

Statement of Common Ground between (i) Stroud District Council (SDC)

and (ii) the Promoters (Blackbox Planning for Taylor Wimpey, Savills for L&Q Estates and Ridge LLP for Newland Homes)

Local Plan Site Name and Policy Reference: G2 Land at Whaddon
Date: August 2022

This Statement of Common Ground has been prepared by the parties to establish the main areas of agreement between Council and the site promoter and to identify any areas where further work is required for completion to prove soundness and deliverability to the Inspector.

1. Description of the site	<p>The Whaddon site physically adjoins the urban edge of Gloucester City to the north and west. Gloucester City is the nearest higher order settlement, and it provides both strategic and local facilities. The site is bounded by the Bristol-Birmingham main line railway to the west, and M5 and Naas Lane to the south. There are two listed buildings within Whaddon, northeast of the site; and to the south, beyond the M5 at Brookthorpe. A watercourse Daniels Brook bisects the site south to north.</p>
2. Local Plan context	<p>The adopted Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) (2017) stated that Gloucester City has a good supply of housing land to meet its requirements to at least 2028/9, but the JCS was adopted with unidentified need for Gloucester City and hence the requirement for immediate review to explore the potential for additional sites to meet Gloucester's needs in the longer term. The JCS Inspector identified Whaddon as a sustainable location for the City's growth and recommended joint working with Stroud District with a view to the site's allocation to help meet the future needs of the City. As a result, the District Council has been working with neighbouring authorities including Gloucester City Council to identify potential sustainable locations to meet longer term housing needs. In 2019, The Assessment of Strategic Development Opportunities in Parts of Gloucestershire: Interim Report assessed 29 locations adjacent to Gloucester and identified seven locations as having the highest current degree of accessibility to Gloucester. Of the three locations identified within Stroud District, land at Whaddon offers the most potential to help meet the future housing needs of Gloucester.</p>
3. Relevant promoters representations	<p>Representation (936) Blackbox Planning for Taylor Wimpey UK Limited including additional reports. Taylor Wimpey control the majority of the G2 site with frontage onto Stroud Road.</p> <p>Representation (913) Savills for L&Q Estates including additional reports. L&Q Estates control the northern part of the site including frontage Grange Road.</p> <p>Representation (910) Ridge and Partners LLP for Newland Homes. Newland Homes control a smaller part of the site with frontage onto Grange Road and Stroud Road.</p>

	Promoters representations are relating to attached plan Appendix 1.
4. Main areas of agreement.	<p>The Council is not agreeing to any changes to the SDLP as a result of this Statement of Common Ground. It is only to set out the broad principles where the parties agree and disagree.</p> <p>Housing: At least 3,000 dwellings, including 30% affordable housing, to address tenure, type and size of dwellings needed within the Gloucester City area and community uses. The three development/promoters controlling the G2 allocation site are working together to produce a comprehensive masterplanning approach for the site.</p> <p>Infrastructure: A site for a new surgery or contribution towards the extension of existing health facilities to support the development.</p> <p>Transport/Access: G2 where footpath level crossings are nearby, we agree to recommend adding the following clause to the site allocation policy:</p> <p>“Safety improvements to, or the closure of, footpath level crossings where development may result in a material increase in usage, in consultation with Network Rail.”</p> <p>The parties agree that this does not necessitate a new pedestrian/cycle bridge crossing over the railway but options to enhance and improve existing connectivity and safety providing alternative routes to the level crossing should be explored.</p> <p>Environmental: For strategic site allocation G2 Land at Whaddon , a criterion is agreed that states:</p> <p>“An initial Mineral Resource Assessment (MRA) to determine the significance of the underlying mineral resources present within the designated MSA and any mitigation measures necessary to avoid its sterilisation or strategy for its prior extraction.” The Council acknowledges that the site promoters have produced an initial Mineral Resource Assessment (MRA) to determine the significance of the underlying mineral resources present within the designated MSA. The County Council will assess the MRA report findings and any mitigation measures necessary.</p> <p>Environmental: Accessible natural green space along the Daniels Brook providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards.</p>

Transport/Access: A layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking and cycle routes that are shorter in distance than the highway network, in accordance with Manual for Streets.

Transport/Access: High quality and accessible walking and cycling routes within the site including the retention and diversion of existing footpaths as necessary, the provision of improving existing connections to Waterwells Business Park and local facilities within Tuffley including appropriate infrastructure and crossing facilities and contributions towards the enhancement of off-site walking and cycling routes to key destinations including to Gloucester city centre.

Transport/Access: Contributions and support to sustainable transport and mitigation measures on the A4173 sustainable transport corridor.

Design: To plan and deliver a layout, density, built form and character of development which respects the character and appearance of the local area and responds positively to the environmental challenges and opportunities presented by the site.

Infrastructure: A local centre, incorporating employment, local retail and community uses to meet the needs of the development.

Environmental: Structural high quality landscaping buffer along the western and southern and eastern boundaries incorporating existing and new native hedgerows and trees and linking with existing green infrastructure supported.

