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Our Ref: SAHOC/RN **Your Ref:**

Date: 15th December 2020

Dear Sir/Madam

Stroud Additional Housing Options Consultation.

Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following officer comments to make.

1.1 Spatial Options

Question 1:

Which strategy option(s) would you support, if additional housing land is required?

Option A – Intensify

- Focusing development to a few large sites adjacent to the main towns does facilitate the extension to existing transport services (e.g. bus and cycle) and it is often more affordable to extend existing transport infrastructure than building new;
- Urban extensions often reduce travel distances to existing services and there is the potential for a greater uptake of sustainable travel use for residents in the new developments as well as potentially in the existing settlements;
- However, this does not always result in affordable solutions being identified and existing travel demand must be managed to accommodate sufficient capacity for new development and compromise is often required;
- There may be existing capacity constraints on the highway network that will require mitigation;
- Existing bus services may be non-commercial and the scale of new growth may not justify a commercial service being viable;
- Cycle permeability may be restricted unless this is considered at the outset of planning the sites;
- Should mitigation schemes be required to address the cumulative impacts of development it is important for the transport strategy to be incorporated into local policy to aid fully inform the phasing and use of developer contributions required to offset the impacts of future growth;
- It is also worth noting that growth adjacent to Gloucester fringe development would likely require new local transport hubs and services due to the distance from the City centre. There are limited options in terms of access to rail connectivity unless new stations were considered as part of any mitigation

strategy. Adopted LTP policy PD5.1 Rail Infrastructure Improvements sets out the policy for potential new stations; and

- The distance to the core urban centres puts the new development sites at risk of being isolated on the periphery of the existing urban areas. Connectivity and permeability of movement within and between existing urban areas is key to overcoming this sense of isolation. These connections need to be identified in the immediacy and safeguarded throughout the development build, particularly if build out is multi-phase multi-developer where in the past such linkages have eroded over time.

Option B – Towns and Villages

- Distribution shares the impact of growth across the District;
- The cumulative impact will be less within the immediate vicinity of development, but existing pinch-points are likely to get worse and there would be an increase of several smaller transport pinch points across the district;
- Broader distribution is unlikely to provide sufficient growth to finance commercially viable public transport services;
- Development would likely be car reliant; and
- A likely funding gap would occur due to the dispersed development approach resulting in a failure to generate the critical mass of third party funding required to finance likely transport mitigation or public transport service extensions/frequency increases.

Option C – Additional growth point

- One Supplementary Planning Document should be produced to manage transport requirements and provide a phased delivery plan managing the pooling of contributions and funding requirements;
- Development could be designed around transport needs from the outset. This provides the opportunity to have cycle facilities and public transport services in from the start of occupation to capture the attention of early occupiers and demonstrate the benefits of using sustainable transport modes resulting in great potential for modal shift;
- A potential benefit of a new growth point is that it could be focussed around existing public transport networks and maximise the existing services, should there be sufficient capacity. However, it is more than likely that a new service would be required;
- Public transport subsidies may be required to kick-start any new service, but with the risk that they may not become financially viable until later in the build programme due to development phasing. Therefore, development may be reliant on public subsidy for longer. This is likely to be at the cost of other services as budget restrictions are ongoing.
- Transport investment will only support new development with no added benefits to other communities across the District; and
- It would potentially avoid the AONB and flood plain.

Option D – Wider dispersal

- Very unsustainable in transport terms with limited ability to collect contributions towards transport or improve existing infrastructure;
- Only those on an existing financially viable public transport service routes are likely to have access to such travel choices;

- At risk of being reliant on car if mode shift cannot be increased; and
- Community focussed schemes.

Option E – Would you support a hybrid / combination option?

GCC Officers would support a hybrid/combination approach.

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

n/a.

Question 2

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

A hybrid of urban extensions (Option A) and growth points (Option C) that maximise the availability of transport corridors (A38, M5, mainline railway) could be supported as these sites are likely to maximise the sustainable transport opportunities as well as secure contributions towards meaningful improvements to such provision.

The developments should focus on the sustainable transport options to start with. Developments that are particularly car reliant will put increased strain upon the highway network (local and strategic) and as a result may lead to expensive mitigation strategies that impact viability and site deliverability.

Focussing sites around transport hubs (railway stations, park and interchange hubs) both new and existing which are served by high frequency services (20 minute frequency throughout the day) will allow good opportunity to provide sustainable development. Sites centred on the railway should consider linkages to local employment centres located on the Bristol to Birmingham mainline, allowing access to Cheltenham, Gloucester and the West of England. Providing or enhancing non-car based connectivity and permeability through the sites and to transport hubs should be prioritised.

