

December 2020
Stroud - Additional Housing Options (L&Q)



Local Plan Review
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To Whom it May Concern,

**Stroud Local Plan Review – Additional Housing Options, October 2020
L&Q Estates – Land at Whaddon**

These representations are submitted by Savills on behalf of L&Q Estates in response to the Additional Housing Options consultation on the emerging Local Plan 2020-2040.

L&Q Estates have an interest in 23.3ha of land at Whaddon; to the south of Gloucester. The site forms part of the area identified in the Draft Plan (2019) under 'G2 – Land at Whaddon'; for approximately 2,500 dwellings, local centre, primary and secondary schools, bus interchange, safeguarded rail halt and green infrastructure. We submitted a representation to the Draft Plan in January 2020 confirming that the site is suitable, available and deliverable; and represents the most sustainable option to deliver the housing needs of Stroud.

We comment below on the plan-making process, with our comments intended to assist in ensuring that the submitted Local Plan and its evidence base is robust and sound for the purposes of paragraph 35 of the NPPF. We also provide an update in regard to the site to ensure that as the local plan moves to the Regulation 19 stage, that the evidence base appropriately reflects the up to date information on the site to demonstrate its deliverability (being available, suitable and achievable as per NPPF).

Future Housing Requirements

We support the decision to undertake a consultation on additional housing options in light of the emerging national planning policy changes and potential associated implications of 'standard method v2'.

In regard to the reference made that additional housing options may be required should any proposed allocations from the 2019 Draft Local Plan be removed, we support the Authority taking a balanced and objective approach in moving towards the Regulation 19 Plan. We do not reiterate the points raised in our submission to the Draft Plan, but note that we highlighted significant concerns over the sustainability, viability and environmental impact of the Draft Plan, in specific regard to the proposed allocation at Sharpness.

1.1 – Spatial Options – Additional Housing Land

The Sustainability Appraisal (Oct 2020) clearly identifies Option A – Intensify, as the most appropriate strategy to deliver additional housing should the need arise. This is supported, and accords with the NPPF, which indicates that development at low density should be avoided, and that developments should make optimal use of potential sites (#123).



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The consultation document and associated evidence base indicates that 35dph was assumed on average, and a variety of net:gross ratios applied. In progressing towards the Regulation 19 consultation, a robust assessment of site capacity should be undertaken to ensure that, in accordance with the NPPF, the delivery of housing on sites is optimised. This should be undertaken now to ensure that both the overall quantum of development from the allocation of sites (including the site specific policies) reflects the housing requirement, and also that the evidence base supporting the allocations is robust and reflective of the final delivery – ie the Infrastructure Delivery Plan, viability assessment, transport evidence, HRA etc. We make comment in this regard to Site G2 (Whaddon) below.

In reviewing the Sustainability Appraisal, we note that Option A results in significant positive effects associated with limiting the loss of greenfield, and limiting the impact on biodiversity, landscape character and the historic environment (#1.22). This is clearly correct, with the intensification of delivery on already identified sites resulting in a lower environmental impact than adding in new additional greenfield sites into the local plan. As such, it is therefore unclear as to why within Table A (p.9), SA7, 8 and 9 for Option A are scored similarly to other options, which the explanatory text explains would have negative effects on these elements. We assume that this is an error, and that this will be rectified within the SA accompanying the Regulation 19 consultation.

1.2 – Spatial Options – Reserve Housing Supply

The adopted Local Plan should be based upon a housing trajectory underpinned by a robust evidence base; demonstrating both the deliverability of sites, and realistic expectations in regard to likely lead-in and subsequent delivery rates on key sites. This has been a notable topic at numerous recent local plan examinations – with the timelines associated with the delivery of new or standalone developments (see #72, NPPF) a significant cause of concern for local plan inspectors, see for example Uttlesford.

Thus the housing supply within the adopted Local Plan should be based upon a sound assessment of likely delivery; including ensuring an adequate supply within the short/medium term to meet the housing needs of the area. Whilst there will clearly be a degree of variation in the housing trajectory as the sites within the local plan, this shouldn't be so significant as to require additional sites to be added to the supply within the shorter term.

The NPPF requires a supply of deliverable sites (as defined in the NPPF glossary) for the first five years (#73) of the plan period; and then requires a review of the local plan every five years (#33). As such, we do not consider it necessary to identify reserve sites at this stage; with a robust assessment of deliverability reducing the risk that housing will not be delivered as envisaged, and in the circumstances that any unforeseen circumstances lead to specific delivery issues with any particular site, its continued allocation and/or the need for additional sites, would be considered at the local plan review stage.

2.2 Potential Growth Points

Notwithstanding our comments above in respect to the most appropriate strategy pertaining to the intensification of sites, we make the following comments in regard to the two additional growth sites identified within the consultation document:

- Deliverability

We commented above in regard to the need to identify a deliverable housing trajectory – and in particular, reference paragraph 72 of the NPPF in respect to making a realistic assessment of lead in times and future delivery rates. The Draft Plan already identified two standalone new settlements at Wisloe and Sharpness, which notwithstanding general concerns around deliverability, would require significant lead-in and subsequently staggered delivery rates – with the delivery of a new community requiring substantial forward investment in local and strategic infrastructure. The identification of two potential further standalone communities raises the significant concern around likely delivery rates over the early/mid part of the local plan period.

- Affordable Housing and Viability

The overall infrastructure costs associated with new communities are very often substantial. To compound this impact often a significant proportion of the costs is incurred at the outset of the development, as opposed to being staggered over the build period. Urban extensions in contrast are typically able to use existing infrastructure and services allowing new infrastructure to be phased as part of the necessary cash flow exercises. We made comment in our representation to the viability assessment (dated 9 July 2020), raising a concern that the evidence base does not currently account for this distinction – incorrectly using the same cost assumption for infrastructure between entirely new communities with no existing services or infrastructure, as for those sites which already benefits from links to existing services and facilities, and an existing transport network.

The draft Viability Assessment (June 2020) demonstrates that the proposed developments at Sharpness are either not currently viable, or only marginally viable, and that the new settlements at Grove Road and Wisloe are marginally viable (see Table 10.4). In proceeding to Regulation 19 stage, the viability assessment will need to be updated to reflect site specific evidence, the emerging scheme details, and the Infrastructure Delivery Plan.

In considering the selection of sites for the Regulation 19 Plan, it will therefore be necessary to have updated the evidence base to support the deliverability of the sites selected, and further, to understand the implications of each individual site's viability on the delivery of affordable housing to meet the needs identified within the Local Housing Needs Assessment (Sept 2020).

- PGP1 – Land at Grove End Farm, Whitminster

Whilst the consultation document references a 2,250 unit scheme, we note that the SA makes reference to two separate schemes – with a phase 1 and phase 2 referenced in the SA (p85-86). Whilst it may be that delivery of some of the total 2,250 units could go beyond the proposed plan period, it should still be assessed as a whole within the local plan, as there are clear sustainability implications of a 1,900 unit scheme compared to a 2,250 unit scheme, as well as associated differences across the evidence base, including infrastructure requirements.

The consultation document references the potential for 13ha of employment land; however, the SA discusses 18ha of employment land. The extent of employment land should be confirmed. It will then be necessary to consider the deliverability of employment land in this location at the scale envisaged given the otherwise lack of accessibility to significant employment sites. The draft Local Plan and associated evidence base doesn't currently indicate a need for further employment land at this scale. The Draft Plan indicated a need for 48.7ha of employment; which in April 2019, was a residual requirement for 14.4ha, with the Draft Plan then identifying significantly greater quantum of employment floorspace across the plan area.

There are potential negative consequences of a planning strategy which has a significant oversupply of employment land, and in particular, where there is an intrinsic link between the delivery of employment land, and a new location for housing. The implications of delivering a new community where the associated employment opportunities do not come forward in a timely manner, or at the scale of anticipated job creation, result in significant levels of out-commuting and fundamentally compromises the sustainability of the scheme.

Whitminster is a Tier 3 settlement – appropriate for 'lesser levels of growth' (p.4, Settlement Role and Function Study Update 2018, May 2019); with no strategic services and facilities, and only some local provision. The emerging proposals for the site indicate a single local centre with employment uses of approximately 1.9ha, which whilst delivering a range of new services and facilities, would not fulfil the needs of residents of an additional 2,250 dwellings, and as such, there will continue to be a need for regular travel to higher order settlements. The ability to undertake these movements by walking, cycling and sustainable transport measures is a critical part of delivering a sustainable strategy and the ability of sites to provide deliverable, usable links should be considered as part of the site selection process. This should also feature in the SA in regard to climate change – with the NPPF specifically identifying that the location of development is one of the measures that planning can take in mitigating climate change (#150).

