

ON BEHALF OF REDROW HOMES (SW) LTD

REPRESENTATIONS TO STROUD DISTRICT

COUNCIL'S LOCAL PLAN REVIEW

'ADDITIONAL HOUSING OPTIONS'

CONSULTATION

IN RESPECT TO LAND NORTH OF HYDE

LANE, WHITMINSTER

December 2020

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

IN RESPECT TO LAND NORTH OF HYDE LANE, WHITMINSTER

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1.0 INTRODUCTION

- 1.1 On behalf of Redrow 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 16th December 2020. This is with particular reference to land north of Hyde Lane, Whitminster, which is being promoted by Redrow 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 We are pleased to see that Whitminster is being considered as an option under the 'Additional Housing Options' consultation paper but the scale of development anticipated here could be expanded to create a more viable source of supply when compared to the more flawed strategic options we will discuss in this document.
- 1.5 Land north of Hyde Lane, Whitminster (the site) is capable of accommodating circa 200 homes and landscaping / open space within the new Local Plan. This is not an option currently being

considered by SDC but we consider that it could further boost supply at Whitminster, which we consider to be a suitable location for development, and thereby provide an alternative source of supply to compensate for the removal of existing unsound proposed allocations. It would also help to provide a broader portfolio of sites 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 Whitminster 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 – Site Access, Junction Visibility Splays, Pedestrian Refuge and Vehicle Refuse Plans
- Appendix C – Ecological Appraisal
- Appendix D – Walking and Cycling Isochrones

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. We have examined the previous representations submitted by Barton Willmore in January 2020 and are in broad agreement with their conclusions; as such, we have expanded on a number of their concerns and have responded to the questions raised as part of this consultation, 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.

1.8 Primarily we consider that the strategy relies too heavily on strategic-scale sites, and some of the strategic sites it selects 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 overreliance on larger sites and further focus provided on the more appropriate location of Whitminster. Additionally a broader and more diverse portfolio of land should be allocated in varying sizes to deliver homes and other development over the next five years and beyond; this should include adding land at Whitminster which will diversify the portfolio of land owners here, and hence potential production outlets, in this sustainable location. We consider that this more diverse portfolio

solution presents the most sustainable and credible option for meeting the increased housing need set out by MHCLG.

- 1.10 Land north of Hyde Lane, Whitminster offers a highly sustainable location for new development which meets the needs of the settlement – we are pleased to see additional growth being considered here as it has been previously overlooked by SDC as a credible option. This site is of a scale that could deliver the critical mass of development to provide new infrastructure for the settlement and sustain everyday facilities and services. It could also be delivered quickly, possibly in advance of the larger strategic allocation to the south to boost housing supply in the short term.

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 Whitminster described as a Tier 3a settlement.

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

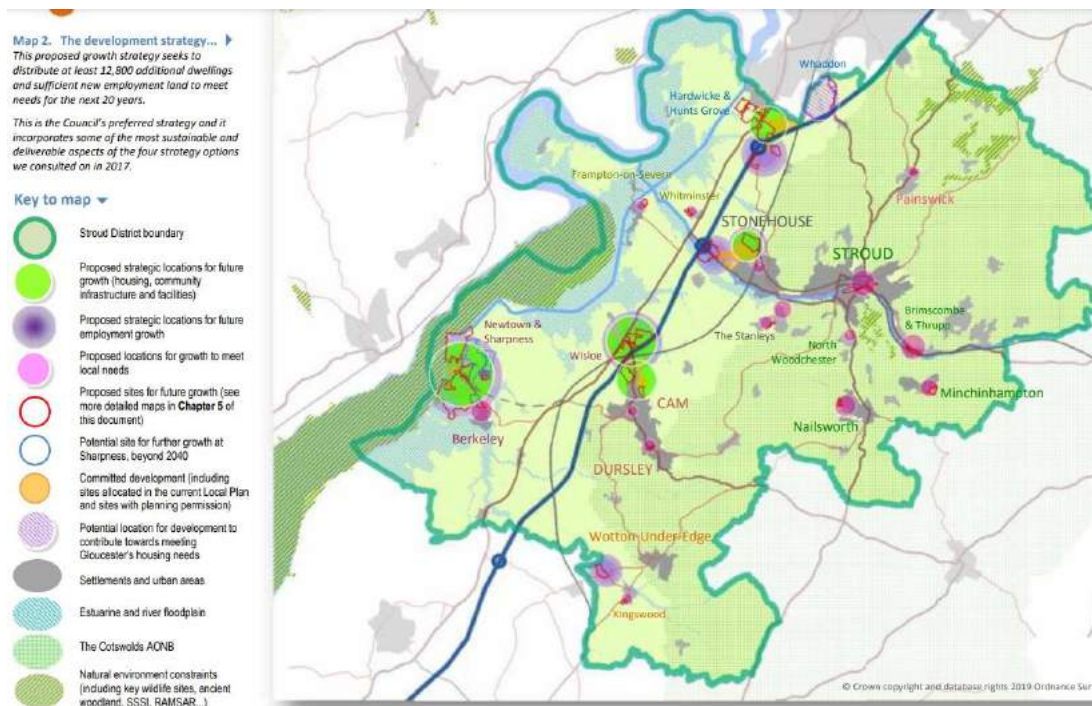


Figure 1. Proposed Development Strategy for Stroud

3.4 As the map clearly shows, there is no significant planned development for Whitminster in the current Local Plan – only two allocations at Land west of Upton's Gardens for 10 units (PS45) and Land west of School Lane for 30 dwellings (PS46). This is inappropriate given the scale of the existing settlement, the affordable needs that will be arising from this population and the sustainability merits of the location in terms of the ability to maintain and strengthen public transport provision. We are therefore pleased to see consideration being given to an additional growth point at Whitminster.

Strategic Sites

- 3.5 We have also 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	Total commitments (= A + B + C)	5,740
	E	Commitments (D) minus undeliverable sites	5,223
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	Minimum residual housing requirement to 2040 (= F + G - E)	7,993
		Allocated sites in Draft Local Plan	8,725
		Small sites allowance (75 pa x 18 years)	1,350
		Total housing supply in Draft Local Plan	10,075

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)
Total	At least 8,700

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
% of Total Supply	50%	19%	36%	36%

3.9 If the AHO 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
% of Total Supply	62%

- 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 in our view.
- 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 In particular, 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. The housing that would be lost by removing these two strategic scale, but inappropriate allocations, should then be re-distributed as smaller-scale allocations at smaller settlements, such as at Whitminster and Kingswood 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;
- To compensate for the loss in housing numbers resulting from the reconsideration of these three strategic sites we suggest the following approach is adopted:
 - 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;
 - The proposed capacity of Whitminster, the evidence for which is much more robust and compelling, be increased and Redrow's land interest at this location be included in an expanded allocation to circa 2,500 homes.

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 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. 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.

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 (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.
- 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.

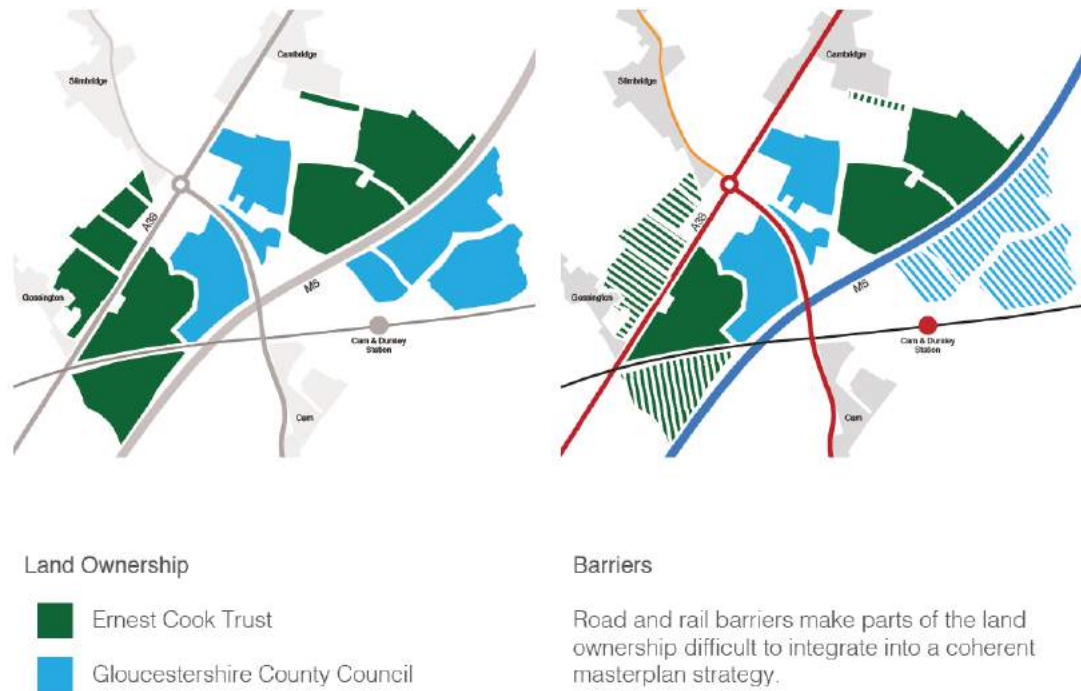


Figure 4. Extract of Wisloe Garden Village promotion material which shows the different land ownerships

- 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.
- 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 34,665m² 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 m² 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.
- 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 Paul Basham Associates who are supporting Redrow Homes on technical highways matters have considered this issue and 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.

