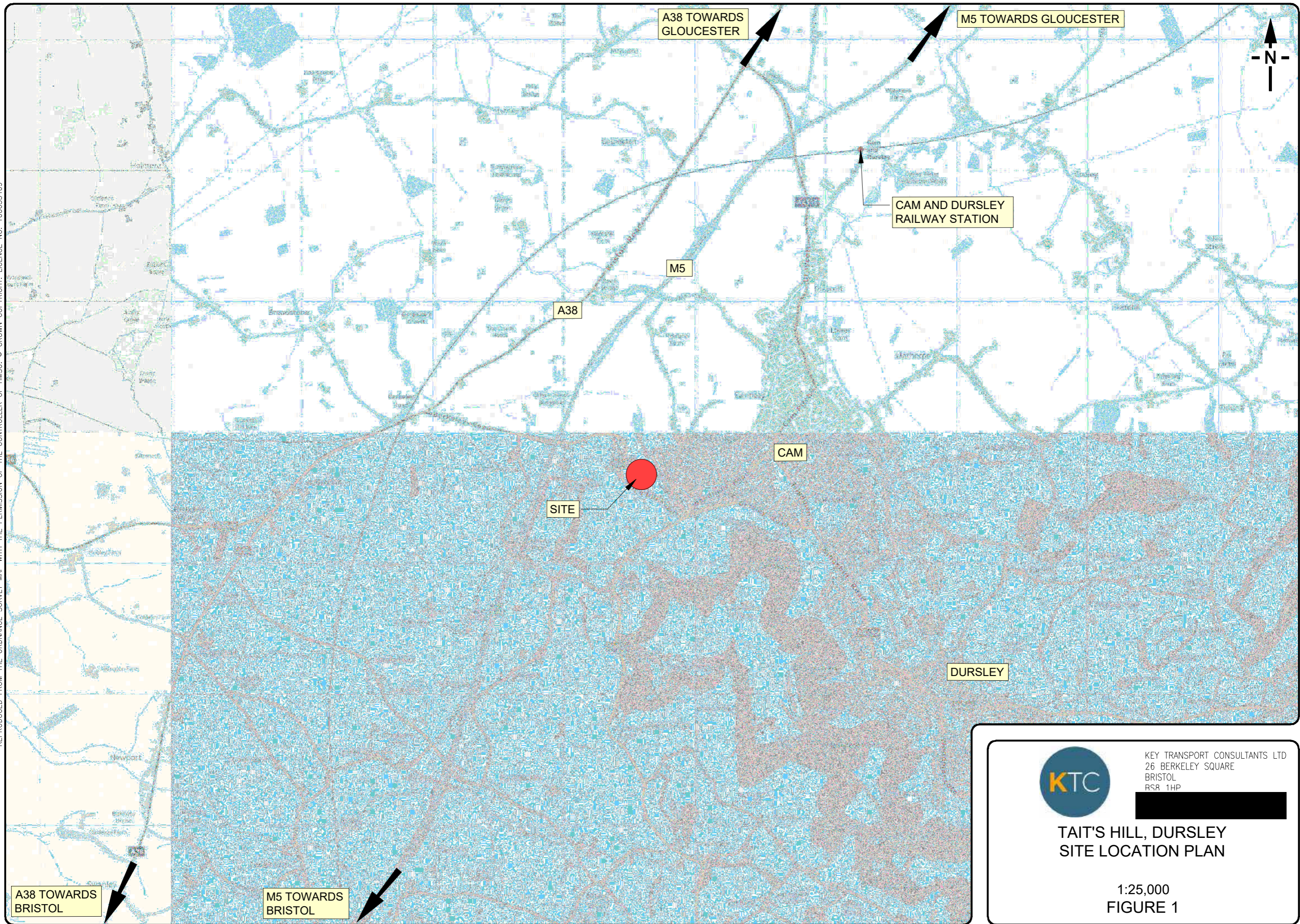
[www.key-transport.com](http://www.key-transport.com)



## FIGURES



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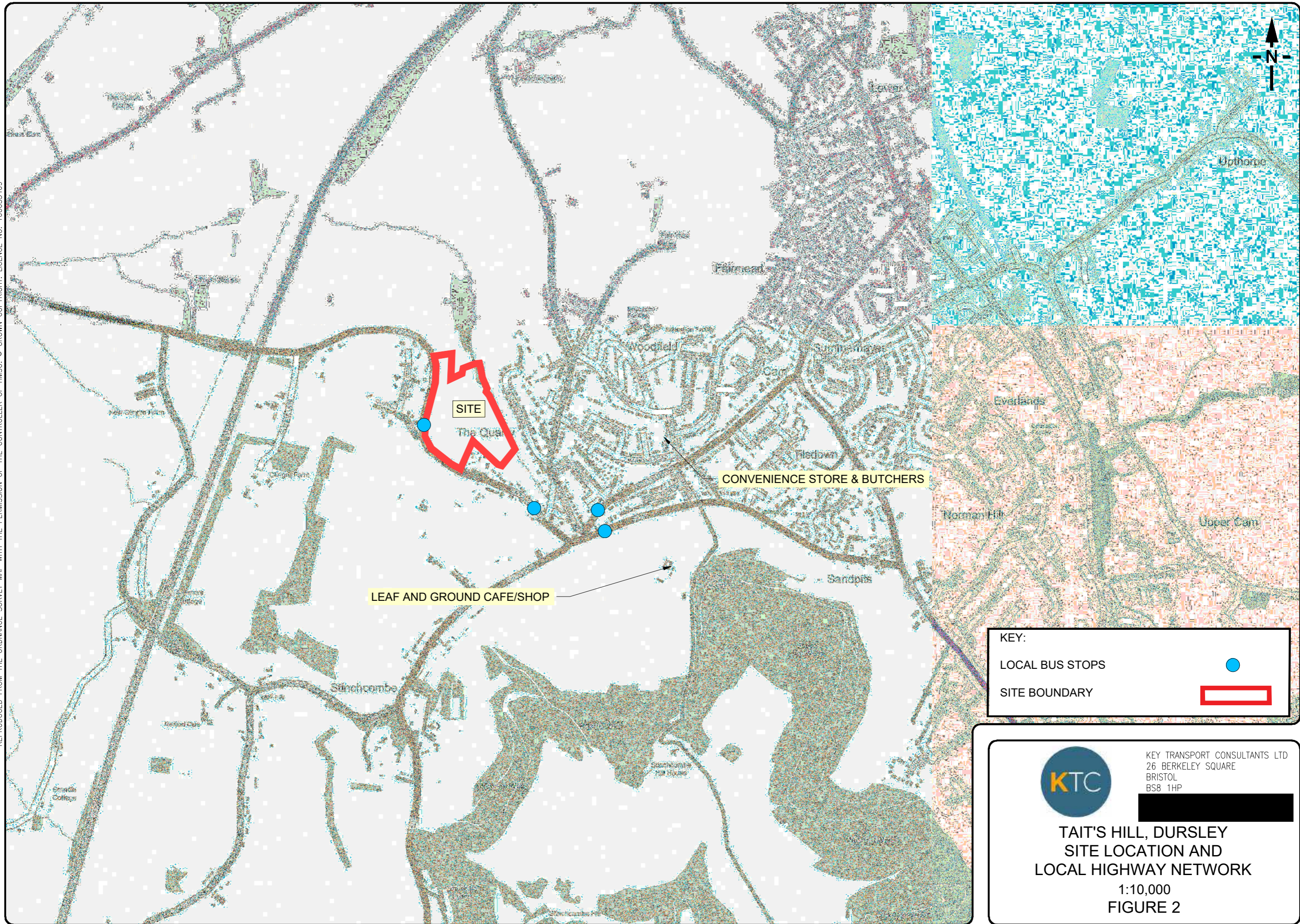
KEY TRANSPORT CONSULTANTS LTD  
26 BERKELEY SQUARE  
BRISTOL  
BS8 1HP

TAIT'S HILL, DURSLEY  
SITE LOCATION PLAN



1:25,000  
FIGURE 1




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KEY:

