

# Draft Local Plan - Additional housing options consultation

## 1. Introduction

The following survey relates to the *Stroud District Local Plan Review: Additional housing options October 2020* which can be viewed at https://www.stroud.gov.uk/localplanreview (https://www.stroud.gov.uk/localplanreview)

In August 2020, the Government published a consultation document which proposed changes to the way the Government calculates minimum housing requirement for each local authority area in the country. This revised standard method has proposed increasing the requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 homes per annum, to 786 homes per annum. If this new revised method is confirmed, a revised Draft Local Plan may have to identify further land within the District for housing.

The Council is therefore launching a narrow focused eight-week public consultation from 21 October 2020 to 16 December 2020 on additional housing options and sites, which could be brought into the emerging Local Plan, if required. We would also like your views on whether and how a reserve housing supply should be identified, in case any of the Local Plan's site allocations were to fall short on delivering the numbers of homes expected.

#### Making comments

Whilst we encourage responses to this consultation, please do not repeat comments that you may have made previously on other policies or sites which formed part of the Draft Local Plan, but which do not form part of this focused consultation. These previous comments will be taken into consideration and a report of consultation will accompany the final Draft Local Plan when it is considered in 2021.

You do not need to fill in every question. Once finished, please go to the last page to submit your response. There is an opportunity to print your response at the end of the survey so that you can

keep a copy for yourself. If you would like to save your response and return to complete it later then please press save and continue later at the bottom of the page.

The consultation will close on Wednesday 16 December 2020

#### **Data Protection**

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## 2. Your details

Name *
Your company or organisation
PEGASUS GROUP
Your email address *
Client's name (if applicable)
Client's company or organisation (if applicable)
ROBERT HITCHINS LTD
Which area/cluster of parishes do you identify yourself with (i.e. live, work, visit)? *
☐ Berkeley (Parishes of Berkeley, Ham & Stone, Alkington, Hamfallow, Hinton, Slimbridge)
☐ Cam & Dursley (Parishes of Dursley, Cam, Coaley, Stinchcombe, Uley, Nympsfield, Owlpen)

	Cotswold (Parishes of Painswick, Bisley-with-Lypiatt, Miserden, Cranham. Pitchcombe)
	Gloucester Fringe (Parishes of Hardwicke, Haresfield, Harescombe, Brookthorpe-with-Whaddon, Upton St Leonards)
	Severn Vale (Parishes of Arlingham, Fretherne-with-Saul, Frampton on Severn, Whitminster, Moreton Valence, Longney. Elmore)
	Stonehouse (Parishes of Stonehouse, Standish, Eastington, Frocester, Leonard Stanley, Kings Stanley)
	Stroud Valleys (Parishes of Stroud, Whiteshill & Ruscombe, Randwick, Cainscross, Rodborough, Brimscombe & Thrupp, Chalford, Woodchester, Minchinhampton, Horsley, Nailsworth)
	Wotton (Parishes of Wotton-under-Edge, North Nibley, Kingswood, Alderley, Hillesley & Tresham)
$\boxtimes$	Outside the District
ા	. Spatial Options: additional housing land
Qı	u.1a Would you support or object to Option A - "Intensify", if additional housing land is quired?
Qı	u.1a Would you support or object to Option A - "Intensify", if additional housing land is
Qı re	u.1a Would you support or object to Option A - "Intensify", if additional housing land is quired?  Support
Qu re	u.1a Would you support or object to Option A - "Intensify", if additional housing land is quired?  Support Object
Qu re	u.1a Would you support or object to Option A - "Intensify", if additional housing land is quired?  Support Object ease explain your answer
Qu re	J.1a Would you support or object to Option A - "Intensify", if additional housing land is quired?  Support Object ease explain your answer See response to Question 1e below  J.1b Would you support or object to Option B - "Towns and villages", if additional housing land
Qu re	2.1a Would you support or object to Option A - "Intensify", if additional housing land is quired?    Support     Object     Description     Support     Object     Support     Object     Support     Object     Object

See	
	response to Question 1e below
Qu.1c and is	Would you support or object to Option C - "Additional growth point", if additional housing s required?
	Support
	Object
'leas	e explain your answer
See	response to Question 1e below
Qu.1d equir	Would you support or object to Option D - "Wider dispersal", if additional housing land is ed?
equir	Would you support or object to Option D - "Wider dispersal", if additional housing land is ed?  Support
equir	ed?
equir	ed? Support
equir  Please A w	ed? Support Object
equir  Please A w	Support Object e explain your answer der dispersal option would not be consistent with the objectives of national policy as set out
Please A win th	Support Object e explain your answer der dispersal option would not be consistent with the objectives of national policy as set out
Please A win th	Support Object e explain your answer der dispersal option would not be consistent with the objectives of national policy as set out the NPPF

Pegasus on behalf of Robert Hitchins Limited welcome the consultation on the Additional Housing Options.

