

Black Box Planning on behalf of Taylor Wimpey

Hearing Statement

Matter 2: Spatial Strategy and Site Selection Methodology

1. This Hearing Statement has been prepared on behalf of Taylor Wimpey (TW) and should be read alongside the Representations submitted in response to the pre-submission (Reg19) version of the Stroud Local Plan (SLP) in May 2021. It seeks to respond to specific questions set out in the Inspector's Matters, Issues and Questions raised in respect of Matter 2, where relevant to concerns held by TW.
2. These representations are submitted with regard to TW's control over land (130 ha) at Whaddon, with neighbouring promoters L&Q controlling land to the north and Newland Homes controlling a small proportion of the site fronting Grange Road. All parties have been working jointly in respect of the emerging strategic allocation at Whaddon to ensure a comprehensive approach is taken to the masterplanning and deliverability of the site and associated infrastructure.

Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence?

4. Is the spatial strategy justified by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?

1. Generally, Taylor Wimpey raise no objection to the spatial strategy with the exception of two matters.
2. The first relates to the treatment of G2 as a 'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for .safeguarded' site having regard to the evidence base and the objective

to promote a sustainable pattern of development. Whaddon has always been promoted as a cross boundary site and it is inherently sustainable given its physical and functional relationship with Gloucester City. The site is recognised as akin to a Tier 1 settlement in sustainability terms by the SA, and its suitability for housing is confirmed by the evidence base. As highlighted by our previous representations, it is readily apparent therefore that Whaddon should be allocated as a sequentially preferable location for promoting sustainable patterns of development. The SLP somewhat dithers with the allocation by appearing to defer the matter to the JCS review by virtue of ‘safeguarding’. The JCS review has no jurisdiction to allocate the site.

3. The starting point for Whaddon in terms of not being considered for Stroud District’s housing need in the spatial strategy is therefore flawed and flies in the face of all relevant evidence. Throughout our previous representations it has been made clear that if the JCS authorities through their response to the Regulation 19 consultation do not confirm that Whaddon should be allocated for the needs of Gloucester City, including to address the existing unmet need arising from the adopted JCS, then the site should be allocated towards meeting Stroud District’s housing requirement. Whilst the SLP appears to adopt a considerate approach to its neighbouring authority under Duty to Cooperate, it is unacceptable to delay the allocation of Whaddon to a further review of the Stroud Local Plan. To do so would have grave consequences for housing delivery and addressing local housing needs by delaying planning permission of Whaddon by circa 8 years (allowing for optimistic review timetables) meaning new homes would not be delivered to 2032. The JCS Inspector’s recommendation towards Whaddon for addressing the unmet needs of the City was clear. The evidence regarding the existing unmet need and future requirement for Gloucester, and the explicit sustainability and suitability of the site for housing development all presents a sufficiently compelling case for the allocation to be confirmed now.
4. Stroud District is predominantly a commuting district (as confirmed by EB71) with Gloucester the dominant destination for commuters, again pointing to Whaddon as the most sustainable location for delivering housing in the District. As such, the apportionment of housing at Whaddon ought to be a purely administrative exercise for the authorities to agree, and the site should be allocated irrespective on any discussions concerning apportionment.
5. Paragraph 35 of NPPF requires local plans to be “*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*” (emphasis added).

6. It follows therefore, that the JCS authorities should be confirming if the Whaddon allocation is required for Gloucester's needs or otherwise without any further delay, or the site should be allocated towards meeting Stroud's needs. Indeed, this was the intention of the Draft Plan for Consultation (2019) where at paragraph 2.13 it stated;

“Current indications are that Whaddon may be amongst the better performing options. If the process ultimately concludes that a site at Whaddon is not required to meet Gloucester's immediate needs, then there is potential to review how the land might contribute to Stroud's own needs and whether there is any merit in bringing it into the Stroud District Local Plan, with consequential changes to the strategy.”

7. The second matter of concern as raised in our Regulation 19 representations so not repeated here, relates to the conformity of allocations at Sharpness and Wisloe Green with the objective to delivering sustainable patterns of development. This falls to be considered under question 14 of the MIQs below.

7. Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?

8. Concerns remain with some of the specific scoring in the SA. In respect of Whaddon, the justification for scoring set out in SA Appendix 5 (EB79b, page 443) identifies the following questionable scoring:-
 - The score for health (SA2) identifies that the site is not within 800m of a GP surgery, yet there is no recognition that Whaddon is the closest site in the district to the Gloucestershire Royal Hospital, or that the scale of development site could provide opportunity for new facilities in the local centre.
 - The scoring for vibrant communities (SA5) fails to recognise that residential development of Whaddon will see closure of the abattoir on the Stroud Road thus delivering benefit in terms of localised and occasional odour pollution.
 - The scoring for SA7 (biodiversity and geodiversity) demonstrates no understanding of the current baseline conditions on the site, including culverted and deep channelled sections of the Daniels Brook and its potential for habitat restoration and creation. Early Biodiversity Net Gain (BNG) calculations for the masterplan for Whaddon are demonstrating a 100%+ BNG with the development scheme.

- The scoring for flood risk (SA12) on Whaddon is wholly inaccurate by way of exaggerating flood risk on the site and concluding a significant negative likely. The Daniels Brook corridor is currently a deep narrow channel unsympathetically engineered over the years to suit efficient management of the land, reducing flood risk in practice. The proposed development scheme will also reprofile the watercourse and remove existing culverts where possible to further reduce flood risk. TW have undertaken extensive flow monitoring and flood modelling, including workshops with the EA to propose an well informed enhancement scheme for the watercourse. This will deliver substantial improvements to the Daniels Brook in respect flood risk, environmental quality and biodiversity and ongoing management, including to the benefit of downstream flood risk in the City by enabling more natural flood storage capacity with a re-profiled watercourse.
- The scoring for economic growth (SA17) highlights a negative aspect that the site is not within 800m of a school. This is inaccurate as the allocation site is comfortably with 800m of St Peters High School and Willow Primary Academy and the draft G2 allocation policy also seeks school provision on-site.

14. Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council's Vision?

9. In considering this question, and consistent with our earlier representations, essentially, it is not readily apparent how the strategic allocations at Sharpness and Wisloe Green conform with Strategic Objectives, particularly S01: Accessible Communities and S04: Transport and Travel.

15. Core Policy CP3 states that proposals for new development should be located in accordance with the hierarchy. The Council indicates this will assist in delivering sustainable development, by concentrating growth in those settlements that already have a range of services and facilities.

a. Has the settlement hierarchy been derived using a robust and justified process and is it supported by credible evidence?

10. The lack of recognition within the settlement hierarchy for the role of the Gloucester City urban area in respect of its physical and functional relationship with Stroud District remains a glaring omission of CP3. The policy is inward looking only and some recognition toward the presence of Gloucester City abutting the district boundary should be provided. Indeed, the later section of the plan 'Shaping the future of Gloucester's rural fringe' recognises Gloucester as a major strategic provider of

services, facilities and employment, and throughout EB71 and EB72, the role and proximity of Gloucester is evidenced as a key factor for commuting patterns in the District. Thus, some regard towards Gloucester should be set out in CP3 given the role of the settlement hierarchy to inform the spatial strategy.

27. Is the site selection methodology justified and does it accord with national planning policy and guidance?

11. There remain illogical inconsistencies between the assessment approach as set out in EB9 and the SA in respect of Whaddon, specifically identifying it as remote from a Tier 1-3 settlement and thus marking down its performance, yet the SA demonstrating that notwithstanding our questioning some of the scoring, the site nevertheless performs very well towards sustainable development objectives. For the reasoning highlighted by this statement, the site is inherently sustainable by comparison to other strategic sites in the plan, and its suitability of housing allocation is beyond question.