- LOCAL BUS STOPS 
- SITE BOUNDARY 

 KEY TRANSPORT CONSULTANTS LTD  
26 BERKELEY SQUARE  
BRISTOL  
BS8 1HP

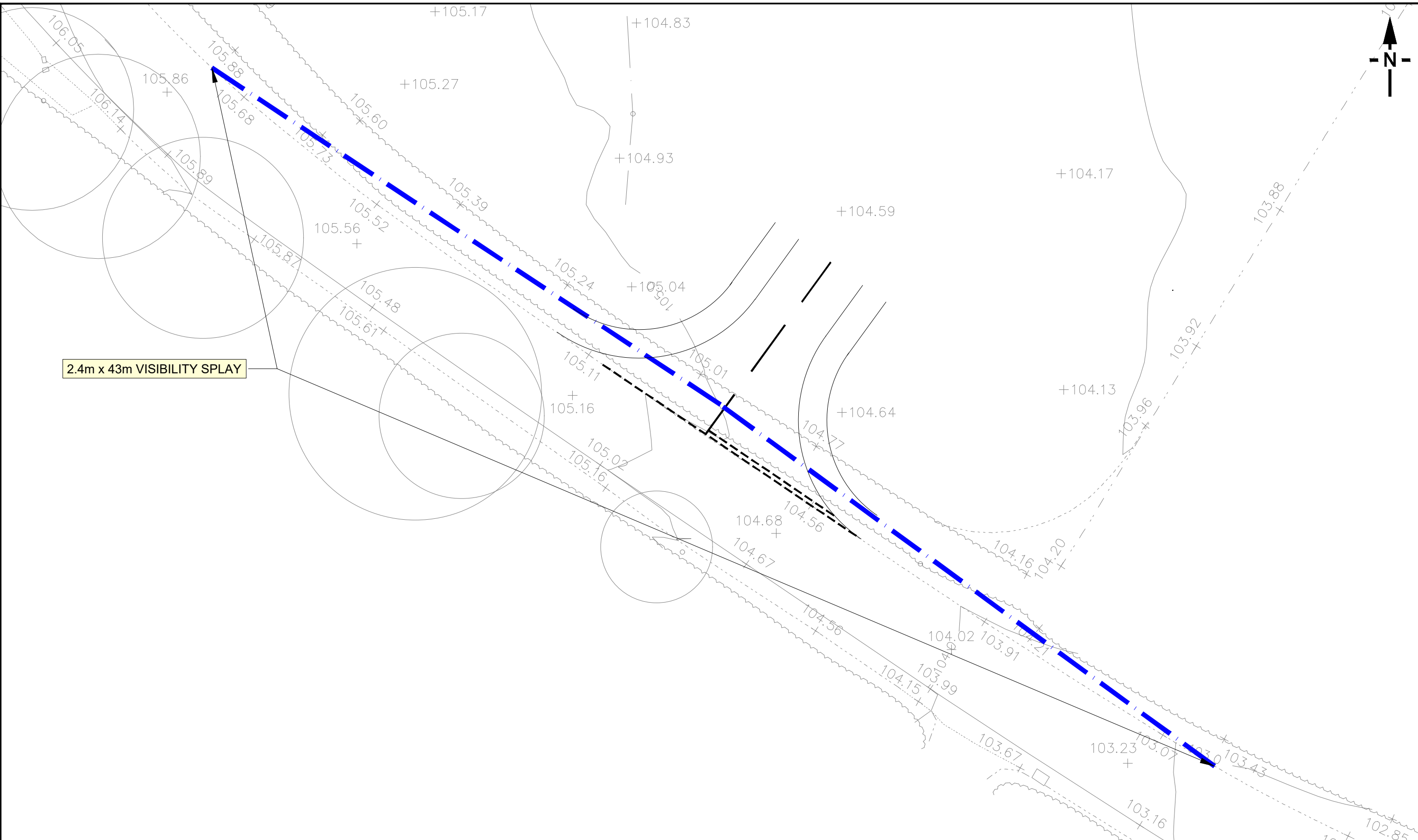
**TAIT'S HILL, DURSLEY  
SITE LOCATION AND  
LOCAL HIGHWAY NETWORK**

1:10,000  
FIGURE 2



## **SITE ACCESS DRAWING**

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2.4m x 43m VISIBILITY SPLAY

<b>TAITS HILL, DURSLEY</b>						 KEY TRANSPORT CONSULTANTS LTD 26 BERKELEY SQUARE BRISTOL BS8 1UD	
<b>PROPOSED ACCESS</b>							
DRAWN BY	CHECKED BY	PASSED BY	DATE	SCALES @ A3 SIZE	ISSUE STATUS	DRAWING NUMBER	REV.
█			AUG 20	1:500	PRELIMINARY	<b>1064-001</b>	

REV	DR	CH	PA	DATE

CAD FILE NAME : F:\DATA\Jobs\1064 Tait's Hill, Dursley\AutoCAD\1064-001.dwg

# TRAVELWEST ISOCHRONE PLOTS



# Explore the Map

Enter a location to see how far you can travel on foot, bicycle or public transport in the West of England.

Taits Hill Road, Dursley, GL11 6, England

Mode of transport:

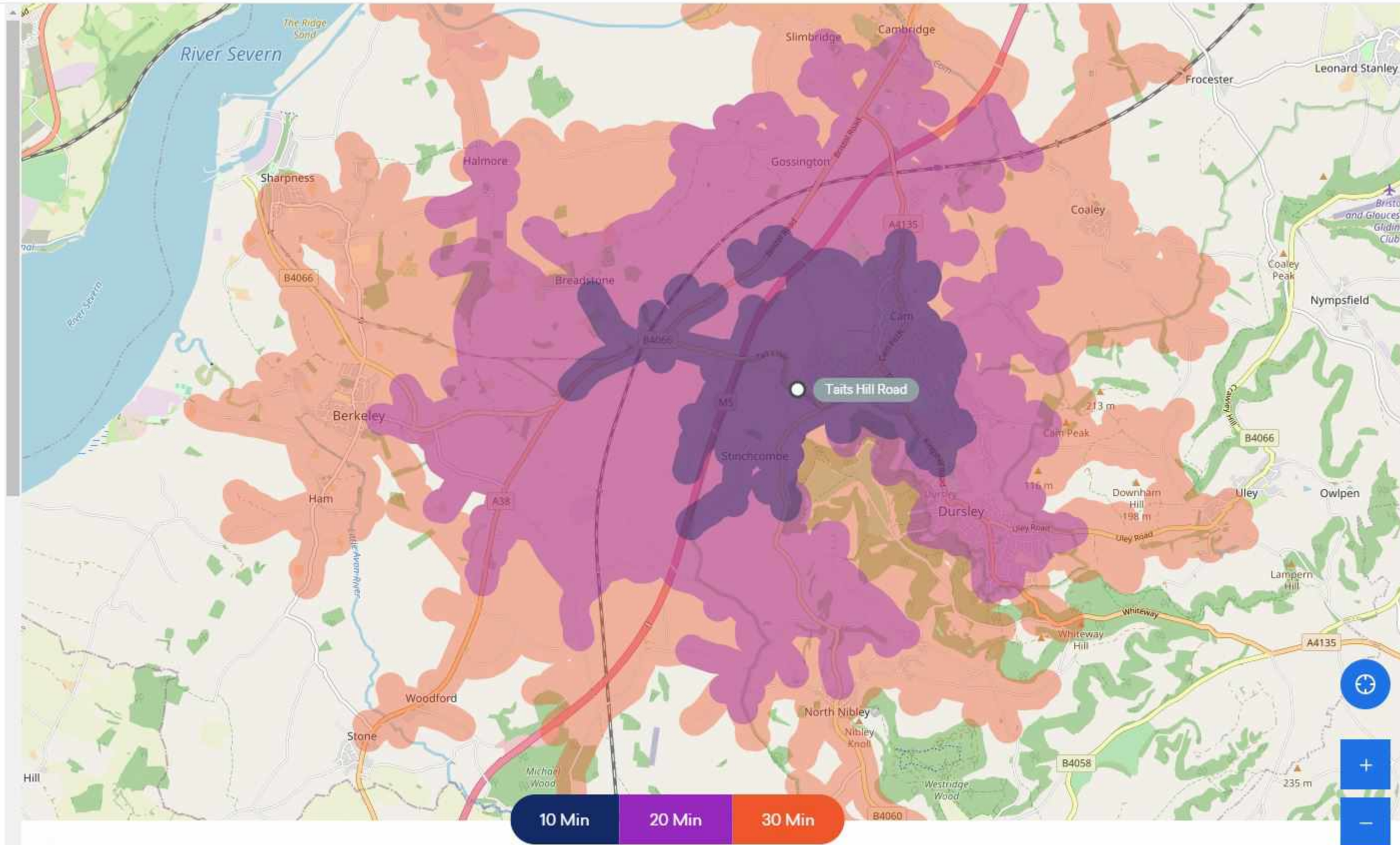


Within: 30 minutes

Update Map

Include points of interest on the map

- Car Clubs
- Charge Points
- Park & Ride
- Car Parking



10 Min 20 Min 30 Min



# Explore the Map

Enter a location to see how far you can travel on foot, bicycle or public transport in the West of England.

Taits Hill Road, Dursley, GL11 6, England

Mode of transport:



Reset options

Depart: 16/12/2020 08:00

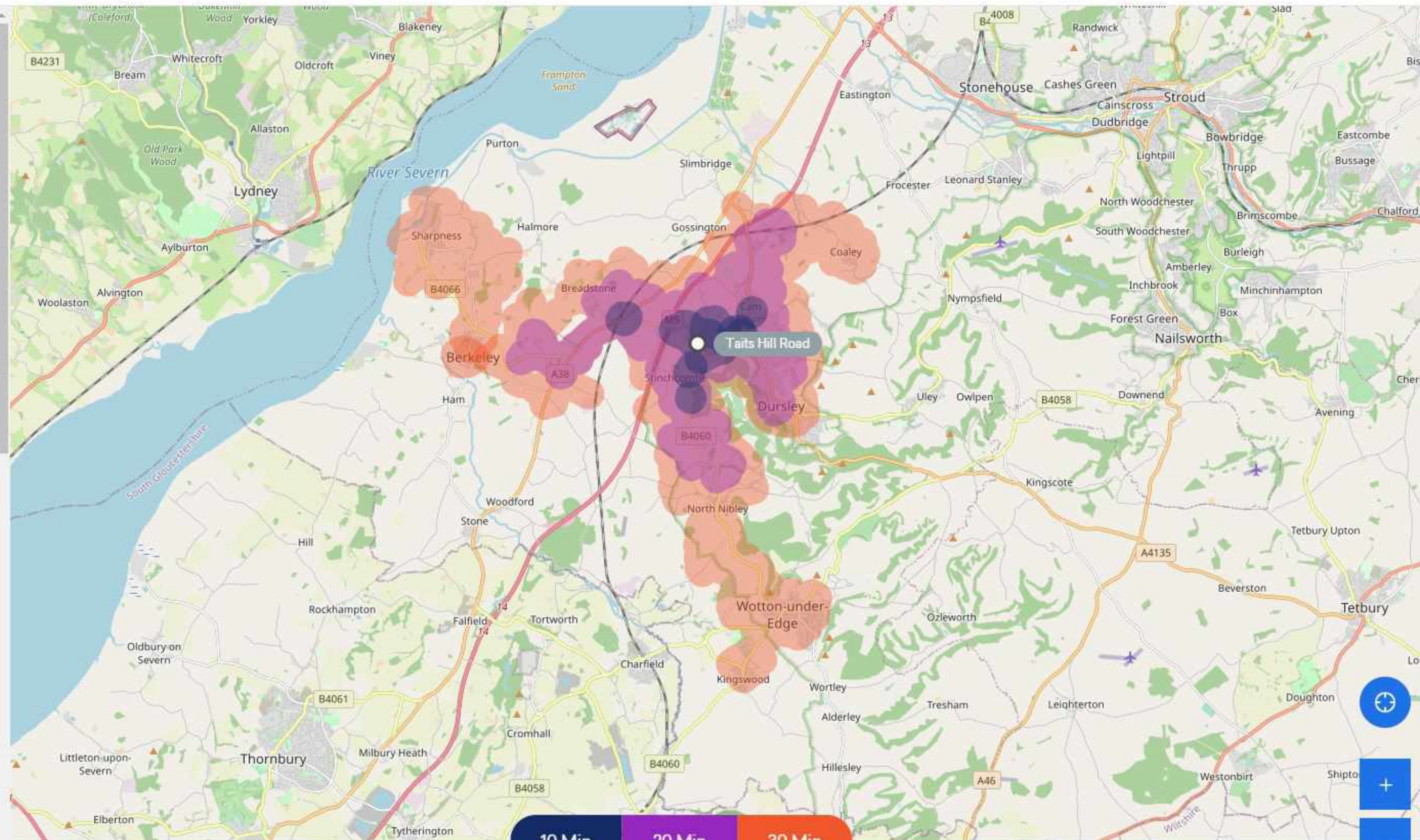
DEPART AFTER

16 Dec 2020 8 : 00

Within: 30 minutes

Update Map

Include points of interest on the map





# Explore the Map

Enter a location to see how far you can travel on foot, bicycle or public transport in the West of England.