## A hybrid option is supported for a number of reasons:

- The Government's objective is to significantly boost the supply of homes, in order to achieve this it is important that a sufficient amount and variety of land can come forward where it is needed, that meets the needs of groups with specific housing requirements and that land with permission is developed without delay.
- The most effective way of achieving delivery is to have a range and choice of sites.
- The Plan will be able to meet the size, type and tenure of housing needed for different groups in the community.
- It is noted that the Council have had to prepare a Delivery Action Plan (August 2019) to respond to the Housing Delivery Test (HDT) for Stroud published in February 2019 (this reflects the HDT measurement of 94% housing completions for the three year period 01 April 2015 to 31<sup>st</sup> March 2018. The Action Plan was required to reduce the risk of future under delivery. The under delivery reflected the lower delivery rates in the two year period 2015-2017 are attributable to delays to programmed delivery at major development sites at Littlecombe, Dursley and Hunts Grove, Hardwicke, due to infrastructure requirements, and detailed planning permission outstanding at Local Plan allocation sites at SA2: Land west of Stonehouse and SA3: NE Cam. Land West of Stonehouse {S.14/0810/OUT} was a Local Plan allocation promoted by RHL through the LP, a planning application was submitted and validated on 4<sup>th</sup> April 2014 and a decision was issues on 14<sup>th</sup> April 2016). It is noted that the Action Plan in Table 2 for the three years 2016 -2019 shows a marked increase above that required for the new three year period. Whilst the housing land supply measured against the adopted district housing requirement is well in excess of 5 years (8.95yrs Stroud Housing Land Supply October 2020) as the Local Plan is now more than 5yrs old, (i.e. since it was adopted in November 2015) the district housing land supply is measured against the District's housing need assessed using the current standard method. Based on the Local Housing Need Standard Method there is a 6.56 years supply. However, due to the COVID 19 pandemic the Council have not been able to undertake a full and comprehensive reassessment of the housing land supply, consequently the report provides an indication of how the land supply position may be changing in particular in relation to the standard method for assessing local housing need.
- As the revised standard method increases the housing requirement, this underlines the importance of including a range and choice of sites in the Plan to ensure delivery is met.
- It is noted that the SA accompanying the consultation on Additional Housing Sites Options recommends that the Council continues with a hybrid approach to the strategy.

Qu.1f Can you suggest another strategy / spatial option for the identification of additional housing land?		
	Yes	
$\boxtimes$	No	
Please	e describe it	
Qu. 2 would	If you answered yes to Q1e above, please select which of the spatial options (A-D) you like to see combined in a hybrid strategy?	
$\boxtimes$	Option A - Intensify	
$\boxtimes$	Option B – Towns and villages	
$\boxtimes$	Option C – Additional growth point	
	Option D – Wider dispersal	

#### Please explain why

A hybrid strategy enabling a wide choice and range of size of sites to meet housing needs can be met by a combination of approach comprises, there is some additional capacity at the towns and villages, for example within the Severn Vale Cluster, Whitminster is a Tier 3a settlement located adjacent to the M5 and on the A38 with sustainable transport links to Gloucester, Stonehouse and Stroud. Whitminster is well placed to take development that meets more than local needs. Land West of School Lane (PS46) is a proposed allocation in the Draft Plan 2019 for 30 dwellings, however, as referred to in our representations to the Draft Plan in January 2020, this site can accommodate an increase in the number of dwellings. Furthermore, land to the East of School Lane, Whitminster has also been promoted in response to the Draft Local Plan and is included in the SALA2017 ref (WHI001) see further comments below

## 4. Spatial Options: a reserve housing supply

Qu.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 - you should start an immediate review of the Plan instead
$\boxtimes$	No - other option (Please specify)

Whilst the identification of reserve sites was recommended by the Local Plans Expert Group in 2016, this approach was not included in the revised NPPF in 2019. Consequently, the concept of reserve sites is not supported. The approach outlined in the NPPF is to ensure that provision is made to support the Government's objective to significantly boost the supply of homes; in order to do this it is important that a sufficient amount and variety of land can come forward where it is needed.