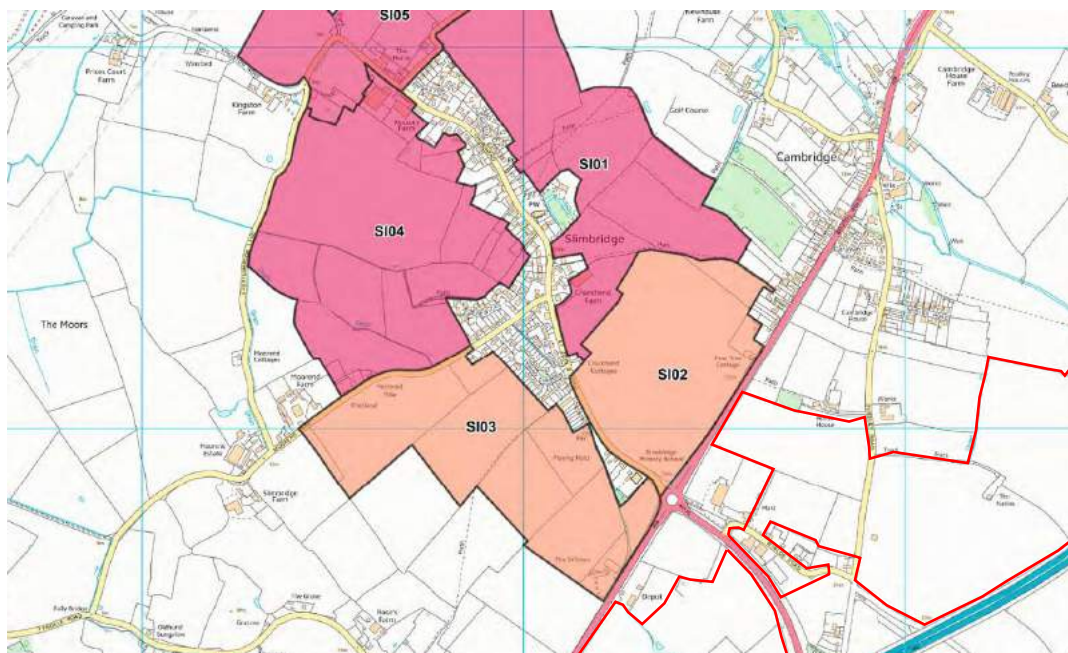


Figure 5. Extract of SDC's Landscape Sensitivity Assessment 2016 (part of Wisloe allocation shown in red) – no updates appear to have been undertaken in support of the Local Plan Review

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).

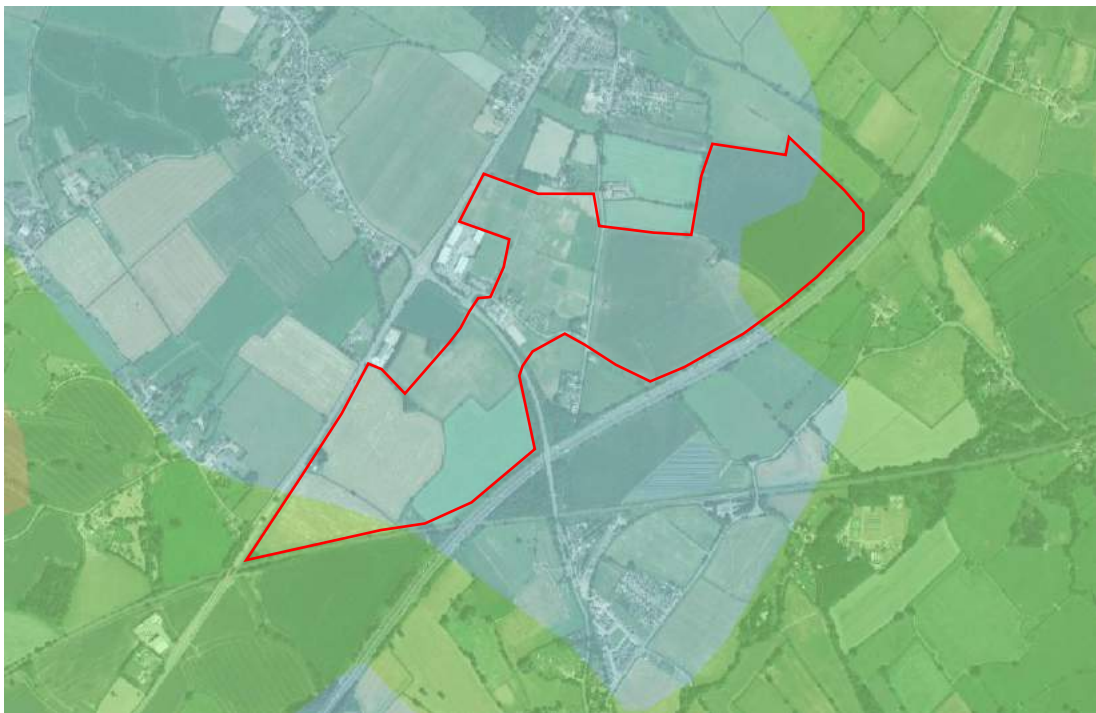


Figure 6. Extract of Agricultural Land Quality Maps which show the majority of the Wisloe allocation is Grade 2 (light blue) with a small proportion Grade 3 (approximate site area shown in red)

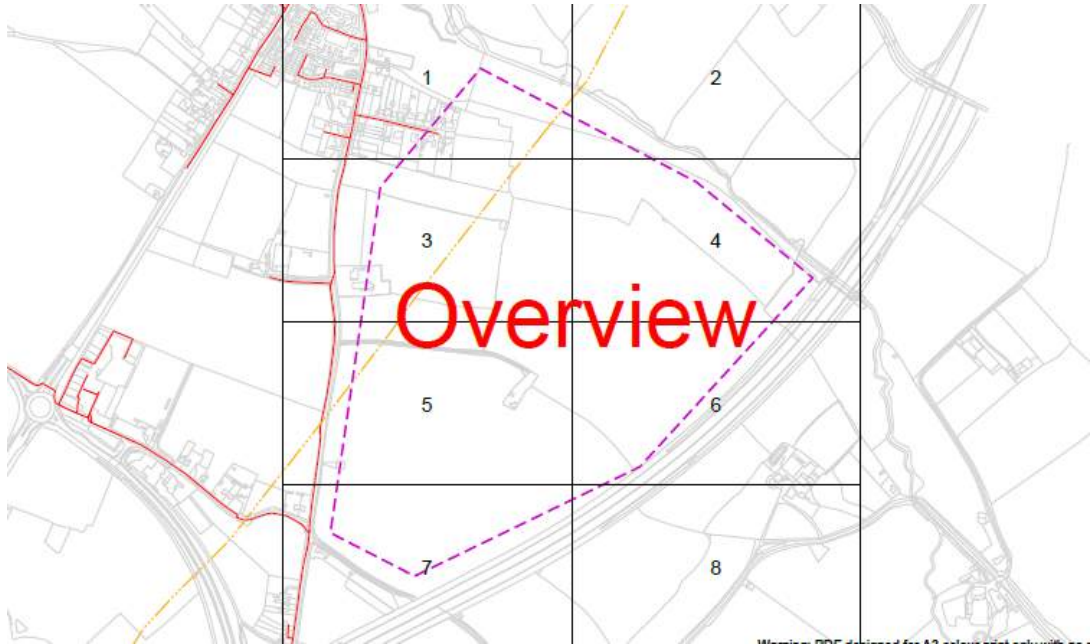
Noise

- 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.