Taits Hill Road, Dursley, GL11 6, England

Mode of transport:

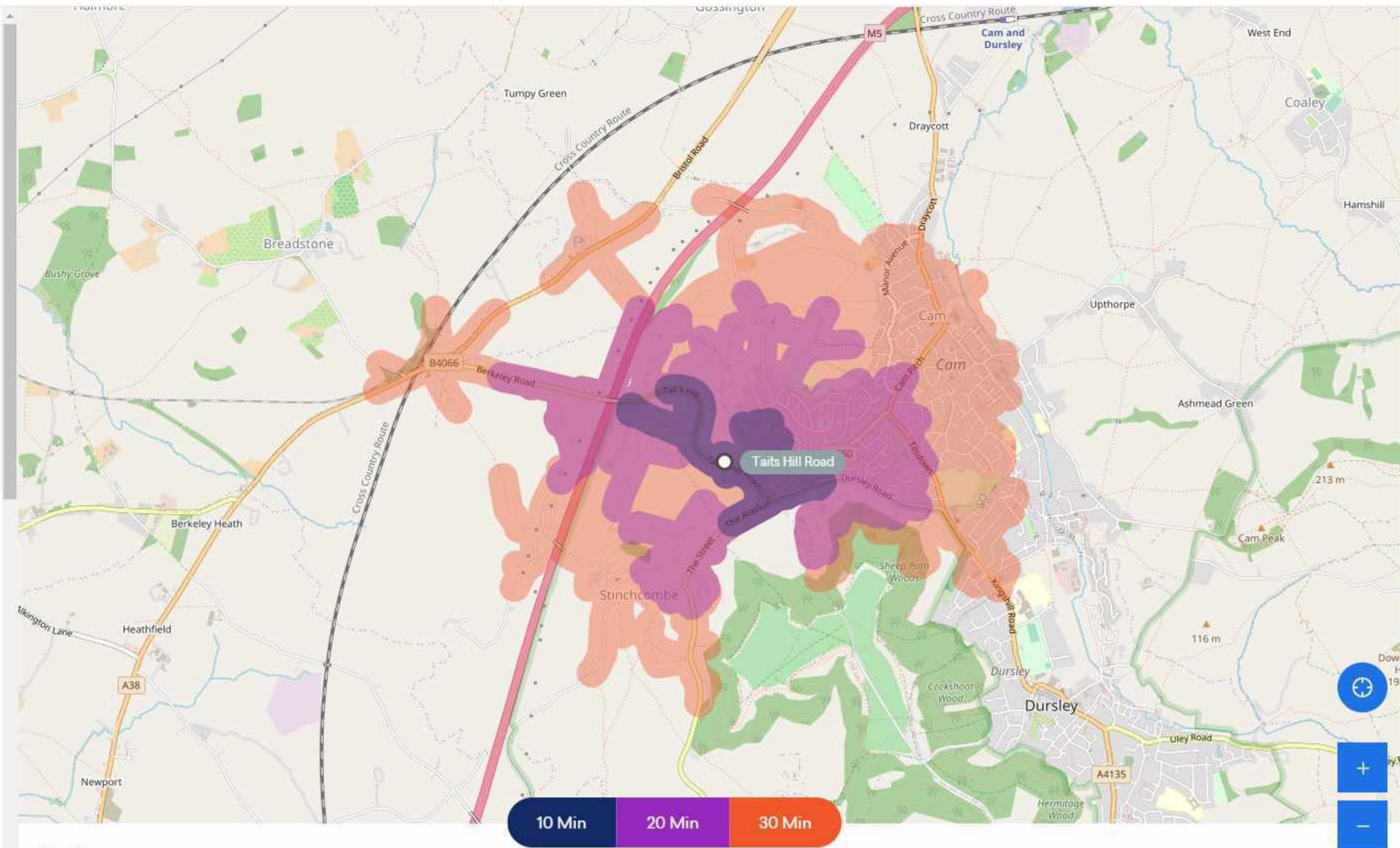


Within: 30 minutes

Update Map

Include points of interest on the map

- Car Clubs
- Charge Points
- Park & Ride
- Car Parking



**APPENDIX E**  
**ECOLOGICAL APPRAISAL NOTE**

Ref: 1297



Grass Roots Ecology Ltd, The Old Vicarage  
Welland Court Lane, Upton-upon-Severn  
Worcestershire WR8 0ST

13<sup>th</sup> May 2021

[REDACTED]  
Grass Roots Planning Ltd  
Suites 9 & 10  
Bristol North Baths  
Gloucester Road  
Bristol  
BS7 8BN

[REDACTED]  
[www.grassrootsecology.co.uk](http://www.grassrootsecology.co.uk)

Forwarded by email only [REDACTED]

## INFORMATION TO INFORM PRE-APPLICATION SUBMISSION | LAND OFF TAIT'S HILL, CAM, STROUD

Dear [REDACTED]

I write in relation to forthcoming residential proposals to provide information on ecological matters and inform the pre-application submission.

### Survey methodology

A phase 1 habitat survey adopting the methodology set out by the Joint Nature Conservation Committee (JNCC)<sup>1</sup>, as recommended by Natural England, was performed in June 2020 with further checks undertaken as part of subsequent visits for reptiles and bats (see below). Particular attention was given during the survey visits for the presence of protected, notable or priority species.

The visits were performed by myself and with over 12 years' experience as a practising ecological consultant and nearly 20 years' experience within the environmental assessment and development planning sectors, this is considered to meet the requirements of a 'suitably qualified ecologist'. I also hold both Bachelor of Science and Master of Science degrees in ecology related subjects, am a full member of CIEEM and possess relevant survey licenses with Natural England.

Information on protected/notable species and ecologically designated sites has been sought from Gloucestershire Centre for Environmental Records (GCER) and regard has also been had to the online National Biodiversity Network (NBN) Atlas<sup>2</sup> and Multi-Agency Geographic Information for the Countryside (MAGIC)<sup>3</sup> databases. This data, together with findings of the phase 1 habitat survey visits and additional species-specific surveys will inform an ecological impact assessment which will accompany the forthcoming planning application.

<sup>1</sup> Joint Nature Conservation Committee (JNCC) (2010) *Handbook for phase 1 habitat survey – a technique for environmental audit*.

<sup>2</sup> <https://nbn.org.uk>

<sup>3</sup> <http://magic.defra.gov.uk>





Following the above survey work and desk assessment, an ecological constraints and opportunities plan was produced to inform the forthcoming design and this has been appended to this note.

### Habitats

The majority of the site comprises grazed/cut semi-improved grassland which is divided over three fields, as labelled F1-F3 on the enclosed plan. This habitat is not considered to be of any particular value in botanical terms being common in the local area. However, an area within the northern part of field F3 (see dashed zone) does offer relatively higher botanical interest within the context of the site with species present including Meadow Vetching *Lathyrus pratensis* and Common Knapweed *Centaurea nigra*. Some areas of marshy grassland (hatched) supporting Marsh Thistle *Cirsium palustre* are also present.

Boundaries of the site are also characterised by hedgerows, trees and occasional scrub. The hedgerows are not species-rich or considered to be classified as being ecologically important under the Hedgerow Regulations. There is also a small stream which forms the northeast boundary of the site along with associated (overhanging) trees.

### Bats

Given the full legal protection<sup>4</sup> afforded to all UK bat species under schedule 5 of The Wildlife and Countryside Act 1981 (as amended) and schedule 2 of The Conservation of Habitats and Species Regulations 2017 (as amended), any trees to be affected by the forthcoming proposals were assessed for their potential to support roosting bats.

To establish the value of the site for local bat populations, a series of activity surveys were performed from July to September with survey effort further supplemented through deployment of bat recording detectors across the site.

None of the trees presented obvious features for roosting bats, however, screening from adjacent vegetation and the presence of Ivy *Hedera helix* may conceal such features on some of the trees. In any event, the majority of the trees would be retained, as shown on the submitted framework plan.

The activity surveys confirmed common bat species as well as species less tolerant to artificial lighting (e.g. *Myotis* species) with these tending to be more frequent along the northeast boundary of the site and along the dividing hedgerow. The results confirm that the site is of some value to local bat populations for foraging purposes although no obvious evidence to suggest that it supports any important commuting routes was recorded/observed.

A substantial area of informal open space is proposed in the east of the site and this will support a mosaic of new habitats which are of value to the local bat population. To safeguard the species which are less tolerant to artificial lighting, a sensitive lighting scheme will be designed in accordance with Bat Conservation Trust's Guidance Note 08/18 (Bats and artificial lighting in the UK).

To provide enhanced roosting opportunities new dwellings will incorporate roosting features (e.g. inset bat bricks/roosting boxes) and bat boxes would also be erected on suitable retained trees.

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<sup>4</sup> where both the species and its habitat (roosting sites) are protected.

## Great Crested Newts

It is widely appreciated that without barriers to dispersal Great Crested Newts can traverse distances of up to 500m from their respective breeding ponds and suitable terrestrial habitat within this distance *could* be utilised, but suitable habitat at much closer distance will be more commonly used. Historically, when Great Crested Newt mitigation schemes were in their infancy, this distance from a development site was taken as the maximum distance at which Great Crested Newts could be relevant to a development scheme. However, more recent guidance has demonstrated that this zone of influence is in reality typically much smaller. For example, a research report<sup>5</sup> undertaken by English Nature (now Natural England) in 2004 concluded that *"... the most comprehensive mitigation, in relation to avoiding disturbance, killing or injury is appropriate within 50m of a breeding pond. It will also always be necessary to actively capture newts 50-100m away. However, at distances greater than 100m, there should be careful consideration as to whether attempts to capture newts are necessary or the most effective option to avoid incidental mortality. At distances greater than 200-250m, capture operations will hardly ever be appropriate."*

Moreover, studies by Jehle<sup>6</sup> and Cresswell & Whitworth<sup>7</sup> have also demonstrated that the habitat within 50m of the pond is the most important to Great Crested Newts and supports the majority of the population within its terrestrial phase. Newts generally only disperse beyond this area where there are suitable habitat features linking the breeding pond to the terrestrial habitat.

No ponds are known within 500m of the site following inspection of online OS mapping. However, GCER returned a historic record (from 1999) for this protected species to the west of Tait's Hill and this would appear (following inspection of aerial photography) to correlate with a pond within the curtilage of a residential property off Clingre Down located approximately 150m from the site. Given the presence of intervening residential development and the busy B4066 (Tait's Hill) which would inhibit amphibian dispersal, it is considered that the likelihood of Great Crested Newts utilising terrestrial habitat within the site at this distance from the pond is low. Indeed, no Great Crested Newts were found beneath the refugia that were deployed as part of the reptile survey. Accordingly, no further survey work is considered to be required to support the forthcoming planning application and we would welcome the ecology officer's confirmation on this.

## Badgers

Given the legal protection afforded to Badger under the Protection of Badgers Act 1992, particular attention was given to any evidence indicating activity, such as the presence of a sett, well-worn paths/push-throughs, footprints, latrines and foraging signs. Where possible, this search extended to 30m from the site boundary. It should be noted that it is not always possible to identify signs of Badger where there are areas of dense vegetation as this can conceal features such as setts.