In accordance with the NPPF, Plans need to be prepared positively, in a way that is aspirational but deliverable. Para 23 states that "Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area." My emphasis.

The tests of soundness require plans to be positively prepared i.e. "providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs."

The standard method uses a formula to identify the <u>minimum</u> number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

"The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates". Paragraph: 010 Reference ID: 2a-010-20190220

The housing requirement is often referred to as "at least" or a minimum. It is considered that more sites should be allocated than the minimum.

By adopting this approach and facilitating sites to come forward this would accord with the NPPF para 11, para 36 and para 60 and the PPG, in particularly in para 67 of the NPPF which states that the planning authority should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

Performance is monitored through the Housing Delivery Test and mechanisms are to be put in place to address any performance which fails to meet the requirements. The HDT is also one of a number of factors that are considered when determining the need to review the plan, along with whether the authority can demonstrate a 5 year supply of deliverable sites for housing and whether issues have arisen that may impact on the deliverability of key site allocations.

Generally Local Plans are to be reviewed at least once every five years and the review process is a method to ensure that a plan and the policies within remains effective. There will be occasions as referred to above and also where there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies earlier than the statutory minimum of 5 years, for example, where new cross-boundary matters arise. This is to ensure that all housing need is planned for as quickly as reasonably possible.

Qu.4b Would you support or object to Option B - "Towns and villages", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site).

☐ Support
□ Object     □ Object
Please explain your answer
Please see answer to Question 3 above. Reserve sites are not supported, instead more than sufficient sites should be allocated in the Plan in accordance with the NPPF paragraph 67 and to ensure a 5 year housing land supply etc. and that there is a significant boost to the supply of homes in the district in accordance with the NPPF.
Qu.4c Would you support or object to Option C - "Additional growth point", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site).
☐ Support
Please explain your answer
Please see answer to question 3 above. Reserve sites are not supported, instead more than sufficient sites should be allocated in the Plan in accordance with the NPPF paragraph 67 and to ensure a 5 year housing land supply etc. and that there is a significant boost to the supply of homes in the district in accordance with the NPPF.
Qu.4d Would you support or object to Option D - "Wider dispersal", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site)
☐ Support
☑ Object
Please explain your answer
Option D "Wider dispersal" is not supported as an option as it is not consistent with the NPPF, it would not support a sustainable strategy.
Qu.4e Would you support or object to a hybrid or combination of options in order to identify an additional reserve site (or sites)?
<ul><li>☐ Support (Please answer Qu. 5 to explain which hybrid/combination of options you would support)</li><li>☐ Object</li></ul>

site	es comments above in response to Question 3. As an objection is made to the concept of reservents, it is considered that the plan should include sites to provide sufficient flexibility to enable using needs to be met.
	f Can you suggest another strategy / spatial option for the identification of a reserve sites?
	Yes
X	No
leas	se describe it
	If you answered yes to Q4e above, please explain which of the spatial options (B-D) you
voul	d like to see combined in a hybrid strategy, and why?
	Option A - Intensify
	Option B – Towns and villages
	Option C – Additional growth point
	Option D – Wider dispersal
Ш	No, I would support another option (Please specify below)
eser	E: if a site in the Local Plan does not come forward for development as expected, the a rve site may be required. However, the "trigger" for allowing a reserve site or sites to receive ning permission needs to be clearly set out in the Plan, to avoid doubt or uncertainty. There
	d be a variety of triggers / reasons for bringing a reserve site into play.
Qu.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 build rates set out in the Local Plan?
	Another trigger (please specify below)

https://app.smartsurvey.co.uk/survey/print/id/800320?t=1&dst=true&dsl=true&dpt=tr... 23/11/2020

Please	explain	vour	reasons

The principle of reserve site(s) is not supported. If such an approach were included it raises many questions in terms of what triggers a reserve site coming forward and if that site is regarded as a suitable site why should it be "restrained or delayed in any way" when there is a clear objective to significantly boost housing supply.
In order to overcome a possible situation where there is a delay to an allocated site receiving planning permission or housing delivery not coming forward as envisaged, by having a wide range of sites included in the plan in excess of the minimum housing requirement this will provide some flexibility.