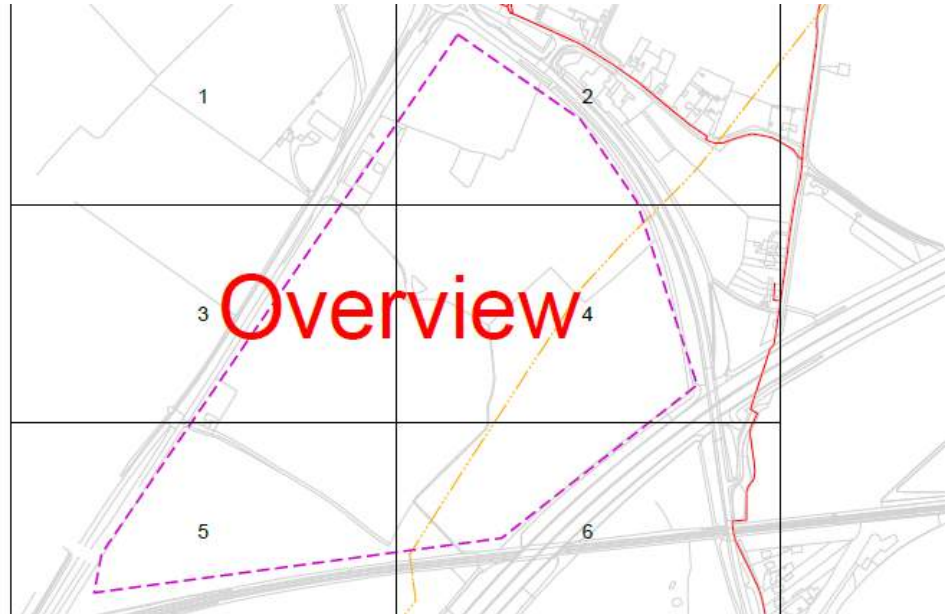


Figure 7. Route of High Pressure Gas Pipe owned by WWU crossing the allocation at Wisloe (shown with orange broken line)

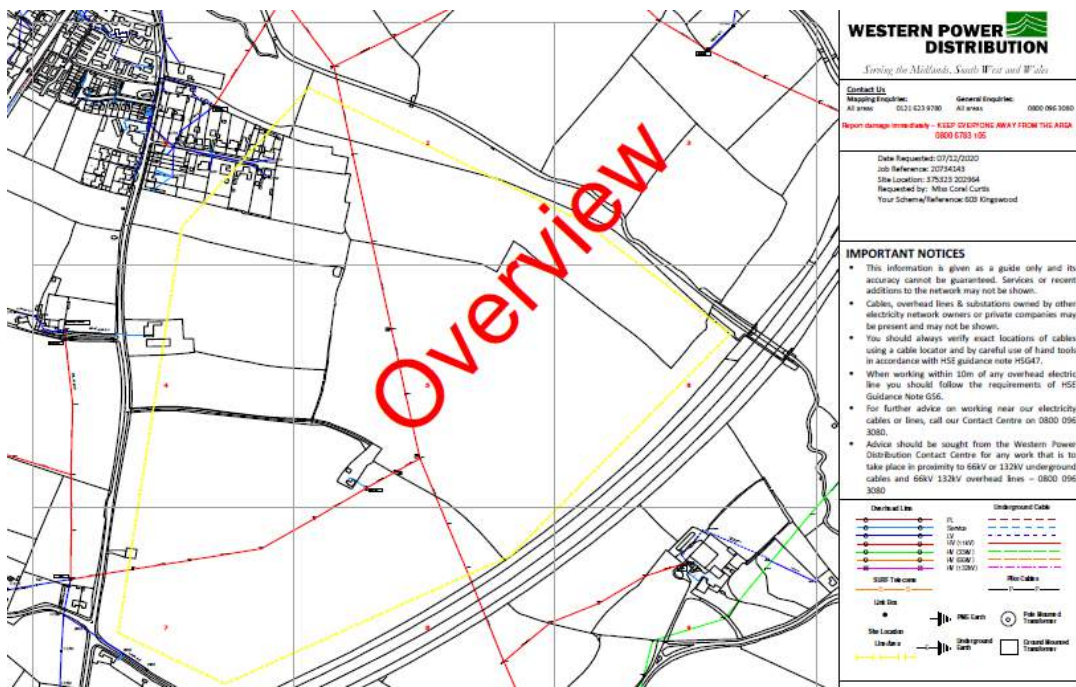


Figure 8. Extract of WPD showing overhead lines / underground cables owned by WPD (red line)

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 WHITMINSTER

5.1 Whitminster is identified by SDC as a 'Tier 3a Accessible Settlement with Local Facilities' settlement. The draft Local Plan acknowledges that these are '*relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self-containment*'. Whilst originally there was only limited development proposed in this location for circa 40 dwellings, we are pleased to see an additional growth point and a selection of smaller sites now being considered at this settlement.

5.2 Whitminster has a strong economic role and is a net importer of workers (1.41 jobs per economically active resident), compared to other settlements in the District which see a net export of workers (as table 3 shows below which is an extract of data taken from Stroud's Settlement Role and Function Paper Update 2018). This is only bettered by Kingswood and Stonehouse.

Table 3. Number of Jobs to economically active residents

Settlement	Ratio of Jobs : Workers
Stonehouse	1.75 : 1
Kingswood	1.63 : 1
Whitminster	1.41 : 1
Brimscombe	1.06 : 1
Eastington (Alkerton)	1.06 : 1
Frampton on Severn	1.04 : 1
Upton St Leonards	0.98 : 1
Minchinhampton	0.88 : 1
Stroud	0.84 : 1
Painswick	0.82 : 1
Nailsworth	0.78 : 1
Berkeley	0.72 : 1
Dursley	0.69 : 1
Newton & Sharpness	0.65 : 1
Chalford	0.56 : 1
Uley	0.56 : 1
Wotton-under-Edge	0.53 : 1
Hardwicke	0.51 : 1
Cam	0.47 : 1
Leonard Stanley	0.42 : 1

Kings Stanley	0.41 : 1
Whiteshill & Ruscombe	0.38 : 1
Manor Village (Bussage)	0.36 : 1

5.3 We therefore agree with the proposed allocation of land in Whitminster as a new growth point, however, there needs to be further housing growth to respond to the available number of jobs in the area, to address the balance of net importation of workers. Development here would reduce travel times and provide options for those already working in the Whitminster to live nearby. This strong economic role should also be supported by providing additional housing land, and we therefore welcome the proposal to include 13 hectares of such land as part of the proposed allocation.

5.4 As set out, Stagecoach appear to be supportive of development in locations such as Whitminster, commenting the following in their representations:

"We see a compelling case to extend the "rapid transit" corridor that in the draft LTP terminates at Hardwicke, south into the District along the A38 past Whitminster, at the very least to Stonehouse / Great Oldbury, but also to Stroud".

"... Whitminster seems to have been substantially and incomprehensibly under-rated by the [Settlement Role and Function Study 2018] study, even on the basis of the current service offer. Berkeley, Sharpness and Newton seem to have been systematically over-rated".

"... Whitminster is also relatively close to Gloucester, and offers the immediate prospect of direct, frequent and relatively fast public transport journeys both to there and Stonehouse and Gloucester. The settlement lies directly on the Sustainable Movement Corridor of the A38".

5.5 Given the settlement's location directly off the A38, it would seem logical to place development here where public transport connections can be more easily improved and expanded upon. The alternative approach of seeking to create such improvements in an area like Sharpness, where providers such as Stagecoach have confirmed it would be unviable, is not a justified strategy and is therefore unsound. For the reasons set out, Sharpness should be removed as a proposed allocation and replaced with land at Whitminster, comprising a mix of both strategic-scale and smaller-scale sites.

6.0 **OUR PREFERRED SPATIAL OPTION – ANSWERS TO SPECIFIC QUESTIONS**

6.1 Taking the findings of the preceding sections of this statement, and the previous representations undertaken by Barton Willmore in support of the land at Hyde Lane, 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?

6.2 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

6.3 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. We are aware that this has been achieved at emerging allocations such as Hardwicke and Stonehouse. This is extremely positive but without this evidence on other allocations, selecting this option would in effect be predetermining a strategy which is an unsound approach.

Q1b – Option B Towns and Villages

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

Q1c – Option C Additional Growth Point

6.5 We agree that a new 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.

Q1d – Options D Wider Dispersal

- 6.6 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?

- 6.7 Yes

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

- 6.8 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?

- 6.9 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, such as at Stonehouse and Hardwicke.
- 6.10 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. These should be replaced with a single strategic allocation of land at Whitminster, supplemented by a significant number of non-strategic scale site allocations which can be delivered more quickly, ensuring a five-year housing land supply is maintained and addressing the balance in portfolio of sites. These smaller-scale allocations should include land north of Hyde Road, which we will go onto discuss, and land north of Charfield Road, Kingswood, for reasons we have set out in our separate representations.

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?

- 6.11 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?

- 6.12 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?

- 6.13 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**
- 6.14 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.
- 6.15 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 7 – Do you support or object to the development of the sites identified?

7a – BER016 Hook Street Farm, Berkeley

7b – BER017 Bevans Hill Farm, Berkeley

- 6.16 We support growth at Berkeley as a Local Service Centre which has significant facilities, services and employment available. We would refer readers to the representations undertaken by Avison Young in respect to specific allocations at Berkeley but agree with their comments that land controlled by Redrow Homes (SW) Ltd is the most suitable option for growth.

7c – HAR017 Land at Sellars Road, Hardwicke

- 6.17 We have no objections to the inclusion of this site given it is a small-scale development on the edge of an existing town which should easily be able to be delivered within five years and is likely to be built by a small to medium-scale housebuilder, which is supported by the NPPF.

7d – STR065 Beeches Green Health Centre

- 6.18 As it has been confirmed that the site is no longer required for operational reasons we support the loss of this health centre to make way for residential development and health and community uses on this brownfield site.