An Badger sett is located within the dividing hedgerow, as shown on the attached plan. This will continue to be monitored to determine its status. To facilitate a cohesive layout and avoid the risk of any interference impacts from residential curtilage, the emerging proposals will provide a replacement artificial sett within the informal open space in the east of the site. The artificial sett would be designed to a specification to satisfy the requirements of Natural England under a development licence and it is likely that it would be provided at least six months ahead of sett closure.

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<sup>5</sup> English Nature (2004) *Research Report Number 576: An assessment of the efficiency of capture techniques and the value of different habitats for great crested newt Triturus cristatus*, English Nature Research Reports

<sup>6</sup> Jehle R (2000) The terrestrial summer habitat of radio-tracked great crested newts (*Triturus cristatus*) and marbled newts (*T. marmoratus*). *Herpetological Journal* 10: 137-142

<sup>7</sup> Cresswell W and Whitworth R (2004) *An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt Triturus cristatus*. English Nature Research Report 576. English Nature, Peterborough.

## Reptiles

Some areas of the site, particularly field F3, supported some areas of rank vegetation. As such, artificial refugia were distributed within suitable habitat in July 2020 with seven check surveys performed during suitable weather conditions between August and October.

The surveys confirmed a small population of Slow-worm adjacent to the dividing hedgerow within field F3. Habitat retention in the east of the site would retain sufficient habitat and this would be managed to provide areas of rank grassland.

## Other protected/notable species

Following the habitat survey and desk assessment there are considered to be no other protected/notable species considerations relating to the site.

## Designated sites

The nearest statutory designated site is Stinchcombe Hill Site of Special Scientific Interest (SSSI) which is located approximately 1km to the southeast of the site. Stinchcombe Hill SSSI is designated in part for its unimproved calcareous grassland and associated flora and fauna.

At further distance is the Severn Estuary Ramsar, Special Protection Area (SPA) and Special Area for Conservation (SAC) located 7km to the west of the site. It is recognised for its estuarine habitats which support internationally important birds and migratory fish. The Severn Estuary is located within Stroud District Council's 7.7km Severn Estuary Core Catchment zone where new net housing could contribute to recreational pressure and disturb the wintering bird interest. It is considered that the proposals would reduce the extent of future occupiers travelling to the Severn Estuary given the significant area of open space being proposed. However, we welcome the ecology officer's view in terms of whether any financial contributions are required in line with Stroud District Council's mitigation/avoidance strategy relating to the Severn Estuary<sup>8</sup>.

The nearest non-statutory designated site is Sheep Path, Westfield & Bownace Woods Local Wildlife Site (LWS) located approximately 700m to the southeast which is recognised for its ancient semi-natural broad-leaved woodland habitat.

The other designated sites are judged to be outside of the zone of influence on the basis that there is no direct connectivity and their separation from the site, all of which present significant barriers to both wildlife dispersal and any interference impacts which may arise from the proposals.

## Habitat retention/creation

Field F3 has been retained on the submitted framework plan to retain the botanical interest of the site. It is recommended that the majority of this area is managed to maintain and enhance its botanical value through appropriate management and overseeding with calcareous species where necessary.

The hedgerow network and trees would also be retained, with only a minor loss proposed to the hedgerow along B4066 (Tait's Hill) to facilitate access.

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<sup>8</sup> Stroud District Council, *Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site*, December 2017.

To maximise gains for biodiversity the following enhancements are recommended for further detailed design:

- other open space areas would be seeded using a species-rich grassland mixture which is tolerant of more regular cutting;
- new drainage features would be designed with wildlife in mind through creation of new habitats with consideration given to promoting permanently wet features;
- new hedgerow planting is recommended along the southeast boundary of the western field to reinforce the connections with the retained and wider hedgerow network (see attached plan); and
- wider landscape planting should prescribe native species of local provenance and of known value for wildlife. This should include a range of species to provide berry and fruits and those that provide a diverse structure and form.

Given that any forthcoming application will be for outline planning permission only, we suggest that the specific details of this are secured by a Landscape and Ecological Management Plan (LEMP).

### Biodiversity net gain

DEFRA's biodiversity net gain metric (version 2) has been completed and an excel version is submitted alongside this pre-application submission. This shows that the proposals can achieve a 10% biodiversity net gain in habitat terms and at least a 20% increase in hedgerow terms based on the following assumptions:

- at least 10% of the developable area can accommodate open space which can be seeded with a species-rich grassland mix tolerant of more regular cutting (grassland – other neutral grassland has been specified in the metric);
- 30% of the developable area would represent gardens (urban – vegetated garden used in the metric);
- Urban – artificial lake or pond has been used in the metric to represent the drainage attenuation feature; and
- Field F3 would be retained and enhanced through an uplift from a distinctiveness of 2 (modified grassland) to 4 (other neutral grassland) and this is considered to be achievable through a combination of dedicated management and overseeding where required.

These draft calculators therefore demonstrate that the proposals would deliver a measurable net gain in biodiversity terms with capacity to achieve the forthcoming target of 10% once the Government's Environment Bill is formally adopted in due course.

### Considerations during construction works

To safeguard the stream along the northeast boundary of the site and prevent any general adverse impacts which could arise during construction activities it is recommended that necessary precautions are adopted in order to suppress dust, protect retained habitats (i.e. trees, hedgerows, grassland) and control run-off, such as:

- Best practice control measures to limit dust generation;
- Appropriate protective fencing as required under BS42020: 2013 (Biodiversity: Code of Practice for Planning and Development) and BS 5837: 2012 (Trees in Relation to Design, Demolition and Construction – Recommendations); and
- Best practice measures to control runoff and prevent pollution incidents.

Such measures can be incorporated into a Construction Environmental Management Plan (CEMP) which can be secured through planning condition.

Further precautions would be adopted in relation to the presence of Badgers, reptiles and nesting birds.

I trust the above provides sufficient information to allow Stroud District Council to issue their formal pre-application advice, however, if you require any further information then please don't hesitate to contact me.

Yours sincerely,

A black rectangular redaction box covering the signature area.



Director





phase 1 habitat survey: 07-Jul-2020  
7x reptile surveys: Aug-Oct 2020  
3x bat activity surveys: Jul-Sept 2020

KEY:

-  SITE BOUNDARY
-  SEMI-IMPROVED GRASSLAND
-  HEDGEROWS
-  TREES AND SCRUB

CLIENT: -  
REF: 1297  
REV: B  
DATE: 11.05.2021  
SCALE: nts



**APPENDIX F**  
**DRAINAGE NOTE**

# Taits Hill Road, Cam

## Flood Risk and Surface Water Drainage – Pre-Application Note

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205462

### Introduction

1. This note presents a high-level summary of flood risk and surface water drainage at the site, which has been prepared to support the pre-app submission.

### Flood Risk

2. According to the Environment Agency Flood Map for Planning, the site is entirely located within Flood Zone 1, indicating a low level of flood risk from fluvial and tidal sources.
3. The site is approximately 5.5 hectares (ha) in size and in accordance with the National Planning Policy Framework (NPPF) a Flood Risk Assessment (FRA) is required to support the planning application.
4. In terms of the guidance in the NPPF on flood risk and development, residential proposals are considered appropriate in areas located in Flood Zone 1.
5. The Risk of Flooding from Surface Water map indicates that almost the entire site is unaffected by surface water flooding, which is defined as a very low flood risk. Some surface water flooding is identified along the site's eastern boundary, which is associated with an unnamed watercourse. However, this is contained to the riparian area and will not represent a development constraint.
6. No other sources of flood risk are believed to impact the site and flooding is not a development constraint.

### Surface Water Drainage

7. It is well understood that one of the effects of development is typically to reduce the permeability of the site and consequently to change its response to rainfall. Therefore, a suitable surface water drainage strategy is required to ensure that the surface water runoff regime is managed appropriately so that there would be no increase flood risk to third parties.
8. The proposed surface water management strategy will be derived based upon the principles of Sustainable Drainage Systems (SuDS).
9. A site investigation has been undertaken which confirms that the part of the site proposed for development is underlain by Marlstone Rock Formation. It also confirmed that infiltration as a means of surface water management is appropriate in this part of the site.

10. Given that infiltration of surface water runoff into the ground is at the top of the sustainable drainage hierarchy, private soakaway will be used within gardens. Highway runoff can also be drained to soakaways.
11. There is a steep slope between the developed area and the watercourse on the east site boundary. It is possible that some infiltrated water could re-emerge down slope of the developed area before draining into the watercourse. However, this area is within the wider site ownership and will be retained as open space. Furthermore, soakaways are proposed to spread out the distribution of infiltration across the site and mimic natural conditions.
12. The watercourse can offer an alternative means of surface water disposal if required. For example, if more thorough site investigation were to reveal isolated parts of the developed area that were unable to be managed by infiltration, these could drain to the attenuation basin. Therefore, the Concept Masterplan presents an attenuation basin, should this be needed.

**APPENDIX G**  
**PREVIOUS ADDITIONAL HOUSING OPTIONS CONSULTATION REPRESENTATIONS**

**ON BEHALF OF CLIFTON HOMES (SW) LTD**

**REPRESENTATIONS TO STROUD DISTRICT**

**COUNCIL'S LOCAL PLAN REVIEW**

**'ADDITIONAL HOUSING OPTIONS'**

**CONSULTATION**

**IN RESPECT TO LAND EAST OF TAIT'S HILL**

**ROAD, CAM**

**December 2020**

**ON BEHALF OF CLIFTON HOMES (SW) LTD**

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

**IN RESPECT TO LAND EAST OF TAIT'S HILL ROAD, CAM**

Grass Roots Planning  
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Ref: 508/A3/MK/CC  
Date: 10<sup>th</sup> December 2020

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## 1.0 INTRODUCTION

1.1 On behalf of Clifton Homes (SW) Ltd and the landowners, Grass Roots Planning have been instructed to prepare and submit representations to Stroud District Council's (SDC) Local Plan Review 'Additional Housing Options' (AHO) consultation, currently taking place until the 16<sup>th</sup> December 2020. This is with particular reference to land east of Taits Hill Road, Cam, which is being promoted by Clifton Homes.

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

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

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

1.4 Whilst we are pleased to see that Cam and Dursley have been selected as an option for growth due to its sustainable location, we consider that the strategy is too heavily focused on the north-east and north-west of the town (which also includes Wisloe), with all allocated sites being of a strategic scale. Growth would be better distributed to other parts of the town and land adjacent to it to avoid over-concentrating development in one specific location where extensive infrastructure provision will be required to make it acceptable and potentially



saturation of the market. It is also considered that a broader portfolio of sites of varying sizes is required, to ensure there is flexibility built into the plan.