## 5. Additional housing options - Potential sites

	Qu.7a Do you support or object to the development of a site identified at: (BER016) Hook Street farm, Lynch Road, Berkeley?
	Support
	☑ Object
F	Please explain
	It is noted in the SA that this site is recorded as containing areas of land within flood zones 3a or 3b and therefore a significant negative effect in relation to SA objective 12: flooding ( red double negative).
	There is no Flood Risk Assessment of this site or for BER017 as the Council's evidence base relates to the SFRA (Draft 2019) which only covers site PS33 in the Draft Plan and identifies the flood risk.
	The Environment Agency mapping for flood risk shows the area as Flood Zone 3, with an area shown as flood defences running in a north /south direction to the west of Berkeley, running through the site. Therefore an objection is made to the site.
F	Ru.7b Do you support or object to the development of a site identified at: (BER017) Bevans Hill arm, Lynch Road, Berkeley?  Support  Object
F	lease explain
	The site is on greenfield land. An area of the site to the east lies within Flood Zone 3a or 3b but does not comprise more than 50% of the site's total area. However, in the absence of a SFRA, the Environment Agency provides information on the site – to the extent that the entire site would appear to be within Flood Zone 3 and the area benefits from flood defences. The SA only records this as a single negative.
	It is considered that this site is not suitable for development.

# Qu.7c Do you support or object to the development of a site identified at: (HAR017) Land at Sellars road, Hardwicke?

Support

	Object
Pleas	se explain
НА	R1 Land at Sellars Road which has the potential for 15 dwellings is well located in a sustainable ation and adjacent to a recently developed site.
	d Do you support or object to the development of a site identified at: (STR065) Beeches
Gree	en Health Centre, Stroud?
	Support
$\boxtimes$	Object
Pleas	se explain
No site	comment, this site is a small site in Stroud which will contribute to the range and choice of es.
	e Do you support or object to the development of a site identified at: (WHI012) Land south Lane, Whitminster?
	Support
	Object
Pleas	se explain
The cor Sch Lar in t in c	ere are other sites which have been promoted at the village of Whitminster which are insidered to be better located in terms of access and relationship to the village –i.e. land east of mool Lane and extending the proposed allocation west of School Lane (see below) and south of Hyde Lane is constrained by narrow access from a single track lane, this is recognised the SALA 2020 Site assessment for WHI012. The SALA states that this would need to be resolved order to have reasonable access to the site and for the site to have reasonable access to services diffacilities in the local area. This does not apply to land east of School Lane in the village, where tees directly off School Lane.
cor wh the	respect of land south of Hyde Lane the SALA assessment states that the site is "not policy impliant although there may be some potential for housing or community uses in the future ich would be reliant on the inclusion of SALA site WHI008 as submitted in 2017, without which is site as submitted does not have a suitable or viable access."  wever, site WHI008 is not proposed for development and there are some known constraints to its site as the site adjoins 2 Oak Cottages, a Grade II listed building on Hyde Lane and contributes

to the listed building's setting and historic context. The assessment for WHI008 states that there may be "Scope for some sensitively designed residential development or community use, preserving existing hedgerows and perhaps with reinforced planting to provide the listed cottage with a small 'buffer' – particularly if site access is to be achieved across the front of the listed

building's domestic curtilage. The impact on the setting of the listed building and the historic character of Hyde Lane is likely to influence the scale, massing and design of any new development."

In which case the same points can be applied to land south of Hyde Lane (WHI012) the impact on the historic character of Hyde Lane would be affected by development of WHI012, and furthermore it is considered that the single track access would be inappropriate. Consequently an objection is made to land south of Hyde Lane and it is considered that land east of School Lane should be included as well as increasing the site west of School Lane.

## Qu.8 Are there any other sites that you would like to be considered for future housing development?

<b>X</b>	<b>Yes, I would like to suggest a site</b> . Please describe the location and/or identify it on a map and
	explain your reasons. (Maps / files can be uploaded via this online questionnaire, after answering this question). Although we are keen to identify any sites with future potential, the Council has limited scope to pursue sites that are not actively promoted to us by a landowner or developer.
	Yes, I am a landowner / agent / developer and I would like to submit a new site. If you would
	like to promote an alternative site that has not previously been considered as part of the Local Plan Review or Strategic Assessment of Land Availability (SALA), please also fill in the Site Submission Form that can be found at www.stroud.gov.uk/localplanreview - the form can be uploaded here or you can send it to us separately. (Please clearly identify in any accompanying email or letter that you have also responded via this online questionnaire, so that we can easily link the responses up).

#### Comments

## Land West of School Lane and Land East of School Lane

## **Land West of School Lane.**

The current emerging allocation PS46 included in the Draft Local Plan 2019 has greater capacity as outlined in our representations in January 2020. The land lies north of the Whitminster Playing Field and is proposed in the Draft Plan for development comprising 30 dwellings and associated community and open space uses. The site, West of School Lane is included in the SALA (May 2017) (ref WHI005). The site adjoins existing built form and the existing settlement boundary to the south east and a number of residential properties and agricultural buildings to the north west. Development of the site will therefore involve the infilling of a gap between the existing settlement boundary and an area of built form to the northwest. The site is therefore well related to the existing built form of Whitminster.

The site is also well related to existing local facilities in the village of Whitminster, in particularly Whitminster CoE Primary School which is less than 100m to the south east of the application site. Whilst other local facilities (including bus stops) are located towards the east of the village they are all within a 5-10 minute walking distance of the site and therefore fully accessible to the application site without reliance upon the private car.

In our representations in January 2020, we set out how the site could accommodate an additional 60 dwellings (without harm) satisfactorily on that portion of the site that is currently proposed as an emerging allocation; consequently making an efficient use of land in accordance with the Section 11 of the NPPF (2019) and in a sustainable location. An illustrative layout was submitted with our representations to the Draft Plan in January 2020.

We also submitted additional information illustrating how around 100 dwellings (Scheme A) could be accommodated on a gross site area of 4.4 hectares having regard to the setting of the designated Industrial Heritage Conservation Area to the south west, the Grade II\* Listed Wheatenhurst Church to the north west, and the desirability of maintaining separation between

Whitminster and the group of buildings comprising Highfield House to the north west by providing landscaping/green infrastructure along the western and northern edges.

### Land to the East of School Lane

We also submitted in our representations to the Draft Plan in January 2020, land to the East of School Lane which has a gross area of 6.20 hectares and could accommodate around 200 dwellings (Scheme 1) or around 100 dwellings on part (Scheme 2). The SALA confirmed that there are no physical, environmental or heritage constraints preventing the development, both parcels to the west and to the east of School Lane have reasonable access to services and facilities in the local area. Land East of School Lane was included in the SALA May 2017, (ref WHI001) There are no significant physical constraints and the site is well related to the existing built form of Whitminster. The site is also well related to existing local facilities in the village of Whitminster, in particularly Whitminster CoE Primary School which is less than 100m to the south east of the application site. Whilst other local facilities (including bus stops) are located towards the east of the village they are all within a 5-10 minute walking distance of the site and therefore fully accessible to the site without reliance upon the private car.

Land east of School Lane is closer to the existing built form of the village and has much better access than land south of Hyde Lane (WHI012). Land south of Hyde Lane is constrained, as stated in the SALA 2020 Site Assessment—"the main physical constraint is access via a narrow lane"

Whereas land east of School Lane, there are no known physical constraints that would prevent development of this site. The site is relatively level; a public footpath crosses the site, there are no known ground contamination or land stability issues; there is good access to School Lane; there is reasonable access to services and facilities in the local area.

The latest Landscape Sensitivity Assessment (2016) has identified the site (ref changed to Wh04) as Medium sensitivity to Housing Use and High sensitivity to Employment use.

An initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to any designated heritage asset.

An initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to any designated natural environment site. The assessment did not consider whether there are protected species on this site.

The SALA (2017) concluded that:

"Although not currently policy compliant, there may be some potential for housing development in the future on the south eastern part of the site, south east of the public right of way, should the Local Plan strategy identify the need for growth in this location although substantial tree screening on the North Eastern boundary would be necessary to limit the impact on views from the north, north east and east. Employment development is not suitable."

It is noted that the SALA considers the development potential of the site,

"Taking account of the character of the site and its surroundings, the south eastern part of the site could be developed for medium density development typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of about 25dph, and the suggested yield is 45 units."

The site is environmentally unconstrained and will not lead to any harm in terms of impact on highway safety, flooding, heritage assets, landscape or biodiversity. The proposed development is therefore considered to represent sustainable development in accordance with paragraph 11 of the NPPF (2019) with no unacceptable adverse or severe impacts that would significantly and

demonstrably outweigh the benefits of delivering housing in a sustainable location which would contribute towards the Council's five-year housing land supply requirement.