7e – Land south of Hyde Lane, Whitminster

- 6.19 We strongly support growth at Whitminster and as set out in the Stagecoach representations this area has been overlooked in terms of its ability to accommodate growth, its functional relationship with other settlements in terms of the provision of facilities and services and public transport links which are available in the area.
- 6.20 While we have no objection to the allocation of land south of Hyde Lane we consider that land north of Hyde Lane and west of the A38, controlled by Redrow Homes, is a suitable option for development and should also be considered alongside the other allocations being considered in this location.

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

6.21 We will go onto discuss the benefits of allocating land north of Hyde Lane, Whitminster, in the next section of this statement.

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

9a – PGP1 – Land at Grove End Farm, Whitminster

6.22 As set out we support growth at Whitminster given its sustainability credentials and links to the Transport Movement Corridor, which can be more easily enhanced than the infrastructure proposed at Sharpness. Development at Whitminster is supported by Stagecoach who are a major bus operator in the region, whereas they have confirmed there is no business case for extending service provision to Sharpness. This is compelling and damning evidence against this proposal.

6.23 For the reasons set out we suggest that both Wisloe and Sharpness are removed and replaced with strategic growth at Whitminster, as the extent of which should be expanded to include land north of Hyde Lane.

9b – PGP2 – Broad location at Moreton Valence

6.24 We do not support this proposed allocation for the reasons described in paragraphs 4.39 – 4.43 of 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 9 and 10 below show. NPPF policy (paragraph 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?

6.25 We do not consider that further growth points are needed in addition to Whitminster; 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. As set out we consider there is further scope for growth at Whitminster to reinforce its strong economic and public transport credentials and propose that Redrow's land interests north of Hyde Lane be added to this allocation.

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

6.26 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 NORTH OF HYDE LANE, WHITMINSTER**

Introduction

- 7.1 Redrow Homes (SW) Ltd have a commercial agreement in place with the landowners of land north of Hyde Lane. The land is identified on the site location plan which is enclosed as Appendix A to this document and amounts to a total of 7.7 hectares of land.
- 7.2 The site has been presented as part of representations made on behalf of Redrow Homes during previous consultation stages including the 'Draft Local Plan' consultation undertaken in January 2020.
- 7.3 The site comprises two parcels of agricultural land which are irregularly shaped and divided and bound by hedgerows. To the south lies the main settlement of Whitminster.

Accessibility

- 7.4 The site is well located and lies on the urban edge of Whitminster and the A38 to the east. Whitminster itself contains a number of everyday facilities, including a garden centre, clothing shop, primary school, playing fields / football club, pub, camping shop, convenience store and mobile post office service.
- 7.5 To the east and west of Whitminster lies Stonehouse and Frampton-on-Severn, where there are a multitude of everyday facilities and services capable of meeting everyday needs. This is easily accessible via public transport using the existing bus stops in proximity to the site, which carry services including the numbers 6, 60, 167, 242, 346 and 860 – between them these provide a service level of circa 4 buses per hour.
- 7.6 The Stagecoach representations submitted earlier this year highlight the potential to expand and improve these services which already see a significant amount of traffic flow in this location with ease, with the strategy for improving this already agreed and costed.
- 7.7 Proportionate development in this location could therefore support, sustain and enhance existing facilities and services through the provision of the critical mass required to make a viable business case for enhancing and improving infrastructure.

Statutory Designations

- 7.8 The site lies outside of the development boundary of Whitminster but is not designated within the Green Belt, Flood Zone, Conservation Area, SSSI, AONB, Special Landscape Area, Air Quality Management Area or otherwise. The site is therefore unconstrained in terms of policy designations.

Historic Assessment of the Site

- 7.9 The site was assessed as part of the Strategic Assessment of Land Availability (SALA) in 2019 (Ref: WHI010). The site was rejected for the following reason:

"The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site, highly visible to the north and separate from the main part of the settlement in open countryside. There are therefore potential impacts preventing sustainable development in this location".

- 7.10 We consider that through appropriate landscape technical work and adequate mitigation, these issues can be overcome.

Highways

- 7.11 Accessibility has already been discussed above, however in terms of highways safety Clarkebond have assessed the potential access into the site including visibility splays and are comfortable that circa 200 dwellings can be delivered in this location with no adverse impact on the highways network.

Flood Risk & Drainage

- 7.12 The site lies within Flood Zone 1 and is at low risk from flooding, as well as at a low risk from surface water flooding. As such soakaway testing will be undertaken to ascertain whether infiltration is possible across the site as a method of drainage, if not attenuation will be used and discharge to an existing outfall in close proximity to the site.

Ecology

- 7.13 A Phase 1 Ecological Assessment has been undertaken by Green Ecology for the land to the east in December. The assessment identified that there are limited ecological constraints to

this land however additional surveys have been recommended for birds, bats, reptiles, dormice, and Great Crest Newts.

- 7.14 Any assessment will contain a Biodiversity Net Gains Assessment which will seek to demonstrate a net gain in excess of 10%.

Proposed Development

- 7.15 The proposals can accommodate circa 200 dwellings and landscaping / open space opportunities. The proposals will incorporate a mix of dwellings and a policy compliant level affordable housing to meet both Whitminster's, and the wider district's, needs.

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 and allocations distributed in more sustainable and suitable locations, such as by elevating the allocations at Whitminster to provide additional supply to meet objectively assessed need, in a highly sustainable location that is supported by public transport providers.
- 8.3 These locations already have planned transport improvements which have been agreed and costed with a major bus operator, they will therefore be vast opportunities for alternatives to the private car to access everyday facilities and employment areas. We are therefore pleased to see Whitminster being considered as an area for growth as previously it appears that SDC have overlooked this settlement and its sustainability credentials in previous iterations of the Local Plan Review.
- 8.4 We consider that a 'blend' of all the spatial strategy options 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.
- 8.5 With respect to land north of Hyde Lane, 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.
- 8.6 We therefore conclude that land north of Hyde Lane, Whitminster should be allocated for circa 200 dwellings and landscaping / open 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.

APPENDIX A – SITE LOCATION PLAN

Whitminster Site Location Plan



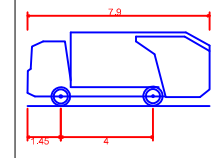
Promap v2
LANDMARK INFORMATION

Ordnance Survey © Crown Copyright 2020. All Rights Reserved.
Licence number 100022432
Plotted Scale - 1:2500. Paper Size - A4

- Redline boundary

**APPENDIX B – SITE ACCESS, JUNCTION VISIBILITY SPLAYS, PEDESTRIAN REFUGE AND
VEHICLE REFUSE PLANS**

DWG INFO: M:\BS1192\B05128 - WHITMINSTER\01_WIP\DR_DRAWING\B05128-T-SK01A,SK02A,SK03A,SK04A,SK05A-WHITMINSTER ACCESS PROPOSAL



DB32 Refuse Vehicle
 Overall Length 7.900m
 Overall Width 2.400m
 Overall Body Height 3.183m
 Min Body Ground Clearance 0.388m
 Max Track Width 2.400m
 Lock to lock time 6.00s
 Kerb to Kerb Turning Radius 9.625m

7.900m
 2.400m
 3.183m
 0.388m
 2.400m
 6.00s
 9.625m

CDM RESIDUAL RISKS
 The work shown on this drawing is both familiar to the designers and routinely safely built in similar circumstances by competent contractors.
 Risks are not considered significant.
 Relevant data is included in the Pre-Construction Information Pack
 Signed: .. Date:

DO NOT SCALE THIS DRAWING FOR CONSTRUCTION PURPOSES.