1.5 Land east of Tait's Hill Road, Cam (the site) is an appropriate site for development as we will go on to illustrate. It could provide an immediate development option thereby diversifying the available supply in this part of the district when compared to the more flawed strategic options we will discuss in this document. The site is capable of accommodating circa 50-60 homes and extensive public open space. This is not an option currently being considered by SDC but we consider that it could better diversify the supply at Cam and provide an alternative source of supply to compensate for the removal of existing proposed allocations that are unsound. It would also help to provide a broader portfolio of sites to allow a more consistent trajectory of development across the plan period, which will allow much needed flexibility and also boost housing numbers if they need to be increased across the District.

1.6 The land at Tait's Hill and the proposals for it are set out in a series of technical assessments that have been undertaken in support of the development and these should be read in conjunction with this statement:

- Appendix A – Site Location Plan
- Appendix B – Concept Plan / Constraints and Opportunities Plan
- Appendix C – Framework Masterplan
- Appendix D – Ecology Update Note
- Appendix E – Transport Technical Note
- Appendix F – Drainage Technical Note
- Appendix G – Tyler Grange Landscape Advice Note

1.7 In summary we have a range of concerns regarding the currently proposed spatial strategy and believe it to be unsound for the reasons we will describe, which includes how SDC intend to allocate the additional sites that are required to address increased housing numbers that have been identified as being needed as part of MHCLG 'Standard Method' for determining housing need. We have responded to the questions raised as part of this consultation directly within this document but the representations need to be read as a whole.

1.8 Primarily we consider that the strategy relies too heavily on strategic-scale sites, and some of the strategic sites selected are not underpinned by robust evidence to show they are deliverable, particularly in terms of viability. There is also a serious lack of credible evidence to underpin the Council's views that the selected large strategic sites are suitable and sustainable locations for development.

- 1.9 To address these concerns we consider that the flawed strategic allocations (such as Sharpness and Wisloe) need to be removed from the plan to reduce the currently acute overreliance on larger sites and a wider range of smaller sites provided in sustainable locations that adhere to the spatial strategy (i.e. new standalone sites on the edges of settlements such as Cam/Dursley. These new non-strategic sites should seek to provide a more diverse portfolio of land of varying sizes to deliver homes and other development over the next five years and beyond; this should include the allocation of land at Tait's Hill Road which will diversify the portfolio of sites available in the town and hence potential production outlets, in a sustainable location that meets favourably with the established settlement hierarchy for SDC. We consider that this more diverse portfolio solution represents the most sustainable and credible option for meeting the increased housing need set out by MHCLG.
- 1.10 Land east of Tait's Hill Road, Cam offers a highly sustainable location for new development which meets the needs of the settlement; given its scale and the site's limited constraints it is envisaged that development could be delivered within the first five years of the plan period, subject to planning permission being forthcoming.

## 2.0 THE HOUSING REQUIREMENT AND EXISTING SUPPLY

### **Housing Requirement**

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

### **Existing Supply**

#### *Windfalls*

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

#### *Reserve Supply*

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

### 3.0 THE CURRENT SPATIAL STRATEGY

3.1 The Local Plan Review 2019 focuses growth on Cam and Dursley, Stonehouse, the southern Gloucester fringe and Stroud, followed by two new settlements at Sharpness and Wisloe. Employment growth has been focused on accessible locations within the A38 / M5 corridor.

3.2 Settlements have been divided into tiers, with Cam described as a Tier 1 settlement.

3.3 An extract of the proposed allocations in the Local Plan Review document (2019) is shown below:

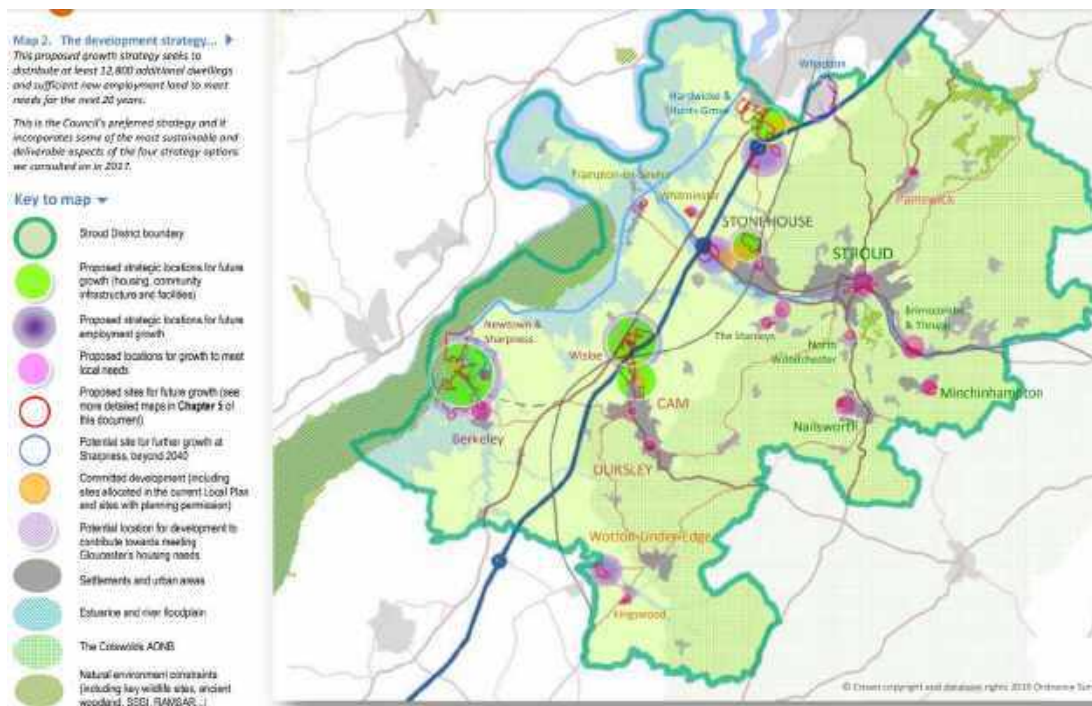


Figure 1. Proposed Development Strategy for Stroud

3.4 As the map shows, significant growth has been planned in Cam to the north-east and north-west of the town, with no development to the west or south. Neither is any significant growth proposed at Dursley which adjoins Cam.

#### Strategic Sites

3.5 We have considered the type and mix of supply anticipated to come forward over the next twenty years in Stroud. Housing need and anticipated supply was set out in the Draft Local Plan 2019 as follows:

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

Figure 2. Extract of Draft Local Plan 2019

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

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

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

3.7 By removing extant permissions (some of which will be coming forward on strategic-scale allocations in any event), strategic sites make up 7,680 dwellings of the total new supply set out in the 2019 draft plan. This equates to 50% of the total number of dwellings anticipated to come forward (15,298 homes once taking into account commitments) and 76% of the



allocations and windfalls proposed (10,075), which is an extremely high proportion of overall growth and in our view represents a significant over-reliance on such sites.

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

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

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

3.9 If the AHO proposed sites at Whitminster and Moreton Valence are also allocated without any of the other unsuitable allocations removed, such as Wisloe and Sharpness (which we will go onto discuss), the overall proportion of strategic sites goes up even further:

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

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

- 3.10 The inclusion of these sites on top of the existing strategic-scale allocations would result in 62% of overall supply being from this type of site and 82% of the new allocations and windfalls proposed (11,430 homes would be allocated on strategic sites out of 13,825). This makes the overall reliance on such sites rise to a level which does not even come close to other districts in the area and represents an extreme risk to housing delivery SDC.
- 3.11 SDC are therefore relying far too heavily on strategic sites to come forward in a timely fashion to deliver the housing required to meet objectively assessed need and 5YHLS targets. Evidence to date has demonstrated that this is difficult to achieve. The second edition of Lichfield's paper 'Start to Finish' published in February 2020 identifies that sites of over 500 dwellings are anticipated to take 5 – 8.4 years from the outline application being validated to the first home to be delivered. Given the lack of progress on detailed proposals for these sites, with no outline planning applications submitted as yet (with the exception of an application at Sharpness Docks), it's clear from the Lichfields evidence that the overreliance on strategic sites will push the vast majority of housing delivery into the later part of the plan which will lead to an acute undersupply in its first ten years and then a glut of supply after that point, if the sites selected do actually prove viable.
- 3.12 With consideration of the table above, the number of strategic allocations proposed in Stroud is significantly higher than nearby authorities. South Gloucestershire Council and the Tewkesbury, Cheltenham & Gloucester authorities, whose strategic allocations make up 36% of their overall supply, far lower than Stroud's, have repeatedly been found unable to demonstrate a five year housing land supply despite having an up-to-date plan. We therefore have concerns over the ability for these sites to deliver identified housing requirements in a logical and sustained way. This is because there are fewer smaller allocations available, which can come forward more quickly and 'plug' the gap before large strategic sites come on stream and deliver.
- 3.13 We also have significant concerns about some of the strategic scale sites proposed in the Draft Plan and the AHO, which we go on to describe in the next section. These mainly relate to the limited evidence provided to underpin their suitability, viability and/or deliverability.
- 3.14 The evidence based which underpins the Local Plan has also raised the reliability of strategic-scale sites as a concern. The 'Assessment of Strategic Development Opportunities in Parts of Gloucestershire' undertaken by HDH Planning & Development which considers strategic development options in Stroud (Appendix 6 of this report (December 2019)) states at paragraph 10.52 that *"if the Councils proceed with the inclusion of the large greenfield sites in the future Plans, we suggest a cautious approach as it is not possible to capture the detail*

*of viability (particularly in relation to the infrastructure requirements) of large strategic sites in a high level study of this type. It would therefore be prudent of the Councils to engage with the developers and landowners before relying on these types of site in the future”.*

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

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

3.16 Another new growth point, as indicated under Option C, is only viable if some existing strategic allocations, such as Sharpness and Wisloe (which are not sustainable and credible options), are removed and replaced with a single, more suitable option, such as a strategic allocation at Whitminster – please see our separate representations in relation to this matter. The housing that would be lost by removing these two strategic scale, but inappropriate allocations, should, then be re-distributed as smaller-scale allocations such as to the west and south of Cam, to provide a greater variety of sites that can come forward more quickly and thereby reduce the over reliance on strategic sites.

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

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

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

- Some of the strategic sites selected need to be reconsidered and removed from the strategy, our view is this should include Wisloe and Sharpness because the evidence underpinning them is not robust and the viability and commercial attractiveness of both sites has not been proven;

- We consider the capacity of Moreton Valence is overstated and also provides supply where significant growth, at Hunts Grove, has already occurred; and
- To compensate for the loss in housing numbers resulting from the reconsideration of these three strategic sites we suggest a much broader portfolio of sites be included in the plan including sites that can be delivered without the large scale infrastructure that the current strategic allocations require.