1.2 Spatial options: a reserve housing supply.

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?

Yes

No – Start immediate review.

No – Other option.

GCC Officers support the approach to identifying reserve site(s) subject to those sites themselves being subject to acceptable transport assessment/modelling outputs.

Question 4

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

Note: Option A cannot be used.

Option A – Intensify

Option B – Towns and Villages

Option C – Additional growth point

Option D – Wider dispersal

Option C – A new growth point around sustainable transport networks, such as rail, could provide a development large enough to accommodate the additional housing require, whilst putting sustainable development at the fore-front. Public transport and active travel connectivity could be prioritised from the outset.

Option E – Would you support a hybrid / combination option?

Yes

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

N/A

Question 5

If you answered yes to Q4e above, please explain which of the spatial options (B-D) you would like to see combined in a hybrid system and why?

A mix of B and C but with the caveat for B to only focus on settlements which has services which can be accessed as part of a walking neighbourhood, and C must of be sufficient scale to maintain high levels of internalisation.

Question 6

(If a site in the local plan does not come forward for development as expected, then a reserve(s) site may be required. However, the ‘trigger’ for allowing a reserve site or sites to receive planning permission needs to be clearly set out in the plan, to avoid doubt or uncertainty. There could be a variety of triggers/reasons for bringing a reserve site into play.)

What should trigger a reserve site or sites coming forward?

- **A delay in an allocated Local Plan site receiving planning permission (yes/no).**
- **Failure to deliver housing at building rates set out in the Local Plan (yes/no).**
- **Another trigger.**
-

Perhaps a combination of the two options above, however authorities should be mindful of speculative development coming forward or allocated sites that are delayed but later approved through appeal still being delivered after the reserve site has also come forward and been approved. This may add additional strain upon transport networks.

A delay in an allocated Local Plan site receiving planning permission doesn't necessarily mean it is an inappropriate site, just that an inappropriate application has been made – e.g objection to the Flood Risk Assessment by the Lead Local Flood Authority.

2.1 New Housing sites.

Question 7

Do you support or object to the development of sites identified?

Hook Street Farm, Berkeley.

No, Berkeley is a community that does not provide key services and destinations such as secondary education, employment or larger retail/leisure opportunities. Future residents would be car reliant to access these services resulting in cumulative congestion impact at existing larger settlements.

The red line of the Hook Street development includes a significant area in Flood Zone (FZ) 3. By the time attenuation basins are located it doesn't leave a lot of space for houses. At first sight it looks similar to the development at Cannonbury Street but the proportion of land there in FZ 3 was much smaller and this allocation for 45 houses would have a high risk of failure. Unlike the Cannonbury Street site this area could get isolated in a flood with all access roads under water.

The county Historic Environment Record shows Medieval and/or Post Medieval ridge and furrow within the site. A prehistoric ditch has been recorded during evaluation immediately north of the site and it is situated approx. 90m from the core of medieval Berkeley. A Post Medieval and 20th century brickworks, and the fragmented earthworks remains of Medieval to Post Medieval sea defences lie to the south of the site.

Archaeological investigation has not been carried out and therefore there remains potential for archaeological remains to be present within the site, the presence and significance of which cannot be established until archaeological evaluation is carried out.

Bevans Hill Farm, Berkeley.

No, Berkeley is a community that does not provide key services and destinations such as secondary education, employment or larger retail/leisure opportunities. Future residents would be car reliant to access these services resulting in cumulative congestion impact at existing larger settlements.

15 houses here has a greater chance of success than 45 at Hook Street Farm but the area will be cut off in floods. We would suggest it would be safer to steer residential development away from these two sites from a flood risk perspective. The county Historic Environment Record shows Medieval and/or Post Medieval ridge and furrow within the site. A prehistoric ditch has been recorded during evaluation immediately north of the site and it is situated approx. 230m from the core of Medieval Berkeley. A Post Medieval and 20th century brickworks, and the fragmented earthworks remains of Medieval to Post Medieval sea defences lie to the south of the site.

Archaeological investigation has not been carried out and therefore there remains potential for archaeological remains to be present within the site, the presence and significance of which cannot be established until archaeological evaluation is carried out.

Land at Sellars Road, Hardwicke.

Support subject to access being formed off Bridge Keepers Way only.

No objection to this from a flood risk management perspective. The other Sellars Bridge development that surrounds this site has worked and shown that surface water can be managed with good development.

The county Historic Environment Record shows Medieval and/or Post Medieval ridge and furrow within the site. No significant heritage assets are recorded at present to preclude proposed development. An archaeological excavation was carried out in 2012-13 adjacent to the proposed development site which recorded archaeological remains dating to the Roman period consisting of enclosures, ponds, postholes, a pit and boundary/drainage ditches, a possible late Roman or early Medieval burial as well as a Bronze Age pit, postholes and an assemblage of prehistoric pottery.