Environmental: The acceptable management and disposal of surface water, including sustainable drainage systems (SuDS). Enhancement of the Daniels Brook corridor including re-profiling and removing walled channel and culvert sections where possible.

Environmental: A layout, density, built form and character which reflects any sensitivities identified by landscape and heritage assessment at the application stage.

Transport/Access: Public transport permeability through the site, including a bus only link to Naas Lane at the southern end of the site, and provision of a bus only link between the main body of the site and the northern proportion fronting Grange Road/Stroud Road. Provision of bus stops and shelters at appropriate locations within the development to access existing diverted and new bus services and contributions to enhance bus service frequencies to key destinations including Gloucester, Stroud and Stonehouse.

	<p>Transport/Access: A movement strategy that provides for a modal filter onto Naas Lane, promoting bus, cycle and pedestrian movements towards Waterwells Business Park and local destinations to the west.</p> <p>Transport/Access: Behavioural change measures to encourage sustainable travel by way of new and improved infrastructure and implementation of a Travel Plan.</p> <p>Transport/Access: Associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location, precise details for which will be agreed with the highway authorities.</p> <p>Transport/Access: Electric vehicle charging points in accordance with building regulations.</p> <p>Infrastructure: Appropriate provision of primary school/s within the masterplan and through S.106 planning obligations at the planning application stage to be negotiated with Gloucestershire County Council taking into account the latest evidence regarding local school capacities and public yield multipliers for S.106 obligations. All parties are aware the GCC education are currently reviewing pupil yield data county wide and school capacity assessments via monitoring before providing up to date confirmation of requirements and developer obligations. Await up to date confirmation of exact requirements from GCC education. Consistent with the policy objective to ensure appropriate levels of on-site school provision for primary and secondary is delivered.</p> <p>Infrastructure: Land safeguarded for the provision of a new secondary school in response to the forecast need for a new secondary school in south Gloucester and/or appropriate levels of S.106 contributions towards secondary education provision. All parties are aware the GCC education are currently reviewing pupil yield data county wide and school capacity assessments via monitoring before providing up to date confirmation of requirements and developer obligations. Await up to date confirmation of exact requirements from GCC education. Consistent with the policy objective to ensure appropriate levels of on-site school provision for primary and secondary is delivered.</p> <p>Other matters: Phasing arrangements to ensure that community infrastructure and non-residential elements of the masterplan are delivered in a timely manner.</p>
5. Main areas of disagreement / dispute/areas requiring further work.	<p>Principle of Development: The promoters considers that the site should be allocated for development through the Local Plan and not 'safeguarded' to meet the future needs of Gloucester City as determined through the JCS review. The promoters put forward this case on the basis that:</p>

- The JCS was adopted without identifying the full needs of the City and therefore there is an existing shortfall to be addressed;
- The projected needs of the City for the JCS review cannot be met without Whaddon in a manner consistent with the national policy objective to maintain green belt alongside floodzone which is the other main constraining factor limiting the direction for growth at Gloucester;
- The JCS authorities have already clearly indicated the need for Whaddon to come forward for the housing needs of the City in their representations to date and the JCS review examination will provide little substance to alter this as reasonable alternatives for the City are so limited; and
- The JCS Inspector provided a clear direction for the authorities to work jointly in respect of bringing forward the Whaddon site as a suitable and sustainable growth point for the City.
- Notwithstanding the fact that the Whaddon site is well placed to meet the needs of Gloucester, it is also a more suitable, sustainable and deliverable location for development than other strategic allocations in the submitted draft plan. On that basis it should be preferred for 'allocation' over other locations and should not be 'safeguarded'.

Housing: The promoters object to the requirement to accommodate 8 plots for travelling showpeople to meet unmet needs arising from the Gloucester City Area owing to the evidence base, testing of alternative sites and a methodology for site selection process.

Infrastructure: The promoters object to the indicative site plan which should indicate three points of access along the Stroud Road. A northerly access point which will serve the new model interchange is omitted, contrary to previous submissions and the emerging masterplan for the site.

Environmental: The promoters state that mitigation for Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC sites will be through recreational space provision. Therefore, the promoter objection is that the policy should allow a degree of flexibility on natural green space and net gain to local biodiversity and public open space aspects. An overprovision of certain types of green space may be preferable for environment/habitat creation resulting in modest under-provision of other types of green space. As a matter of principle, the mitigation of impacts is supported.

Infrastructure: The promoters support the principle of education provision on site, but comment that the policy requirement for a 3FE primary school and a 2FE primary school (both incorporating

early years' provision) and contributions towards the provision of a 3.5FE secondary school (+ 6 form) on a 8.7 ha site is not justified and does not reflect actual need. The promoters object to the requirements without clarification on the school provision with an update to be provided from Gloucestershire County Council to reflect its updated pupil yield calculations and capacity assessments.

Transport/Access: Whilst the promoters agree with a primary vehicular access from the A4173 and additional vehicular access from Grange Road, with necessary improvements to the existing highway network, the objection remains that the plan should indicate three points of access along the Stroud Road. A northerly access point which will serve the new model interchange is omitted, contrary to previous submissions and the emerging masterplan for the site. It is suggested that the wording '**and others as agreed through the planning application process**' should be added to provide appropriate flexibility for the development management stage.