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

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

3.21 When considering the four different spatial options set out in the 'Additional Housing Options' consultation paper for allocating additional housing land therefore, we are of the strong opinion that Option A (intensifying existing allocations) is not credible unless there has been significant technical work and masterplanning undertaken to demonstrate the increase in units is achievable without resulting in adverse effects, as otherwise it will involve placing further pressure on existing allocations, mainly strategic in scale, to deliver the housing needed to ensure the plan is sound.

3.22 This does not achieve the NPPF's guidance which requires a balanced portfolio of sites to be delivered and that the strategy be underpinned by evidence – because the evidence around such a strategy (the Lichfield's 'Start to Finish' paper in particular) suggests it will push housing delivery to the back end of the plan period which is not an effective and justified strategy, and is therefore unsound.

3.23 We agree that Cam has a number of everyday facilities and services which make it a sustainable location for growth. However, it is our view that this is too heavily focused on land to the north-west and north-east of the town, with credible and sustainable options ignored to the west, south and east.

## 4.0 COMMENTS ON SPECIFIC ALLOCATIONS

### **Cam / Wisloe**

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

### *Deliverability*

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



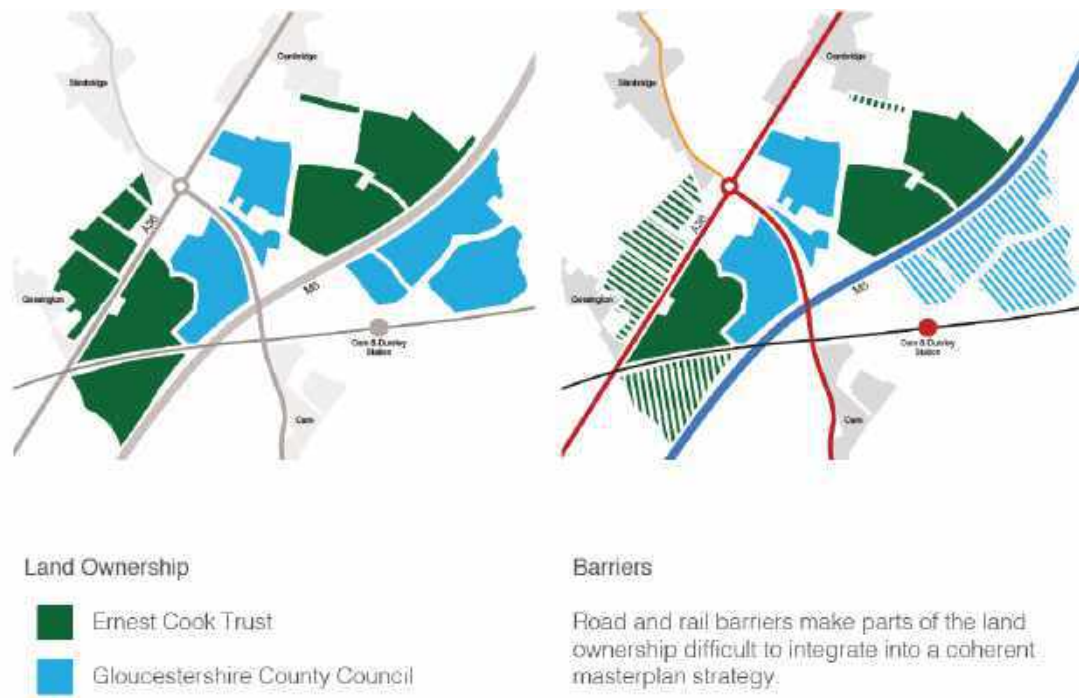


Figure 4. Extract of Wisloe Garden Village promotion material which shows the different land ownerships

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

#### *Land Uses Proposed*

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

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

- 4.12 Taking an average of the Employment Densities Guide 2010 full-time employee per m<sup>2</sup> for these uses, this equates to 990 jobs. The allocation at Wisloe incorporates 5ha of land – taking the same assumptions, this will equate to circa 430 jobs. The other allocations at Cam do not include any employment land provision.
- 4.13 On a very basic level therefore, the proposals at Cam when completed could provide a total of 8,000 economically active residents in an area with only 3,400 jobs available, worsening the ratio of jobs to workers to 0.42 : 1, further exacerbating the issue of out-commuting, an outcome which national planning policy seeks to avoid. It should also be noted that the Scoping Report issued for the north-western allocation at Cam states that they intend to deliver 1,100 dwellings at this allocation, rather than 880, which means this issue could be even further exacerbated.
- 4.14 The plan needs to be more ambitious in its ability to address this issue if SDC are serious about addressing the Climate Change Emergency; in our view the current strategy for the Cam area is an unsustainable approach and will exacerbate existing problems associated with out-commuting. This does not appear to have been considered in any of the representations or work undertaken to date by SDC and has not been considered from a masterplanning perspective in terms of land-take by the promoters. We consider that once this is taken into consideration these allocations will need to include larger levels of employment land which in turn will reduce housing yields. Smaller allocations will be required in other locations to compensate for this loss, such as land east of Taits Hill Road.
- 4.15 We also have concerns relating to the technical work underpinning the allocation at Wisloe and the constraints associated with the land, including highways, landscape, agricultural land, noise, and utilities.

#### *Highways Impact*

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

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

- 4.18 Whilst some mitigation options have been considered the proposed improvements are yet to be agreed with Highways England and this could present a significant constraint to development in this location.

#### *Landscape / Coalescence*

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

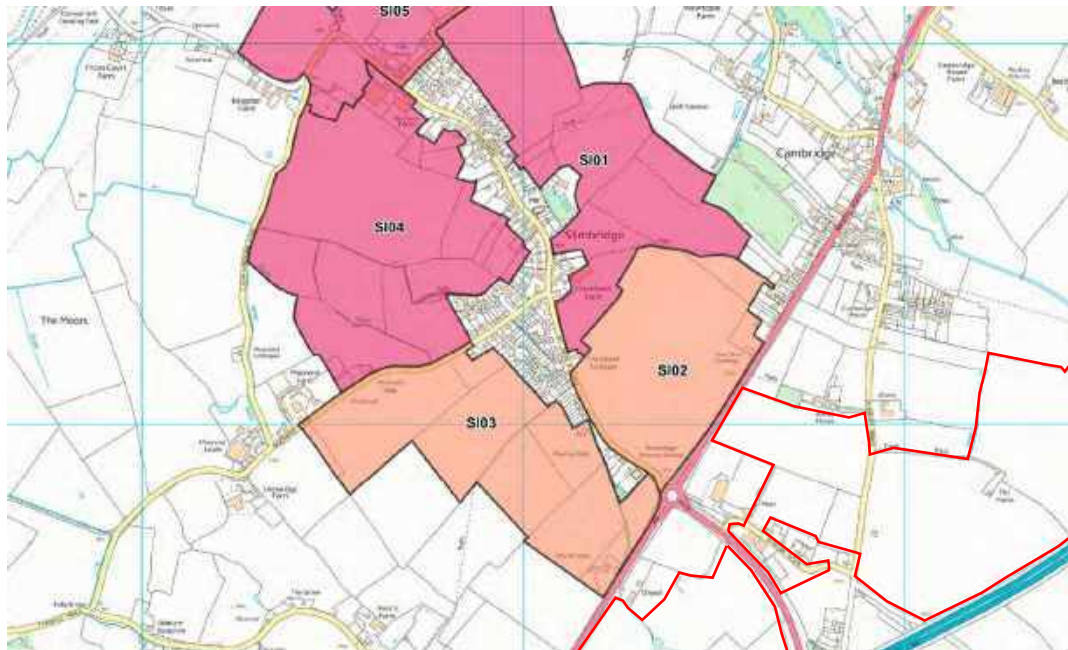


Figure 5. Extract of SDC's Landscape Sensitivity Assessment 2016 (part of Wisloe allocation shown in red) – no updates appear to have been undertaken in support of the Local Plan Review



- 4.20 Before any decision on such a large-scale allocation is made a full and objective assessment of the landscape sensitivity of the site needs to be undertaken by SDC which would inform the masterplan of any constraints. Without this information, it is unclear how credible it is to say that the 1,500 dwellings will be delivered without significant adverse landscape impacts.
- 4.21 Further to this, the proposed allocation at Wisloe sits between existing settlements, including Slimbridge, Cambridge, and Cam / Dursley. No assessment of the issue of coalescence, or perceived coalescence, appears to have been undertaken. Again, there could be significant negative impacts which are yet untested in regard to this issue.

#### *Agricultural Land Quality*

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



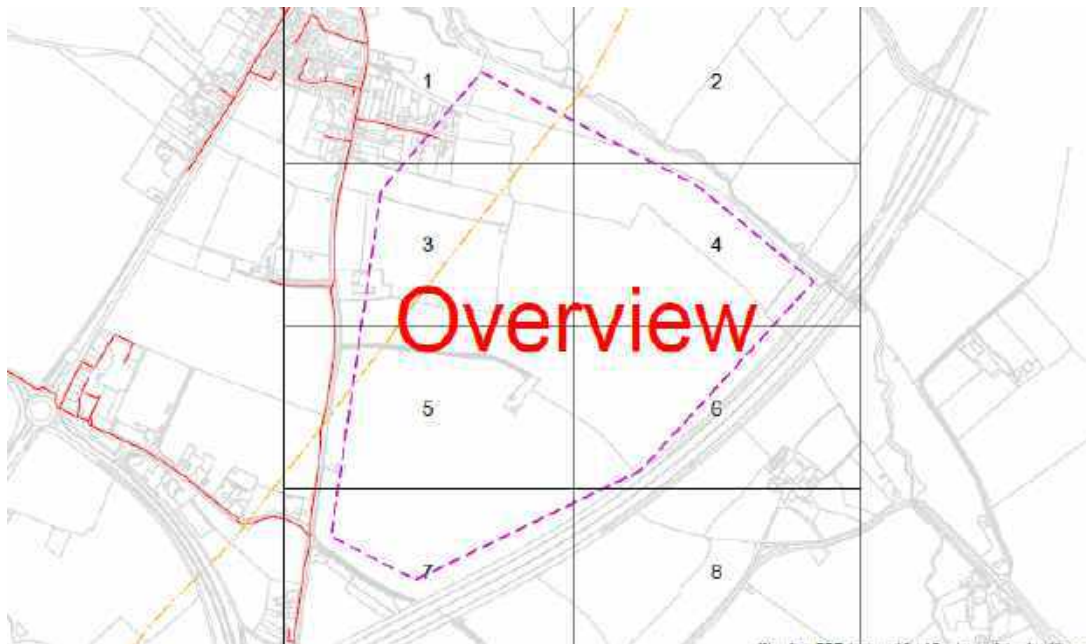
*Figure 6. Extract of Agricultural Land Quality Maps which show the majority of the Wisloe allocation is Grade 2 (light blue) with a small proportion Grade 3 (approximate site area shown in red)*

### *Noise*

- 4.23 We have been unable to find any technical assessment of noise issues at the site despite there being reference to such an assessment being made in the Peter Brett Associates (now Stantec) representations. Whilst we don't believe that this will create an undeliverable scheme it does present a constraint to the development and it is highly likely that a substantial buffer, bund and / or barrier will need to be created adjacent to the M5 to ensure there will be no adverse impact in terms of amenity on future local residents. This in turn will have a knock-on effect on the masterplan for the site and we question whether 1,500 is actually achievable once this constraint is taken into account.