Archaeological investigation has not been carried out within the proposed development site and therefore there remains potential for archaeological remains to be present within the site, the presence and significance of which cannot be established until archaeological evaluation is carried out.

Beeches Green Health Centre.

Support, this is a brown field site with an existing trip profile.

No objection with regards to flooding.

The county Historic Environment Record shows no known heritage assets recorded within the proposed development site. As the site has been previously developed the risk of encountering significant archaeological remains is low however due to a Roman occupation site recorded approx. 100m to the north there is some potential for archaeological remains to be present within the site.

South of Hyde Lane, Whitminster.

No, Whitminster does not have sufficient services to reduce the need for short distance trips, and despite its scale it will still result in car dependency.

No objection with regards to flooding.

The county Historic Environment Record shows the remains of Medieval and/or Post Medieval ridge and furrow within the proposed development site. The site lies close to the Roman road between Gloucester and Bristol and a number of features have been recorded from aerial photography in the nearby vicinity.

Archaeological investigation has not been carried out and therefore there remains potential for archaeological remains to be present within the site, the presence and significance of which cannot be established until archaeological evaluation is carried out.

Question 8

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

N/A

2.2 Potential Growth Points.

Question 9

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

PGP1 Land at Grove End Farm, Whitminster.

PGP 1 has good scope to connect the development to sustainable transport options utilising the A38 corridor. The site is also within close proximity to the Stroudwater navigation canal restoration which will offer potential to provide cycle accessibility to Stroud/Stonehouse and also Gloucester along the G&S Canal once the two are connected. The development would still require users to access the SRN and this is most likely to be at J13 so the highway impact acceptability would be subject to traffic modelling.

The site is remote from the railway stations and would require travel to Gloucester or Cam & Dursley for travel to Bristol. This does lend opportunity for a new node on the mainline that this site can connect to although the M5 and the severance it causes would need to be addressed. These issues could be overcome with careful master planning to ensure the development is well connected to bus and rail networks as well as ensuring good permeability to existing active travel corridors.

The benefit of accessing these transport corridors is that they exist with services already, the development could therefore help ensure long term viability and/or contribute towards additional services/increased service frequency. The careful master planning will ensure that these routes are attractive travel modes of residents from the outset of occupation.

No objection with regards to flooding.

The county Historic Environment Record shows the remains of Medieval and/or Post Medieval ridge and furrow within the proposed development site. The site lies close to the Roman road between Gloucester and Bristol and a number of features have been recorded from aerial photography within and within close proximity to the site. Archaeological geophysical survey has been carried out which has revealed a number of sites of potential archaeological interest. Trial trench evaluation is currently underway to ascertain the significance of archaeological remains within the site.

PGP2 – Moreton Valence

PGP2 is separated from Gloucester and Stroud and is located adjacent to the M5 and A38. It has similar issues and opportunities to that of Grove End Farm. Given its more northerly location it may place added pressure on M5 J12. The relative isolation of this proposal will result in reliance on the private car which is unlikely to be offset through investment in sustainable travel. Highway impacts would need to be accepted subject to modelling. Parcels HAR008 and HAR009 do not connect to the boundary of the other land available and these will rely on all trips using the A38 in some form to access local services. The site has the potential to provide dedicated walking/cycling routes to existing bus stops on the A38 served by high/very high frequency bus services.

This site could also accommodate interchange hubs in the vicinity of M5 J12. PGP 2 has scope to connect to the G&S canal for access to Gloucester or the Stroud Valley therefore active travel connectivity from within the development to external areas is important. However, significant investment would be needed in active travel to access more local employment sites and the centre of Gloucester falls outside cycling distances.

The linear extension of the development compounds these issues. Issues of rail connectivity remain, although dedicated connections to a new node on the mainline could be provided allowing access by foot, cycle or PT. This would require M5 severance issues to be overcome, although a dedicated cycle link between Stonehouse and Gloucester can easily be connected to and from this site. GCC's LTP has recognised this link as a scheme priority and it also features as part of GCC's strategic cycle desire lines. Developer contributions could help deliver this sustainable infrastructure.

Each individual parcel should be linked via sustainable modes with perhaps a dedicated link over the M5 from parcel HAR007 to PS43 to overcome M5 severance and remove the need for users to travel north to the B4008 to then travel south again. Although located close to the existing built environment of Gloucester, it will still be some distance from Gloucester's core centre.

To avoid peripheral isolation that is sometimes found with other Gloucester fringe sites, the development must add character that encourages ease of movements with the existing areas and/or provide a centre of its own that provides the necessary services that reduce the need for wider travel.