CONTRACTOR TO CHECK ALL DIMENSIONS AND REPORT ALL ERRORS AND OMISSIONS TO THE ENGINEER

Rev	Detail	By	Chk	Date
A	FOOTPATHS ALTERED TO 1.8m WIDTH	CWB	DAK	09.09.19

Revisions

clarkebond

MULTIDISCIPLINARY ENGINEERING CONSULTANTS

The Cocoa House
 129 Cumberland Road
 Bristol BS1 6UY



Bristol Exeter London

Client
Redrow Homes

Project
WHITMINSTER

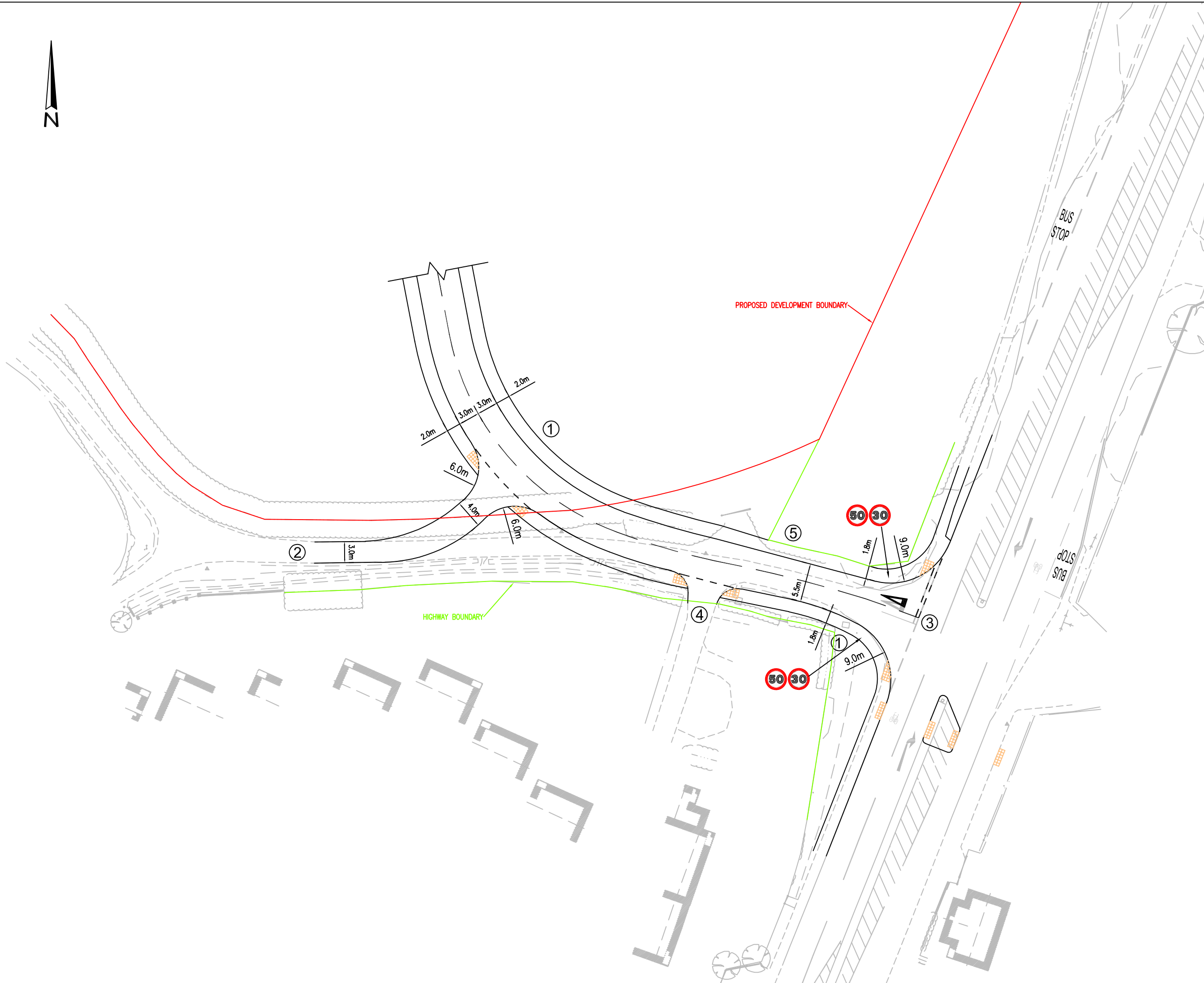
Drawing Title
**VEHICLE TRACKING –
 PAST PEDESTRIAN REFUGE**

Drawing Status
DRAFT

Project No.	Discipline	Drawing No.
B05128	C	SK05
Scale	Date	Revision
1:500	05.09.19	
Drawn	Checked	Sheet Size
CWB	DAK	A3
		A

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- NOTES:**
 DESIGNED WITH REFERENCE TO THE MANUAL FOR GLOUCESTERSHIRE STREETS
1. CARRIAGEWAY WIDENED TO ACCOMMODATE TURNING VEHICLES
 2. CARRIAGEWAY TIES INTO EXISTING CARRIAGEWAY
 3. EXISTING JUNCTION MOVED TO ACCOMMODATE FOOTPATH
 4. EXISTING JUNCTION
 5. LOCALIZED NARROWING OF FOOTWAY

A	FOOTPATHS ALTERED TO 1.8m WIDTH	CWB	DAK	09.09.19
Rev	Detail	By	Chk	Date

Revisions

clarkebond
 MULTIDISCIPLINARY ENGINEERING CONSULTANTS
 The Cocoa House
 129 Cumberland Road
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 Bristol Exeter London

Client
Redrow Homes

Project
WHITMINSTER

Drawing Title
SITE ACCESS PROPOSAL

Drawing Status
DRAFT

Project No.	Discipline	Drawing No.
B05128	C	SK01
Scale	Date	Revision
1:500	05.09.19	
Drawn	Checked	Sheet Size
CWB	DAK	A3
		Revision
		A

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DB32 Refuse Vehicle
 Overall Length 7.900m
 Overall Width 2.400m
 Overall Body Height 3.183m
 Min Body Ground Clearance 0.388m
 Max Track Width 2.400m
 Lock to lock time 6.00s
 Kerb to Kerb Turning Radius 9.625m

A	FOOTPATHS ALTERED TO 1.8m WIDTH	CWB	DAK	09.09.19
Rev	Detail	By	Chk	Date

Revisions

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Client
Redrow Homes
 Project
WHITMINSTER

Drawing Title
VEHICLE TRACKING – REFUSE

Drawing Status
DRAFT

Project No.	Discipline	Drawing No.
B05128	C	SK02
Scale	Date	Revision
1:500	05.09.19	
Drawn	Checked	Sheet Size
CWB	DAK	A3
		Revision
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NOTES:

DESIGNED WITH REFERENCE TO THE MANUAL FOR GLOUCESTERSHIRE STREETS

1. CARRIAGEWAY WIDENED TO ACCOMMODATE TURNING VEHICLES
2. CARRIAGEWAY TIES INTO EXISTING CARRIAGEWAY
3. EXISTING JUNCTION MOVED TO ACCOMMODATE FOOTPATH
4. EXISTING JUNCTION
5. LOCALIZED NARROWING OF FOOTWAY

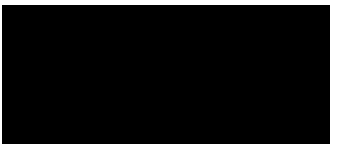
A	FOOTPATHS ALTERED TO 1.8m WIDTH	CWB	DAK	09.09.19
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Rev	Detail	By	Chk	Date
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Revisions

clarkebond

MULTIDISCIPLINARY ENGINEERING CONSULTANTS



Bristol Exeter London

Client

Redrow Homes

Project

WHITMINSTER

Drawing Title

JUNCTION VISIBILITY

Drawing Status

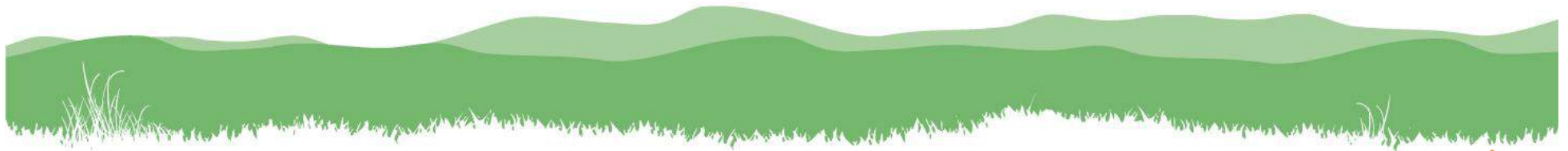
DRAFT

Project No.	Discipline	Drawing No.
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Drawn	Checked	Sheet Size
CWB	DAK	A3

APPENDIX C – ECOLOGICAL APPRAISAL



Ecological Constraints and Opportunities Report

Hyde Lane, Whitminster, Stroud, Gloucestershire

(central OS grid reference: SO 777 085)

A report on behalf of Redrow Homes

Ref: 1012-ECOP-FM

www.green-ecology.co.uk - [REDACTED]

Green Ecology is a trading name for GE Consulting Services (UK) Ltd registered number 08435536
Registered office: Unit 11A, Gidleys Meadow, Christow, Devon, EX6 7QB. VAT Number 160595992

1. Introduction

This document has been produced by Green Ecology on behalf of Redrow Homes to provide preliminary ecological constraints and opportunities at the above site.

Note that this document aims to provide design and planning advice prior to further surveys that may be required, and it is not intended to be submitted with a planning application to develop the Site. However, recommendations have been provided below with a view to support and enhance any future applications.





2. Site Survey

The survey comprised an Extended Phase 1 Habitat Survey and habitat condition assessment undertaken on 23 December 2019, supplemented by a desk-based study, whereby biological data was obtained from the Gloucestershire Centre for Environmental Records (GCER). This survey identified the potential for protected species for which surveys need undertaking (see **Section 5**).

3. Results

Figure 1 shows the survey area and identifies key constraints as well as opportunities to avoid, mitigate and enhance key ecological features.