### *Utilities*

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



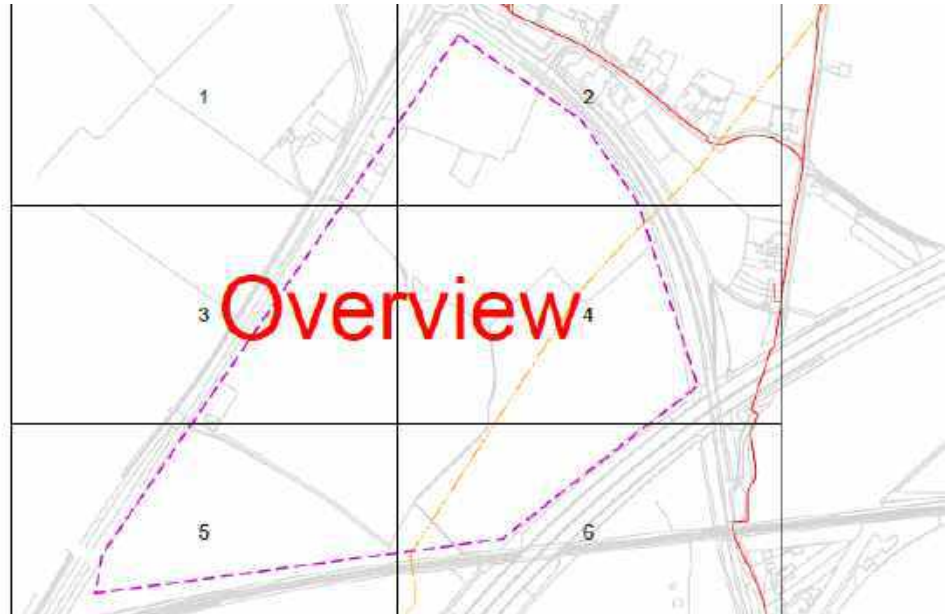


Figure 7. Route of High Pressure Gas Pipe owned by WWU crossing the allocation at Wisloe (shown with orange broken line)

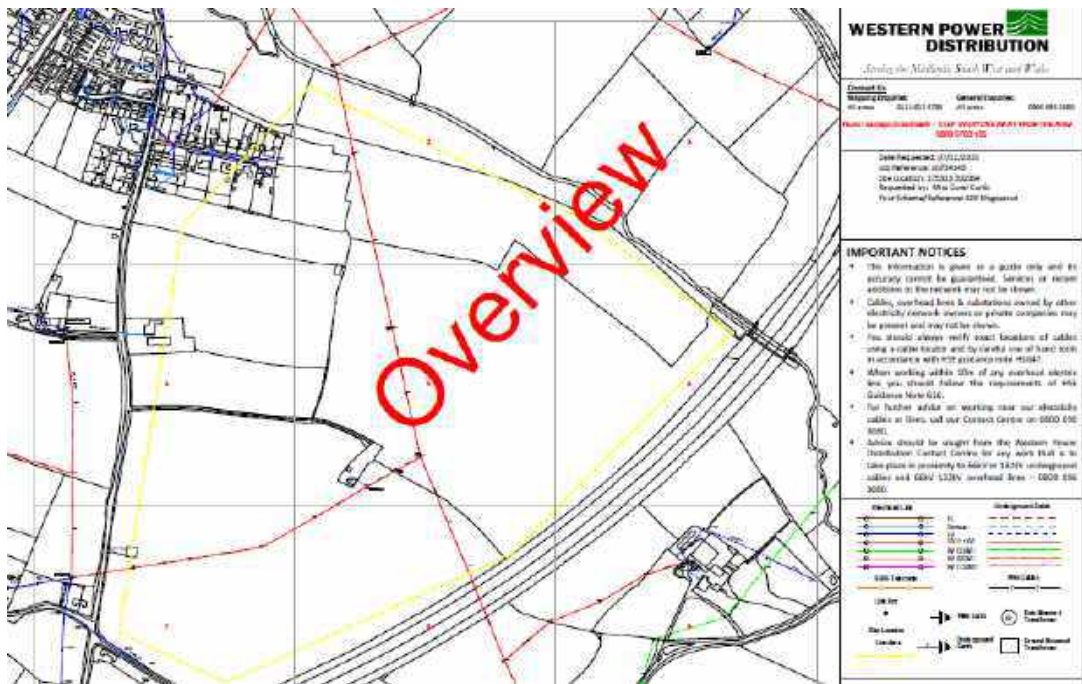


Figure 8. Extract of WPD showing overhead lines / underground cables owned by WPD (red line)

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

*Conclusion on the allocation at Wisloe*

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

**Sharpness**

- 4.27 Land at Sharpness is separated into two allocations – Sharpness Docks for 200 dwellings and Sharpness for 2,400 homes. As set out within the introduction we have concerns over the lack of technical evidence to date and the commercial viability of this allocation.

*Sustainable Transport Links*

- 4.28 Our primary concern relating to this allocation is the unsustainable location of the site, as highlighted in the evidence presented by Stagecoach buses as part of the Regulation 18 consultation to the Local Plan.
- 4.29 In particular we have picked up on the comments by them which state the following:

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

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

*"Given the way that the railway has been a key articulating and structuring principle behind some major aspects of the Local Plan strategy, not least the new town at Sharpness Vale, justified until very recently by the claims that it could be sustainably be facilitated by the re-*



*opening of the Sharpness Branch, this ought to give both the Councils pause for some very serious thought indeed”.*

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

- 4.30 The evidence presented by one of the key bus operators in the District is particularly damning and we have serious concerns over the credibility of Sharpness as an allocation if there is no bus operator willing to provide services to and from the area. The Sharpness Growth Point Transport Strategy undertaken on behalf of Green Square by Peter Brett Associates (now Stantec) states that *'the provision of a comprehensive bus strategy will be vital to ensure the development at Sharpness encourages residents, employees and visitors to use sustainable development modes... it is likely that at least one new bus service will be required' (our emphasis)*. Without this therefore, it is our view that the proposals are unviable and will not adequately contribute to sustainable transport goals. As Stagecoach highlight, whilst Gloucestershire County Council may provide some services, these are “policy-driven rather than demand-driven service designs” (page 17 of their comments), meaning that they only provide very basic routes for essential needs, i.e. those that cannot drive a car. We therefore fail to see how the allocation of land at Sharpness will encourage sustainable transport provision and respond to the Climate Change Emergency.

#### *Viability*

- 4.31 In light of the above which in our view is significant and damning evidence that there will be no extensive bus provision at the site, we have also examined the general viability of the scheme at Sharpness in terms of other infrastructure provision. This includes the re-opening of the railway line for a regular service to Cam & Dursley and onwards to Gloucester, and localised road improvements.
- 4.32 We have already set out that there is a lack of jobs available at Cam & Dursley compared to economically active persons which will be exacerbated by the allocations proposed; therefore, it seems illogical to re-open the train line and focus on this connection when the key connectivity will need to be to larger settlements, such as Bristol, which is highlighted in the transport strategy report prepared by Stantec.

4.33 The promoters of land at Sharpness only discuss localised road improvements as part of the development proposed, when, due to this lack of connectivity by rail to the settlements residents will actually need to travel to for work, will force them to travel via private car. This will exacerbate existing issues and create a significant strain on Junctions 13 and 14 of the M5, none of which appears to have been considered in the limited technical work undertaken to date.

4.34 There is also limited evidence to demonstrate that the re-opening of the rail line is feasible, in fact we note the following from the Network Rail representations submitted in January 2020 which state:

*'It should be noted that whilst Network Rail is happy to work with the Council and developer to progress this, until the various feasibility studies have taken place, including how this would fit within the timetable, we cannot guarantee this would be plausible. Should the provision of this service and station be feasible, this would be subject to third-party funding.'*

4.35 This is significant and suggests that despite the proposals being a draft allocation since November 2018 there has been no progression on these discussions with Network Rail to provide any confidence that the re-opening of this line is achievable. Their comments also highlight that this will be subject to third party funding; it is not clear whether this will be government funding or developer funded, again which causes significant concerns that the project may not be viable.

4.36 Within the Peter Brett Associates Sharpness Growth Point Transport Strategy prepared in 2017, which includes the vital evidence on the suggested infrastructure requirements for the development, they state that the following would be required:

- Upgrade the existing single-track route, which is considered to be unsuitable for a regular passenger service and would require a full upgrade along the 6km length of track;
- Re-establishing the Berkeley loop, which allows for trains to travel south to Bristol which would require a rail bridge over the A38 or a bridge to carry the A38 over the railway; and
- A minimum of one new station to be located in the centre of the proposed development.

4.37 This is a significant level of infrastructure that will require many millions of pounds in investment and the proposals to date put forward by the promoters have only suggested that

the line will be re-opened to Cam & Dursley. Peter Brett Associates stated that the above were minimum requirements; without the provision of a good quality rail network to Bristol and a commitment that the developers of this site will be able to fund it without causing viability concerns, including the provision of affordable housing, we fail to see how this is a sustainable option for growth.

- 4.38 We therefore consider that land at Sharpness should be removed as an allocation because there is little to no evidence demonstrating that the infrastructure required to make it sustainable will come to fruition and there is no viability evidence put forward by the developers of this site to suggest how the infrastructure will be funded.

### **Moreton Valence**

- 4.39 This site lies within close proximity to the initial plan review strategic allocation of land South of Hardwicke (G1) and the additional expansion to Hunts Grove (PS30). We have not seen any robust evidence to suggest that locating such a large amount of development in the same geographical area is commercially viable and will not lead to these various sites competing with each other to a degree that will slow delivery rates and potentially make the delivery of infrastructure to serve them difficult.
- 4.40 The development proposals for the Land to the South of Hardwicke (G1) are very well advanced and the site is supported by a detailed and fully informed constraints and opportunities plan, as well as illustrative masterplan options to demonstrate how the site could be sustainably developed. In addition, EIA Screening & Scoping has been submitted and a response from SDC has confirmed that an EIA is required. A planning application is currently being prepared; therefore, this site should remain in the plan.
- 4.41 The new proposed allocation at Moreton Valence (PGP2), which would compete with site G1, is not underpinned by any robust evidence – with no technical information available as part of this consultation. This is the opposite to the Whitminster proposals which are accompanied by such information.
- 4.42 Separate to the issue relating to the absence of any underpinning technical work, we have the following concerns about site PGP2:

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



Figure 9. Extent of Surface Water Flooding



Figure 10. Extent of Fluvial Flooding

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



## 5.0 **OUR PREFERRED SPATIAL OPTION – ANSWERS TO SPECIFIC QUESTIONS**

5.1 Taking the findings of the preceding sections of this statement we have set out our responses to the questions presented in the 'Additional Housing Options' consultation paper below.