- PGP2 – Moreton Valence/Hardwicke

At this stage of the Local Plan, the identification of a new site based upon a number of individual SHLAA submissions, which as of yet, do not appear to have formed any agreement in terms of collaboration to deliver a cohesion and coordinated development, is a significant risk. It is also noted that there are a number of further land parcels which do not appear to have been promoted which would be required to deliver a comprehensive and coordinated new community. A number of these unpromoted parcels support land uses which would not be conducive to the delivery of neighbouring residential development, and as such, their closure, associated costs and alternative facilities may need to be addressed before the site could come forward for development.

The site scored poorly within the Transport Accessibility Assessment, and as a result also scores a double negative under SA Objective 10 (Air Quality). The ability of the site to deliver walking, cycling and public transport links to the key services and facilities located to the north must be considered as part of the site selection process – both in regard to deliverability of new infrastructure on the existing road network, and the subsequent attractiveness of these routes; recognising that the A38 forms the main route into the city, and that the site is some distance from the city centre.

The SA confirms that the site scored poorly in the Heritage Impact Appraisal (Sept 2019); indeed, the heritage assessment concludes that the site has significant heritage constraints, and that any development on the site would require a “extensive and meaningful landscape buffer” along Bristol Road, and around the two listed farms on the site – potentially reducing the area “*by as much as half*” (p.13-14). The effect of this meaning that development would be built on the eastern side of the site, but with the necessary buffer provided from the M5. Further, the site is dissected by areas of flood zone 2 and 3. The site is not covered by the Landscape Sensitivity Assessment undertaken to date, but given the site’s location as an evident elongation of Gloucester to the south, it is anticipated a fairly strong and robust southern landscape buffer would also be required. The result of these constraints raises a concern about the ability to deliver a sustainable, well-functioning and high quality scheme within this area, at the scale required to support the associated provision of new community infrastructure.

Sustainability Appraisal

We note that the SA (October 2020) confirms it doesn’t consider mitigation (#1.8) at this stage in accordance with the same approach taken in the SA (Nov 2019), and this consistency in assessment is supported. In moving to the Regulation 19 stage, we assume as per the Planning Practice Guidance and Schedule 2(7) of the SEA Regulations, the next stage of the SA will consider mitigation and enhancement opportunities associated with the policies within the Local Plan, and as such, provide a comprehensive review of the various spatial and site options.

Whaddon (G2)

Since acquiring the interest in late 2019, L&Q Estates have undertaken a range of technical assessments on the site, and have commenced working alongside the promoters of the wider G2 area, Taylor Wimpey and Newland Homes, in bringing forward proposals for the site in a coordinated and integrated manner (as per draft policy G2).

L&Q’s consultant team have progressed the baseline evidence for the site – and have completed topographical, geophysical, and arboricultural surveys, and have undertaken preliminary assessments on heritage, landscape, flood risk and drainage, highways and ecology. These are now progressing towards the detailed stage, and are supporting the masterplanning exercise.

Alongside the wider promoters of G2, L&Q Estates are progressing work on the Development Brief referenced in the draft Local Plan (p112). This is entailing the sharing of baseline evidence, and agreeing design principles to ensure a comprehensive framework masterplan is created for the entire G2 site.

In line with our comments above on the Additional Housing Land Options, prior to considering the need for additional housing allocations, it is necessary to accurately identify the scale of development which will come forward on those sites already identified within the Draft Plan. In regard to Whaddon, the emerging work by the site promoters is indicating that the area will deliver more units than the 2,500 dwellings currently identified within the current draft policy.

In this regard, we note that the site ha referenced within the draft Viability Assessment (June 2020) is incorrect, and doesn't reflect the allocation area shown within the draft plan. We also note that part of the L&Q site falls within the Gloucester City boundary – for the purposes of ensuring a robust and sound evidence base, we consider that the evidence base should cover the entire area including the parcel within Gloucester.

The masterplanning work undertaken to date indicates that the G2 site could deliver around 3,100 dwellings across the three promoters land parcel; alongside associated open space, local centre and education facilities. We will be refining the masterplan over the next few months, and will liaise with the Authority and other consultees as part of the Development Brief process.

Land at Whaddon (G2) represents the most sustainable option to deliver the housing needs of Stroud within the plan-making area. As set out in our representations to the Draft Plan, whilst we welcome the Authority's approach to working alongside Gloucester, the NPPF requires local plans to allocate the most sustainable locations for development. There is no justification for 'holding' Land at Whaddon for the potential future unmet needs for Gloucester. The Stroud Local Plan should identify the most sustainable strategy for the currently identified housing requirement. If, in the future, Gloucester City confirm an unmet housing need, then Stroud could then consider additional alternative housing sites to aid Gloucester in meeting their housing need.

Yours sincerely

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