Table 1 provides more detail of issues for consideration. In summary, recommendations are made to ensure the design meets nature legislation and the principles of the NPPF and local policy, including:

-  Sites of importance to wildlife should be safeguarded, e.g. SACs/ SPAs, SSSIs, locally designated sites and ecological networks/ corridors;
-  Developments should apply the mitigation hierarchy: avoid, mitigate, compensate;
-  Avoid loss of irreplaceable habitat e.g. ancient woodland or trees;
-  Conservation and enhancement of biodiversity is supported, especially where this secures measurable net gains for biodiversity.

4. Biodiversity Net Gain

The Government are planning to roll out a requirement for achieving a 10% net gain in biodiversity for all developments once the Environment Bill is enacted. This 10% gain relates to both linear habitats (e.g. hedgerows) and non-linear habitats (e.g. grassland/woodland) and requires the use of a 'metric' to calculate the required biodiversity units. Some LPA's already request the use of the metric through current or emerging policies. For this site, the use of the metric should be confirmed with the LPA ecologist.

Habitats of high 'distinctiveness' should be targeted for retention such as hedgerows, woodland and watercourses and new habitats with high distinctiveness can be created

to provide net gains. Offsite measures may be acceptable through legal agreements but should only be sought once all on-site options have been explored.

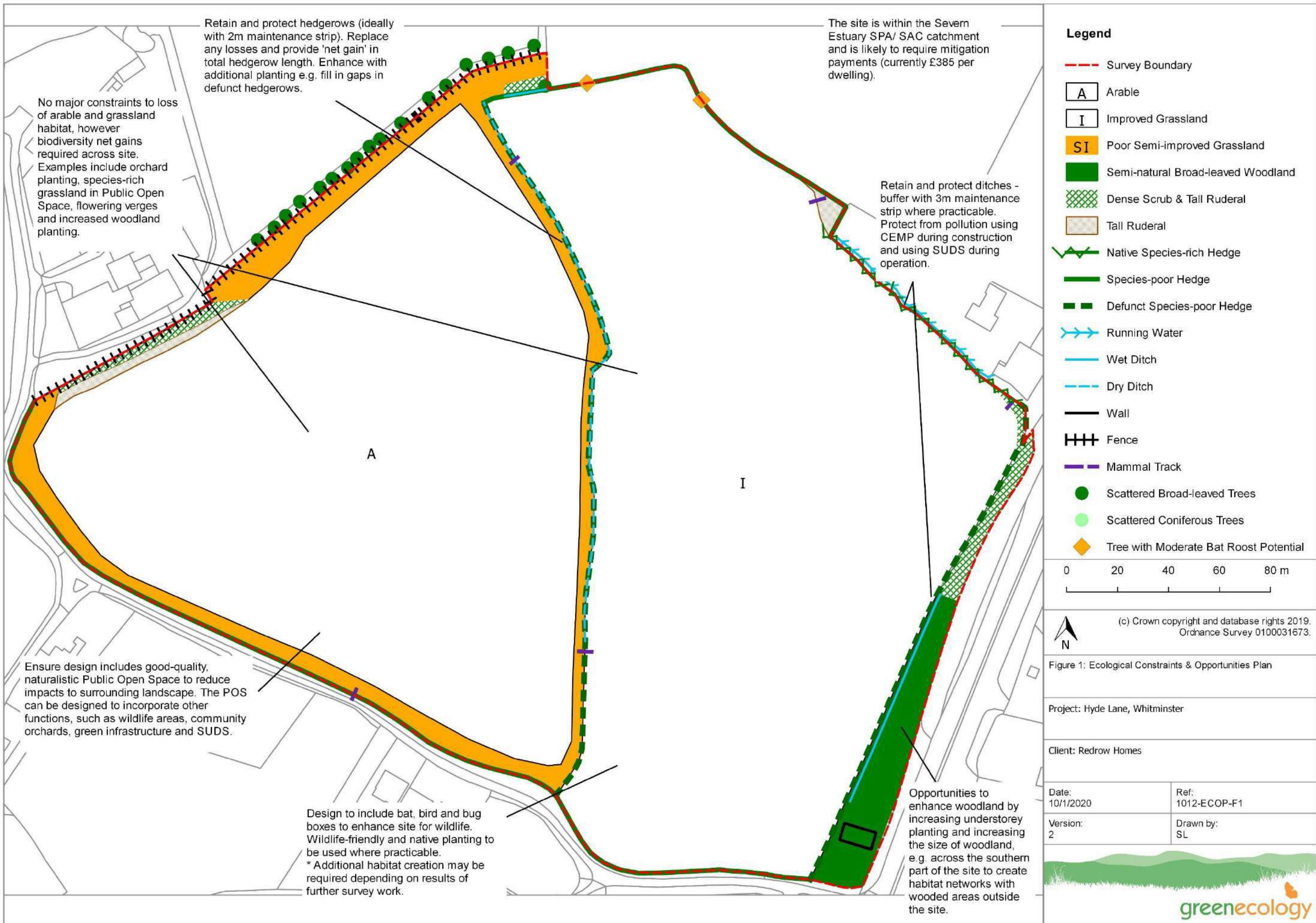
Refer to **Tables 2 & 3** for an indication of the BNG requirements on this Site.

4. Further Survey Work

The timeline below shows the further ecological survey work that would be expected to accompany a planning application and to inform suitable mitigation.

TASK	Jan Mar	-	Apr	May	Jun	Jul	Aug	Sept	Oct Dec	-
Bird surveys – requirement/ scope to be agreed with LPA as to need for winter bird surveys.										
Commuting/ foraging bats – (1 transect walked monthly & 3 static automated bat detectors per visit, for 5 nights)										
Reptiles (8 visits, approx. 50 refugia)					Sub-optimal					
Dormouse survey (50 tubes April/ May to September)										
Great crested newt eDNA survey										
Ecological Impact Assessment for Planning Application, including BNG Assessment										

Many of these surveys are seasonally constrained and therefore ecological advice early in the project programme is always recommended. However, if there are conflicts with the project timetable, please speak to a member of the team at Green Ecology at an early stage and we will make every effort to find a pragmatic approach that works within your time frame if possible.



Legend

- Survey Boundary
- A Arable
- I Improved Grassland
- SI Poor Semi-improved Grassland
- Semi-natural Broad-leaved Woodland
- Dense Scrub & Tall Ruderal
- Tall Ruderal
- Native Species-rich Hedge
- Species-poor Hedge
- - - Defunct Species-poor Hedge
- Running Water
- Wet Ditch
- - - Dry Ditch
- Wall
- - - Fence
- Mammal Track
- Scattered Broad-leaved Trees
- Scattered Coniferous Trees
- ◆ Tree with Moderate Bat Roost Potential

0 20 40 60 80 m

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Figure 1: Ecological Constraints & Opportunities Plan

Project: Hyde Lane, Whitminster

Client: Redrow Homes

Date: 10/1/2020	Ref: 1012-ECOP-F1
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Version: 2	Drawn by: SL
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Table 1: Preliminary Constraints and Opportunities Related to Development of Site

Ecological Receptor	Constraints and Likely Impacts During Construction and Operation	Recommended Mitigation, Opportunities and Enhancements
Designated Sites		
<p>Natura 2000 sites within 10km:</p> <ul style="list-style-type: none"> Severn Estuary SAC/ SPA/ Ramsar (3.7km west) Walmore Common SPA/ Ramsar (6.8km north-west) Rodborough Common SAC (8km south-east) Cotswold Beechwoods SAC (9.8km north-east) 	<ul style="list-style-type: none"> The Site is within the 7.7km Catchment Zone of the Severn Estuary, due to being at risk from increased recreational pressure (refer to Stroud District Council's Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site, December 2017). The Site is outside the Rodborough Common SAC Catchment Area for new housing within 3km of its boundary. The other sites are unlikely to be at risk from development of this Site. 	<ul style="list-style-type: none"> A financial contribution in accordance with the mitigation strategy will be required – currently £385 per dwelling to deliver strategic mitigation via a S106 Agreement. Alternatively, mitigation solutions could be proposed onsite in consultation with the LPA/ Natural England.
<p>Statutory sites within 2km:</p> <ul style="list-style-type: none"> Frampton Pools Site of Special Scientific Interest (SSSI) (1.9km south-west) <p>The Site is within an Impact Risk Zone for this SSSI; Natural England will be consulted for 'All residential applications with a total net gain in residential units.</p>	<ul style="list-style-type: none"> The Site is designated for standing water formed as a result of gravel extraction. The lakes support a diverse range of aquatic plants and invertebrates and is of local importance for wintering waterfowl. The SSSI is in largely unfavourable condition and may be sensitive to recreational pressure and changes in hydrology. There are footpaths linking the Site to the SSSI. 	<ul style="list-style-type: none"> Include good quality, linked and naturalistic Public Open Space (POS) within design, to provide recreational opportunities within the site itself. Ensure that no pollution/ hydraulic changes arise during construction and operation (e.g. through Construction Environmental Management Plan (CEMP) and Sustainable Drainage System).
<p>Non-statutory sites within 2km:</p> <ul style="list-style-type: none"> River Frome Mainstream & Tributaries LWS (0.8km) Mole Grove LWS (1.1km) Gloucester & Sharpness Canal LWS (1.7km) 	<ul style="list-style-type: none"> The river and canal Local Wildlife Sites will be susceptible to water pollution if pathways exist from the Site. Mole Grove is not publicly accessible and is not expected to be adversely impacted. 	<ul style="list-style-type: none"> Ensure that no pollution/ hydraulic changes arise during construction and operation (e.g. through Construction Environmental Management Plan (CEMP) and Sustainable Drainage System).
Habitats		
Arable/ Improved grassland (silage)	<ul style="list-style-type: none"> No major constraints – low value botanically and low distinctiveness. Compensatory habitat creation required under new Biodiversity Net Gain Metric. 	<ul style="list-style-type: none"> Scope to provide net gain by creating areas of species-rich grassland (especially along watercourse and hedgerows), flowering lawns on road verges and other higher quality habitat such as orchards, which are well-recorded in the surrounding area. POS provides good opportunities for providing recreational space as well as informal areas with wildlife value.
Plantation woodland	<ul style="list-style-type: none"> A small area of low value plantation woodland is present along the eastern boundary. 	<ul style="list-style-type: none"> Opportunities to enhance the woodland with additional understorey planting and extending its size, for example along the southern boundary to connect existing wooded/ orchard areas. Several traditional orchards are present locally and the scheme offers opportunities to create new orchards for community use.
Ditches	<ul style="list-style-type: none"> Small ditches are present on the northern and eastern boundaries. These are likely to drain into rhyes to the north. Potential impacts include pollution to downstream receptors. 	<ul style="list-style-type: none"> Ensure appropriate mitigation measures are in place during construction (e.g. CEMP). Create wildlife-friendly SuDS to prevent pollution incidents to water courses. This can include species-rich wetland meadow planting. Buffer ditches with minimum 3m where practicable to protect water