Environmental: The promoters disagree with the term 'sensitive landscape' used as the site is enclosed by the M5 and does not adjoin the AONB. The promoters wish for clarification on the sensitivity aspects.

Other matters: The promoters object to the description that it is a 'safeguarded' site. The site should be allocated now and not tied to the future needs of Gloucester City or the JCS review. The fall-back position for the Whaddon site as set out in the Reg 18 Draft Plan should be reinstated, whereby should the JCS authorities not require Whaddon, the site shall be considered as an option for meeting the district's own needs. The words 'if required' should be deleted from 3.4.5 guiding principle 3 (page 140) and paragraph 3.4.23 (page 156)

Other matters: The promoter objects to the map presented on page 160 of the Plan as inaccurate and exaggerates the extend of nondevelopable land around the Daniels Brook Corridor which is misleading and unevidenced.

Other matters: The promoter objects to Stroud's IDP (which accompanied the consultation) as it needs to reflect updated requirements for county education/other infrastructure following technical analysis and testing.

Other matters: The promoter objects to employment use aspects unless the Plan clarifies that the employment is ancillary to local centre/community core and not a large business park.

Other matters: The promoter requests the boundary to be revised (and the evidence base, notably the Viability Assessment refined) to ensure that it reflects the development proposed.

6. The promoters' anticipated start and build-out rates.

Year:	No. of new dwellings
April 2025- March 2026	175
April 2026 – March 2027	175
Total	350

I attach the table for completion below:

Year	No. of new dwellings
April 2022 - March 2023	0
April 2023 - March 2024	0
April 2024 - March 2025	80
April 2025 - March 2026	200
April 2026 - March 2027	200
April 2027 - March 2028	200
April 2028 - March 2029	200
April 2029 - March 2030	200
April 2030 - March 2031	200
April 2031 - March 2032	200
April 2032 - March 2033	200
April 2033 - March 2034	200
April 2034 - March 2035	200
April 2035 – March 2036	200

	April 2036 – March 2037	200
	April 2037 – March 2038	200
	April 2038 – March 2039	200
	April 2039 – March 2040	120
	April 2040 – March 2041	
	Not going to be built	
	*Total	

7. Promoters' Deliverability/Viability Statement

The promoters have submitted representations throughout the local plan preparation process including to the plans associated evidence base and viability assessment. The representations have demonstrated that there are no insurmountable constraints to development or delivery of the G2 strategic site and this is further supported by the technical evidence base of the local plan.

Taylor Wimpey controls the majority of the site and are national housebuilders who intend to bring forward delivery of the site expediently in tandem with the progression of the Stroud Local Plan through examination. It is intended that an outline planning application will be submitted in 2023, with infrastructure and Phase 1 RMs thereafter. The delivery trajectory is based with the intention of having 3 sales outlets operating across the site at any one time. Taylor Wimpey intends to be delivering homes at Whaddon from July 2024 pending the Local Plan moving forward to adoption.

L&Q Estates control the majority stake of the northern part of the site and function as a land promoter. As the local plan progresses towards adoption, L&Q Estates intend to submit an outline application with a delivery partner identified thereafter.

Newland Homes control the minority share of the strategic site with frontage onto Grange Road. They are a sub-regional house builder and intend to submit a detailed planning application as the local plan examination reaches an advanced stage.

Regular dialogue between the developer consortium has taken place to inform the masterplanning approach which in turn will assist delivery. All baseline environmental data has been gathered to both support technical submissions including EIA for planning

	<p>applications in due course and to inform the masterplan as technically robust.</p> <p>Proposals in relation to flood risk management and enhancement of the Daniel's Brook corridor have been subject to much pre-application dialogue with the Environment Agency to ensure comprehensive and acceptable proposals emerge. The scope of detailed traffic modelling and highway mitigation measures have also been subject to proactive dialogue with the county highway authority. The Whaddon site has also been identified by the Department for Education as the only available and suitable site for a new secondary school at South Gloucester.</p> <p>As such, critical technical matters have been advanced significantly at the pre-application stage to give confidence to the development proposals for the site coming forward.</p>
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Signed on behalf of the Promoters – Black Box Planning for Taylor Wimpey Strategic Land	Signed on behalf of Stroud District Council
Redacted Signature	Mark Russell (Electronically)
Date: 30-03-23	Date: 20.06.23
Name: Conor Flanagan Position: Director	Name: Mark Russell Position: Planning Strategy Manager
Signed on behalf of the Promoters – Savills for L&Q Estates	Signed on behalf of Stroud District Council
Date: 30-03-23	Date:
Name: Nick Matthews Position: Director	Name: Position:
Redacted Signature	
Signed on behalf of the Promoters – Ridge LLP for Newland Homes	Signed on behalf of Stroud District Council
Date: 30-03-23	Date:
Name: Giles Brockbank Position: Partner	Name: Position: