

**Representations in respect of Draft Local Plan Sustainability Appraisal Report**

**Site G1 - Land South of Hardwicke**

**Name:** [REDACTED]

**Organisation/Company:** RPS Group

**Client Name/Organisation:** Redrow Homes Ltd

General Point of Clarification

The Sustainability Assessment (SA) report at p95 outlines that the proposed use of Land South of Hardwicke (site ref: G1) is to meet Gloucester’s unmet housing needs. This is however not the case as the site has been included within the Draft Local Plan to meet Stroud’s own future housing needs, albeit, the site is also well positioned to meet the needs of Gloucester should this been deemed necessary under the Duty to Co-operate.

SA Scores in relation to SA Objectives

In respect of the SA and associated scores that have been attributed to the to Land South of Hardwicke in relation to each SA objective, we set out below further information/justification where necessary, in relation to each objective where the score should be adjusted on the basis of the information that is available. Accordingly, and in conformity with the SA methodology, we considered that the following SA matrix is applicable in respect of Land South of Hardwick (G1):

**Table 1: SA Matrix for G1: Land South of Hardwicke (dwelling, local centre, community uses, primary school, green infrastructure, open space and strategic landscaping)**

<b>SA Objective and LPA Justification</b>	<b>LPA Score</b>	<b>Revised Score</b>	<b>Justification</b>
<p><b>SA 1- Housing</b></p> <p>This site has been identified as having potential to contribute towards future housing needs.            The Draft Local Plan Site Allocation Policy sets out that the site may have potential to contribute towards future housing needs and so is included within the Draft Local Plan at this stage for the purposes of public consultation. The site is therefore allocated for a strategic mixed use development, including approximately 1200 dwellings.</p>	++	++	Agreed. The site will contribute to future housing needs.

<p><b>SA 2 – Health</b></p> <p>The site is not located within 800m of a GP. The site is located within 800m of a council play area, a green space and a protected outdoor playspace but also contains a green space and a protected outdoor playspace which could be lost to development. The site is not located within 400m of a walking or cycle path. This site now includes open space uses in line with the Draft Local Plan Site Allocation Policy.</p>	<p>++/?</p>	<p>++</p>	<p><b>The site does not include an area of protected outdoor play space</b> as recorded within the LPA SA Report but does <b>include existing public rights of way</b> which cross the site. Apart from the public rights of way the site forms private land which is used for arable farming. Whilst the site encompasses existing areas of open space (e.g Village Green), these areas are substandard and not fit for any meaningful recreational purpose other than walking. The illustrative masterplan for the site is landscape led and provides meaningful areas of open space including <b>enhancing and enlarging existing areas including the Village Green</b>. A significant positive effect should therefore be recorded.</p>
<p><b>SA 3 Social Inclusion</b></p> <p>Residential site options will all have negligible effects on this objective.</p>	<p>0</p>	<p>+</p>	<p>The LPA SA Report outlines that all residential site options would have a negligible effect in respect of social inclusion. We would disagree. The site will accommodate a mix of housing including affordable housing. The site will also accommodate a <b>local centre, community uses, primary school and an enhanced allotment area</b> within a Tier 3a settlement which would therefore benefit from an increased range of facilities. It is therefore considered that the site will have having a positive effect on the existing and expanded community in terms of social inclusion. A positive effect should therefore be recorded.</p>
<p><b>SA 4 Crime</b></p> <p>Residential site options will all have negligible effects on this objective.</p>	<p>0</p>	<p>0</p>	<p>Agreed.</p>
<p><b>SA 5 Vibrant Communities</b></p> <p>This site is on greenfield land. This site now includes community uses in line with the Draft Local Plan Site Allocation Policy.</p>	<p>+</p>	<p>+</p>	<p>Agreed. As SA3 – the site includes community uses.</p>

<p><b>SA 6 Services and Facilities</b></p> <p>This site is at a tier 3a settlement.</p>	+	+	Agreed.
<p><b>SA7 Biodiversity</b></p> <p>The site is not within 1km of an internationally or nationally designated site. The site is within 7.7km of the Severn Estuary SAC/SPA/Ramsar site. It is also within 250m of Gloucester and Sharpness Canal KWS. There are existing GI assets (a green space and a protected outdoor playspace) within the site that could be lost to development.</p> <p>This site now requires the provision of green infrastructure in line with the Draft Local Plan Site Allocation Policy.</p>	+/-?	+	<p><b>The site does not include an area of protected outdoor play space</b> as recorded within the LPA SA Report.</p> <p>The site has been the subject of a Phase 1 Habitat Survey and associated relevant species surveys and the site has been assessed to have a low ecological value overall.</p> <p>The illustrative masterplan for the site is landscape led and incorporates strong GI principles including the provision of open space corridors which will act as green fingers across the site creating strong connectivity between existing hedgerows, trees, areas of open space and the Village Green. The GI principles for the site therefore align with the Draft Local Plan Site Allocation Policy. <b>No existing GI assets will be lost due to the development.</b> The masterplan takes full account of all biodiversity assets on site and will provide a net biodiversity gain. As such, it is considered that a minor positive effect should be recorded.</p>
<p><b>SA8 Landscape/Townscape</b></p> <p>The majority of the site is in an area which was rated in the Landscape Sensitivity Assessment as being of medium/low – medium sensitivity to residential development. It is not within the Cotswolds AONB or within 500m of the AONB.</p> <p>It is now required that development at the site incorporates strategic landscaping in line with the Draft Local Plan Site Allocation Policy. This may potentially limit impacts in terms of the local landscape setting, however, impacts will be dependent upon the specific design which is unknown at this stage.</p>	-?	0	<p>The site is in an area which is well contained and was rated in the Landscape Sensitivity Assessment as being of medium/low – medium sensitivity to residential development as set out in the LPA SA matrix. The site is not within the Cotswolds AONB or within 500m of the AONB. <b>The site incorporates strategic landscaping in line with the Draft Local Plan Site Allocation Policy. This will limit impacts in terms of the local landscape setting.</b> Specifically, the illustrative masterplan for the site is landscape led and incorporates strong GI principles including strategic landscaping along the canal and boundaries of the site whilst also providing open space corridors which act as green fingers ensuring connectivity across the site. Any potential</p>

			impacts on the local landscape setting will therefore be limited. A negligible to minor positive effect should therefore be recorded.
<b>SA 9 Historic Environment</b>  This site scored 3 in the SALA heritage assessment.	--	0	The site does not have significant heritage constraints. <b>The site itself contains no designated heritage assets.</b> The only known non-designated assets are the course of a Roman road, some relict ridge and furrow and, bounding the site, the Gloucester & Sharpness canal. Whilst there are a number of listed buildings in the vicinity of the site, the design of development will ensure that the character and setting of each of the built heritage assets and the Roman road are protected. Any impacts to heritage receptors will be negligible, or at the lower end of 'less than substantial harm'.
<b>SA 10 Air Quality</b>  The majority of the site scored 83 in the Stroud SALA Transport Accessibility Assessment. The site is expected to be delivered to prioritise walking, cycling, and public transport over the use of private car in line with the draft policy. These types of improvements could have benefits in terms of limiting the release of air pollutants as new development is occupied.	+/--	+	<b>The site is not located within an air quality management area</b> and part of the site has already been the subject of an air quality assessment which concluded any effects of the development on air quality would not be significant. The site is located in an accessible sustainable location and the development will provide opportunities for <b>increased connectivity to public transport as well as improved walking and cycling links.</b> These improvements will limit the release of air pollutants for existing and future residents. A minor positive effect should therefore be recorded.
<b>SA 11 Water Quality</b>  The site is not within a Drinking Water Safeguarding Zone or a Source Protection Zone.		0	Agreed. The site is not within a Drinking Water Safeguarding Zone or Source Protection Zone.
<b>SA 12 Flooding</b>  The site is on greenfield land within flood zone 3a or 3b.	--	0	<b>The majority of the site is located within Flood Zone 1, not 3a or 3b</b> as set out in the LPA SA Report. The flood risk from all sources to the site and the surrounding area has been investigated and it has been demonstrated that the areas within and adjacent to the site (mainly associated

			with Shorn Brook) which do lie within flood zone 2, 3a or 3b are not at risk of flooding (please refer to the submitted Constraints and Opportunities Plan which illustrate these areas). In any event, the illustrative masterplan directs all built development away from these areas. A negligible effect should therefore be recorded.
<b>SA 13 Efficient Use of Resources</b> The site is relatively large in size and on greenfield land. The site is within an area of Grade 3 agricultural land.	--	--	Agreed. Although it should also be recognised that the site makes efficient use of a greenfield site for housing in accordance with local housing need. It is noted that all Grade 3 agricultural land is scored 'red'/likely to have a significant effect with the LPA SA report.
<b>SA 14 Climate Change</b> Residential site options will all have negligible effects on this objective.	0	0	Agreed.
<b>SA 15 Waste</b> This site is on greenfield land.	0	0	Agreed.
<b>SA 16 Employment</b> The site is located within 600m of key employment sites (Quedgeley West; Hunts Grove / Quadrant Distribution Centre) but is not at a Tier 1 or 2 settlement.	+	+	Agreed. The site is well located to key employment areas.
<b>SA17 Economic Growth</b> The site is located within 800m of at least one existing primary school but is not within 800m of an existing secondary school. The site would provide a new primary school as part of the mixed use development in line with the Draft Local Plan Site Allocation Policy.	++?	++	Agreed. The site is well located to key employment areas and would provide a new primary school and local centre as part of a residential-led mixed use development.