Ecological Receptor	Constraints and Likely Impacts During Construction and Operation	Recommended Mitigation, Opportunities and Enhancements
Hedgerows	<ul style="list-style-type: none"> Species-rich and species-poor hedgerows are a Habitat of Principal Importance (S41 of NERC Act), Gloucestershire BAP habitat and important ecological feature. 	<p>from pollution as well as allow access for management.</p> <ul style="list-style-type: none"> Retain where possible, restore and buffer (outside property boundaries) to allow future management. Enhance species-poor/ defunct hedgerows with additional planting. Can form part of green infrastructure strategy. Replace any losses and plant new native hedgerows to provide 'net gain'.
Fauna		
Birds	<ul style="list-style-type: none"> Protected under Wildlife and Countryside Act (WCA) 1981. Potential for offence to be committed by damaging/ destroying active birds' nests. A large number of notable birds have been recorded within 2km of the Site, including barn owl and wintering wildfowl (due to the proximity of the estuary). The hedgerows in particular may support breeding farmland birds of conservation concern. The scope of further surveys should be agreed with the LPA – whether winter bird surveys are required due to the proximity to the SPA. 	<ul style="list-style-type: none"> Retain trees and hedgerows that provide nesting habitat for birds. Provide new nesting opportunities e.g. new berry-producing shrubs, place nest boxes on retained trees and incorporate nest boxes into new buildings. Time vegetation clearance to avoid bird breeding season (March – August inclusive), including ground-nesting birds, or with a check for active birds' nests.
Bats	<ul style="list-style-type: none"> European Protected Species. Many bats are also Species of Principal Importance under the NERC Act 2006. Site boundaries (trees and hedgerows) may be important commuting/ foraging routes. Surveys required to establish key flyways. 	<ul style="list-style-type: none"> Identify key corridors for bats, retain and buffer these habitats where possible. Avoid direct lighting of key areas during construction and operation. Enhance site with additional roosting opportunities.
Reptiles	<ul style="list-style-type: none"> Protected under WCA 1981. Risk of an offence being committed (killing/ injury of reptiles) during clearance of suitable vegetation (e.g. woodland/ ditch edges, hedgerow bases, long grass). Surveys required to establish presence/ absence. 	<ul style="list-style-type: none"> Retain woodland areas and enhance 'edge' habitat. Enhance site to increase the value for reptiles e.g. habitat enhancement such as rough grassland, pond and log piles.
Invertebrates	<ul style="list-style-type: none"> The woodland, ditches and hedgerows are likely to support common/ widespread invertebrates and potentially some notable species. Ideally these habitats should be retained or suitable replacement habitats included in the design. 	<ul style="list-style-type: none"> The buildings could incorporate a green roof and bee/bug bricks. A range of habitats should be retained/ created within POS, including orchards to support specialist invertebrates. New planting schemes should include wildlife friendly species e.g. selected from the RHS Perfect for Pollinators list.
Great Crested Newt	<ul style="list-style-type: none"> There are a collection of four ponds within approximately 300m north-west of the Site and a further two within 500m. Great crested newts (European Protected Species) have been recorded 880m south-east. The majority of the Site provides low value foraging habitat, although the hedgerows and woodland provide some commuting and foraging potential. An eDNA survey should be undertaken in the first instance to establish [presence/ absence within 500m. If present, the development could result in a permanent loss of terrestrial habitat for this species and result in an offence under UK and EU legislation. Traditional survey and licensing techniques can be used, or the Stroud GCN District Licensing Scheme. 	<ul style="list-style-type: none"> It is recommended that initially eDNA samples are taken within ponds within 500m. If present, it may be possible to avoid further surveys through the Stroud GCN District Licensing Scheme. This is an optional approach but may reduce cost and speed up the licensing process. Alternatively, surveys of surrounding ponds should be undertaken, and appropriate mitigation undertaken on site – for example including high quality terrestrial habitat providing wildlife corridors and new ponds. A licence from Natural England may be required.

Ecological Receptor	Constraints and Likely Impacts During Construction and Operation	Recommended Mitigation, Opportunities and Enhancements
Dormouse	<ul style="list-style-type: none"> European Protected Species. The site provides good quality hedgerows for this species although there are no known records within 2km. Surveys required to establish presence/ absence. If present, a licence from Natural England is likely to be required for hedgerow removal. 	<ul style="list-style-type: none"> Avoid removal of hedgerows and woodland. If present, mitigation will involve additional hedgerow/ woodland planting (at least 2:1) and timing constraints to vegetation removal.
Water vole	<ul style="list-style-type: none"> Water vole are protected via the Wildlife & Countryside Act 1981 (as amended) – the larger ditch on the northern boundary may support this species and presence should be assumed (survey access not possible). 	<ul style="list-style-type: none"> Buffer ditch to avoid disturbance of riparian mammals.

Table 2: Biodiversity Metric Indicative Baseline Calculations (Habitats)

Habitat Distinctiveness	Habitats on Site	Current Condition	Units on Site	Requirements to Deliver Gain	Likely Delivery
Very Low	None	N/A			
Low	Modified/ Improved Grassland, Arable and Ruderal Vegetation	Poor	16.3	Same distinctiveness or better habitat required	<ul style="list-style-type: none"> Retain existing grassland where possible e.g. in buffers and enhance to 'good' condition Create species-rich meadow (higher distinctiveness) Create other high distinctiveness habitats e.g. scattered trees, woodland, orchard, marshy grassland, ponds, wetland
Medium	Mixed Scrub	Poor	0.18	Same broad habitat or a higher distinctiveness habitat required	<ul style="list-style-type: none"> Retain and enhance to 'good' condition Replace with broadleaved woodland
High	None	N/A			
Very High	None	N/A			

Table 3: Biodiversity Metric Indicative Baseline Calculations (Hedgerows)

Habitat Distinctiveness	Habitats on Site	Current Condition	Units on Site	Requirements to Deliver Gain	Likely Delivery
Very Low	None	N/A			
Low	Native Species-Poor Hedgerow	Moderate	4.28	Same distinctiveness or better.	<ul style="list-style-type: none"> Retain and enhance to 'good' condition Create new species-rich hedgerows to replace losses and provide net gain
		Good			<ul style="list-style-type: none"> Retain where possible Create new species-rich hedgerows to replace losses and provide net gain
Medium	Species-rich Hedgerows	Moderate	3.53	Like for like or better	<ul style="list-style-type: none"> Retain and enhance to 'good' condition Create new species-rich hedgerows to replace losses and provide net gain
High	None	N/A			

Very High	None	N/A
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NOTE – more biodiversity units are available when habitats are retained and protected during construction, and then ‘enhanced’ through management. A detailed assessment will be required as the scheme develops, which will indicate the habitat areas required. To achieve a 10% gain (if requested by LPA), the Site will need to demonstrate 18.1 habitat units and 8.6 linear (hedgerow) units.