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

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

#### **Q1a – Option A Intensify**

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

#### **Q1b – Option B Towns and Villages**

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

#### **Q1c – Option C Additional Growth Point**

5.5 We don't disagree with the proposition that a growth point can be delivered at Whitminster but it needs to replace currently unsound options, such as Wisloe and Sharpness. We do not consider that there should be further provision over and above what is already proposed as otherwise the plan will rely too heavily on strategic-scale sites and housing delivery will be heavily skewed to the latter part of the plan period, or not at all.

#### **Q1d – Options D Wider Dispersal**

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

**Q1e – Would you support a hybrid / combination option?**

5.7 Yes

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

5.8 See answers to Question 2.

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

5.9 We consider that a blend of all options is the most appropriate, but in terms of allocating additional sites this should be on the edge of settlements which are sustainable and have access to everyday facilities and services, or have an interlinking role with another settlement nearby that provides supporting facilities and employment. Intensification of existing allocations can reasonably occur where there has been an evidence base and masterplanning undertaken to confirm this.

5.10 Our views are that the strategy should involve the removal of land at Sharpness and Wisloe due to them being unsuitable locations for development which are not underpinned by technical evidence. The housing numbers lost from these unsustainable locations should then be redistributed to a significant number of non-strategic scale site allocations such as land east of Taits Hill Road, Cam, which can be delivered more quickly, ensuring a five-year housing land supply is maintained and addressing the balance in portfolio of sites. This approach is particularly required at Cam where currently there are significant levels of development being planned for to the north-east and north-west.

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

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

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

5.12 We have answered this question underneath at Question 5.

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

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

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

- **A delay in an allocated Local Plan site receiving planning permission?**
- **Failure to deliver housing at the built rates set out in the Local Plan?**
- **Another trigger**

5.14 It is our view that it should be a combination of the options above, plus if a 5YHLS deficit is found to occur. This will allow for a reserve site to quickly come forward to supply any deficiencies in the delivery of homes in the plan.

5.15 For example, if the trajectory assumes that an allocated site will start delivering homes in 2023, in our view if this site hasn't received full planning permission by 2022 a reserve site should be triggered to plug the gap and shore up delivery.

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

5.16 We will go onto discuss the benefits of allocating land east of Tait's Hill Road, Cam, in the next section of this statement. We consider this is an available and suitable location for development that can deliver housing within the next five years.

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

**9b – PGP2 – Broad location at Moreton Valence**

5.17 We do not support this proposed allocation for the reasons described earlier in this document, in summary our concerns are:

- The site is within multiple ownerships and it is our understanding that the site is not associated with a developer, nor has it actively been promoted by a consortium of landowners to the Council in any co-ordinated or meaningful way. Development proposals for the site are therefore not well progressed.
- The site represents a fragmented potential growth point, with intervening land in multiple ownerships severing the proposed site, and is not capable of being connected across all land parcels and therefore does not allow for a comprehensive development to be planned for or delivered.
- The land is subject to both fluvial and surface water flood risk as figures ? and ? below show. NPPF policy (para 155 in particular) requires that such areas should be avoided, and both the surface water and fluvial flow paths sever the site and exacerbate our concerns regarding connectivity and comprehensive development.
- No evidence has been prepared to demonstrate that providing another large source of supply in close proximity to two existing strategic allocations will not flood the market and lead to delay in housing delivery.

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

5.18 We do not consider that further growth points are needed; in fact, the number of strategic sites should be reduced to avoid an overreliance on this source of supply that has acknowledged extensive lead in times and funding challenges.

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

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



## 7.0 **LAND EAST OF TAIT'S HILL ROAD, CAM**

### **Introduction**

7.1 Clifton Homes (SW) Ltd have a commercial agreement in place with the landowners of land east of Taits Hill Road, Cam. The land is identified on the site location plan which is enclosed as Appendix A to this document and amounts to a total of 5.53 hectares (13.68 acres) of land.

7.2 The site has been submitted previously in the Strategic Assessment of Land Availability (SALA) undertaken by SDC in 2019 and we have previously submitted representations in January 2020 to the Draft Local Plan.

7.3 The site comprises two parcels of agricultural land which are irregularly shaped and divided and bound by hedgerows. To the east is the main settlement of Cam.

### **Planning Status**

7.4 The site is not subject to any specific planning constraints, such as a Flood Zone, Conservation Area, National Park, SAC, or SSSI. The boundaries of the AONB lies to the south and west of Taits Hill Road.

### **Planning History**

7.5 There has been no previous planning applications for the site.

### **Access to Transport**

7.6 A technical note has been prepared by Key Transport Consultants who are advising Clifton Homes on highways matters in relation to the site. This supports these representations and can be found in Appendix E.

7.7 On Taits Hill Road are two bus stops with two services – numbers 62 and X1. These carry services into the centre of Cam, Bristol, Berkeley, Newtown, and Dursley. The 62 runs every two hours Mondays to Saturdays (Stagecoach Service), and the X1 is a school service which runs Monday to Friday to Rednock School, Sharpness Primary School, and Square School.

7.8 On Dursley Road (a circa 8 minute walk), there are further services which includes the 65 and X11. The 65 goes to Woodfield / Draycott and runs every two hours.

- 7.9 There are therefore reasonable public transport options available meaning the use of the private car can be reduced in accordance with national planning policy.

### **Access to Facilities**

- 7.10 The site is in close proximity to Dursley Rugby Club, Stinchcombe Cricket Club, Stinchcombe Village Hall, Quarry Chapel URC Church, café & deli store at The Leaf & Ground, the One Stop store on Phillimore Road, and allotments at Woodfield Road. These facilities all lie within circa 1km of the site (approximately a 10 – 12 minute walk), which complies with the Manual for Streets appropriate walking times / distances.

### **Highways**

- 7.11 As set out in the Key Transport technical note which can be found in Appendix E, a site access has been designed which meets the relevant standards in respect to adjacent highway speeds and is a safe and efficient way of accessing the site.
- 7.12 New footpath links are also provided within the site and linking out to adjacent pathways.

### **Ecology**

- 7.13 Ecology surveys of the site are ongoing and initial advice on biodiversity and protected species that was obtained following a site walkover and review of biodiversity records has informed the emerging master plan for the development.
- 7.14 The main recommendations are to retain and enhance the existing hedgerows, adding trees to these features where possible and keeping the steeper valley element of the site free from development to provide an enhanced area of habitat.
- 7.15 Initial discussions regarding creating a minimum 10% biodiversity net gain as part of the development have been held and our master planner and ecologist are confident that with the generous open spaces being proposed as part of the proposals this can easily be achieved.

### **Flood Risk & Drainage**

- 7.16 A separate technical note has been prepared by Vectos in respect to Flood Risk & Drainage; this can be found in Appendix F and should be read in conjunction with this statement. The

site lies within Flood Zone 1 and is therefore at a low risk from flooding; similarly there are no surface water drainage issues in accordance with the Government's Flood Maps for Planning.

- 7.17 Infiltration testing has been undertaken by Terra Firma. This has determined that infiltration is possible across the site and as such the drainage strategy has been based on this solution.
- 7.18 If required this could be supplemented by attenuation which will discharge into the existing stream along the north-east.
- 7.19 We therefore consider that an appropriate drainage strategy can be incorporated as part of the development in accordance with the NPPF.

### **Landscape**

- 7.20 As part of the 'Emerging Strategy' consultation undertaken between November 2018 – January 2019, CBRE Ltd, the landowners' agent, submitted the site for assessment in the Strategic Assessment of Land Availability (SALA).
- 7.21 Stroud District Council have now assessed the site and have rejected it for the following reasons:
- 'The site is not suitable for development because of the likely high landscape impact; housing development would significantly extend the main settlement westwards, but would feel divorced from it due to the steep valley slopes, and would be further detrimental to the function of the area as a green / wildlife corridor. Employment development would appear incongruous and prominent and would be isolated from the main commercial areas. There are therefore potential impacts preventing sustainable development in this location'.*
- 7.22 Accordingly, Tyler Grange were instructed to assess the site in respect of potential landscape impact, and have prepared an initial landscape advice plan in response, which can be found in Appendix G. An extract of this advice is provided below.





- 7.26 The emerging master plan achieves these aims by allowing generous buffers to existing hedgerows that will be strengthened with planting to filter views of the proposed development and also provides a viewing avenue through the site from the road to the north, towards Stinchcombe Hill to the south.
- 7.27 We would anticipate a more sensitive level of development to be delivered here on the flatter circa 2.5 ha of the site (circa 60 dwellings) at a density of around 30 DPH, to allow suitable landscape buffers to be provided.

*Conclusion*

- 7.28 As such, the technical work undertaken to date has not caused any significant concerns or presented any constraints to the development proposed and we do not consider that there would be any adverse impacts of a scheme for circa 60 units, including policy compliant affordable housing, in this location.
- 7.29 Accordingly, we would request that SDC re-consider the site for development in light of the technical advice prepared and consider allocating the site as an Additional Housing Option in the Local Plan Review.

## 8.0 **CONCLUSION**

- 8.1 In summary, we consider that the current Local Plan strategy relies too heavily on strategic-scale sites which have little evidence to underpin them. In particular we have significant concerns over the allocations proposed at Sharpness and Wisloe, and their ability to meet wider sustainability objectives. We also have concerns about the new proposed growth point at Moreton Valence.
- 8.2 It is our view that these sites should be removed to reduce the burden of pressure from the north-east and the north-west of Cam and instead smaller-scale allocations should be considered to the west, south and east, to distribute development more evenly and allow a flexibility in supply to come forward.
- 8.3 We consider that a 'blend' of Options B, C and D is the most appropriate route forward for allocating additional housing sites. Option A is credible only where there has been an extensive level of technical work undertaken and a masterplanning exercise which demonstrates that an uplift in numbers is achievable without there being significant adverse effects of undermining the viability of chosen sites.
- 8.4 With respect to land east of Taits Hill Road, technical work to date has not identified any significant constraints to the site's development, with the proposals underpinned by a landscape-led strategy to ensure there will be no adverse effects of the development.
- 8.5 We therefore conclude that land east of Taits Hill Road, Cam should be allocated for circa 60 dwellings and extensive parkland / recreation space, to achieve a mixed and balanced portfolio of sites in accordance with the NPPF as well as delivering homes in an accessible location adjacent to a major employer of Stroud District and in an area where there are already planned transport improvements.