There is some FZ3 in HAR015/06 but no reason why development there should not be managed successfully from a flood perspective.

The county Historic Environment Record shows the remains of Medieval and/or Post Medieval ridge and furrow within the proposed development site. The site lies close to the Roman road between Gloucester and Bristol and a number of features have been recorded from aerial photography within the site.

Archaeological investigation has not been carried out and therefore there remains potential for archaeological remains to be present within the site, the presence and significance of which cannot be established until archaeological evaluation is carried out.

PGP1 & PGP2: Both of these potential sites can maximise the opportunity to provide a green infrastructure corridor between the A38/M5 corridors which creates an active space in terms of modes and land uses. The corridor should consider wider connectivity that encourages movements between local centres, i.e. towards Stonehouse or north towards Huntsgrove, Kingsway and Quedgeley. This will help reduce potential risk of creating dormitory settlements dominated by the car.

More development could mean more transport sustainability, but only with clear intentions, very good transport modelling and land uses and development that favour non-car based trips. The transport modelling can be useful in establishing where precisely there is potential for transport mode shift and thus development can be focussed around that identified area.

Question 10

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

GCC Transport Planning Officers do not have a specific site in mind; however a new settlement node focussed around a new station on the Birmingham – Bristol mainline should be considered. The LTP has ambitions for a new station south of Gloucester and developing a new settlement around it will help to ensure its viability while making sustainability the main focus. Depending on the location of a new station, the scale of growth could be substantial which would help SDC meet housing targets whilst ensuring that the new station node has the necessary critical mass to make it a viable proposition.

A new railway station could be a sustainable multi-mode transport hub with parking, walking and cycling routes to and from the residential and employment land parcels and dedicated bus/coach infrastructure measures to ensure access from both the development site itself and the wider surrounding areas.

Substantial development around a new rail node may also help encourage service frequency improvements on the rail corridor, an objective of the LTP rail strategy PD5. Large scale development proposals may support Gloucestershire and regional bodies such as the Western Gateway in lobbying government for such service improvements. Developer contributions can also be sought to help ensure the viability of the service. The Gloucestershire Rail Investment Strategy (GRIS) demonstrates the benefits, in terms of GVA, that a new 'parkway' station can have in Gloucestershire. Emerging LTP rail policy PD5 and the GRIS identify the Birmingham – Bristol mainline as the most economically important corridor in the county. Currently it only equates to 1% of total transport movements, so increasing this value will deliver economic growth but also reduce the pressures upon our road based transport network, which is at risk of becoming a blocker to growth.

The M5 can provide further regional travel, with good access for the efficient delivery of goods and services into and out of the development, however, capacity constraints at junctions need to be considered. Maximising the rail corridor and actively encouraging modal shift will reduce reliance upon the M5 and can reduce single car occupancy demand upon the M5, improving resilience and reducing journey times.

It is important that any new development allocation supports new or existing public transport services as well as walking and cycle connectivity. The A38 corridor has the potential to provide sustainable bus or coach transport connectivity north to Gloucester and South to Bristol. Dedicated cycle links and use of quiet streets will provide legible and direct sustainable corridors utilising the shortest and quickest routes to key services and facilities away from traffic. These routes should also expand beyond the boundaries of development and integrate seamlessly with existing facilities to enable wider connectivity. The wider walking and cycling links could fall within the desire lines identified on the Gloucestershire Countywide cycle desire lines map (See Figure PD2 (C) of the Emerging LTP cycle policy). Master-planning at the earliest opportunity is vital to the success of sustainable development and to ensure current barriers to movement such as the M5 and railway are overcome.

Digital connectivity is a key component of sustainable development, particularly in post-Covid19 times due to a potential increase in home working. The long term impacts on transport are not yet fully understood, however, it is possible that homeworking will enable people to live in locations further away from their place of work, resulting in fewer, longer distance travel – a pattern supportive of regional rail services. It may also result in people living and travelling locally to nearby facilities and they should be able to do so via walking and cycling.

Question 11

Do you have any comments to make about the SALA that accompanied this consultation document?

The use of tools such as the Transport for New Homes sustainability scoring tool could offer early insight into the suitability of some proposals.

General Comment

We agree with the Sustainability Appraisal that all of the options are likely to have adverse effects upon biodiversity without mitigation and compensation measures. The additional housing options will challenge both developers and the LPA in achieving an overall biodiversity net gain of 10% or more (a proposed new mandatory planning requirements being introduced by the government).

If you would like to discuss any of the points raised above please do not hesitate to contact me.

Yours faithfully



Senior Planning Officer