6. Conclusions

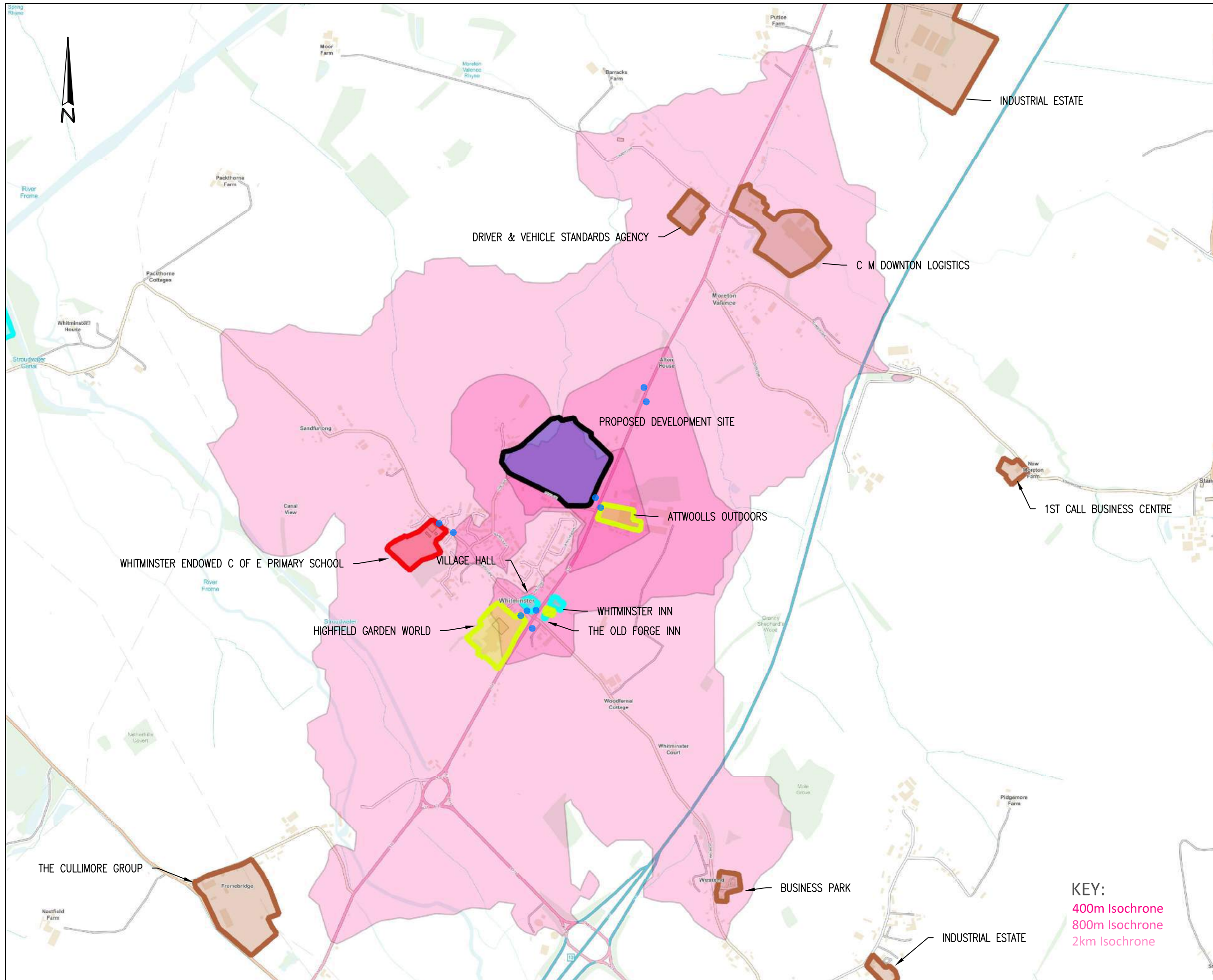
The preliminary survey work has not identified any major ecological constraints to development of the site.

Whilst further surveys are required to help fully inform the emerging masterplan for the site, it is considered that the habitats of ecological value can be readily accommodated into a sensitively designed scheme and measures can be implemented via the district strategy to prevent impacts to European designated sites. There remains ample opportunity for mitigation, compensation and enhancement measures on site through careful design, following the guidance given above.

Overall, it is considered that there are no significant or in-principle ecological constraints that would preclude the residential development of the site, and there is moreover the opportunity to achieve biodiversity net gain and compliance with local and national policy.

APPENDIX D – WALKING ISOCHRONES

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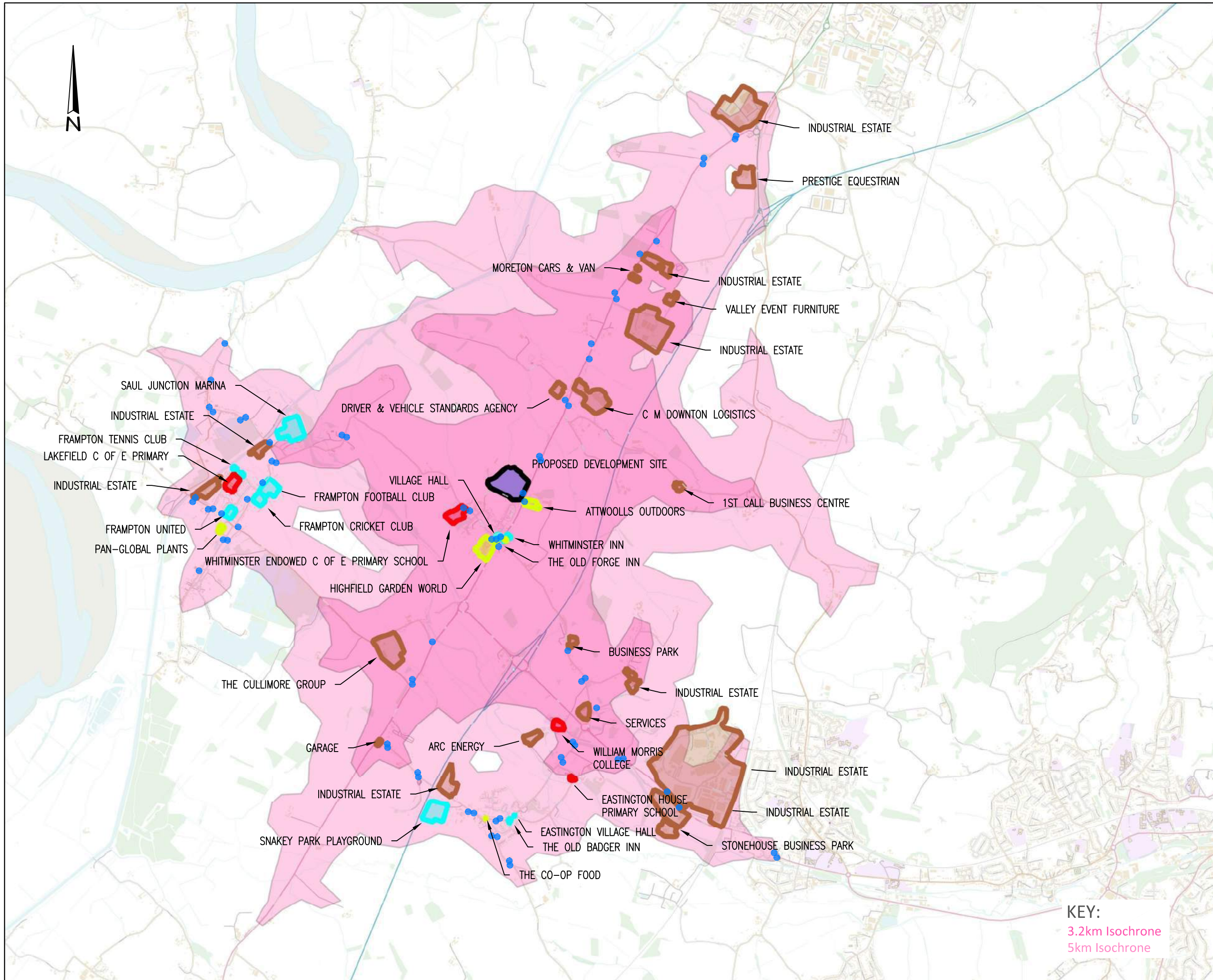


KEY:
 400m Isochrone
 800m Isochrone
 2km Isochrone

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■	RETAIL														
■	LEISURE														
■	PROPOSED DEVELOPMENT SITE														
●	BUS STOP														
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<p>clarkebond MULTIDISCIPLINARY ENGINEERING CONSULTANTS</p> <p>The Cocoa House 129 Cumberland Road Bristol BS1 6UY</p> <p>Bristol Exeter London</p>															
<p>Client REDROW HOMES</p>															
<p>Project WHITMINSTER</p>															
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KEY:
 3.2km Isochrone
 5km Isochrone

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KEY

- EDUCATION
- EMPLOYMENT
- RETAIL
- LEISURE
- PROPOSED DEVELOPMENT SITE
- BUS STOP

Rev	Detail	By	Chk	Date
*	PRELIMINARY FIRST ISSUE.

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Client
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Project
WHITMINSTER

Drawing Title
CYCLING ISOCHRONES

Drawing Status
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Project No. B05128	Discipline C	Drawing No. FIG 2
Scale NTS	Date 24.12.19	Revision *
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