The LUC (2019) Sustainability Appraisal that accompanied the Draft Local Plan consultation indicated at in Appendix 5 page 125 Table A5.1 that the site performs well compared to other submitted sites at Whitminster. The site has no discernible impact on the historic environment or water quality, climate change or waste while it is judged as having a minor positive impact on housing, health and economic growth. However, it concludes in Appendix 7 page 694 that:

"Emerging Strategy Paper Stage: The SALA identified that the site may have future potential for some development subject to resolving specific constraints and impacts. However, the scale of development proposed and location of this site would not accord with the emerging strategy of allocating development at the main tier 1 towns and at two new settlements, together with modest allocations at tier 2 settlements and lesser allocations at tier 3a settlements nearest to Stroud and Wotton-under-Edge. Draft Local Plan Stage: Having considered the scale of growth appropriate for this settlement set out in the Draft Plan and the benefits and disbenefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development." (my emphasis)

The reasons for the Council's decision making are noted i.e. at this stage (in 2019) it was not proposed to allocate this site for development, however, circumstances have how changed and the Council is now considering potential sites to meet a possibly higher housing requirement as a result of changes to the standard method (the revised standard method proposes increasing the requirement for Stroud district from the level set out in the Draft Plan in 2019 of 638 homes per annum to 786 homes per annum).

In which case land east of School Lane, should be reconsidered particular given the positive assessment above.

Land south of Hyde Lane was not assessed in 2019 SA as it had not been submitted to the Council. The site appears in the 2020 SALA referenced WHI012 and has been assessed in the Sustainability Appraisal 2020.

However, in the latest SA there is no comparison assessment of the all the potential sites for Whitminster i.e. no replica table of Table A5.1 in the 2019 appraisal as it only focuses on new potential sites.

In order to compare both sites i.e. land south of Hyde Lane (WHI012) and land east of School Lane Sustainability Appraisal (WHI001) it is necessary to refer to the 2020 Sustainability Appraisal (SA) and the 2019 Sustainability Appraisal (SA) respectively and it can be seen land south of Hyde Lane does not score as well in the assessment, it receives three double negatives and a question over the affect on the historic environment.

It is considered that land east of School Lane is more sustainable, being within walking distance of the school, where safe routes can be achieved, the site if generally more accessible as it is not accessed from a single track lane and the site was screened out of the SALA Heritage assessment as having no heritage impacts.

Consequently land east of School Lane has a more positive SA assessment and should be included in the Plan.

See attached Plans.

forms here. Allowed file types include PDF, jpg, jpeg, doc, docx, xls, xlsx		
Choose File  Browse		
6. Potential growth points		
Qu.9a Do you support or object to the development of Potential Growth Point 1 (PGP1) - Land at Grove End Farm, Whitminster. Including SALA sites WHI007 and WHI014. Potential for up to 2,250 dwellings, 13 hectares employment, local centre, primary school, community facilities and open space. Please explain why you support or object to the development of this broad location. If your comments relate to a specific site within the broad growth point area, please reference the SALA site number(s).		
Support     Support		
☐ Object		
As part of a strategy which provides a range an choice of sites, PGP1 is supported.		
Qu.9b Do you support or object to the development of Potential Growth Point 2 (PGP2) - Broad location at Moreton Valence / Hardwicke. Including SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009. Potential for up to 1,500 dwellings, employment land, local centre, primary school, community facilities and open space. Please explain why you support or object to the development of this broad location. If your comments relate to a specific site within the broad growth point area, please reference the SALA site number(s).		
☐ Support		
PGP2 is not supported as it appears a disparate grouping of sites that have not been promoted collectively.		

	Yes, I would like to suggest a location that I think you should consider. Please describe the location and/or identify it on a map and explain your reasons. (maps / files can be uploaded via this online questionnaire, after answering this question). Although we are keen to identify any sites with future potential, the Council has limited scope to pursue sites that are not actively promoted to us by a landowner or developer.  Yes, I am a landowner / agent / developer and I would like to submit a new site. If you would like to promote an alternative site that has not previously been considered as part of the Local Plan Review or Strategic Assessment of Land Availability (SALA), please state the name of the site below and fill in the Site Submission Form that can be found at www.stroud.gov.uk/localplanreview - the form can be uploaded here or you can send it to us separately. (Please clearly identify in any accompanying email or letter that you have also responded via this online questionnaire, so that we	
	can easily link the responses up).	
Comm	nents	
File uploads Please upload any maps, supporting information or completed Site Submission forms here. Allowed file types include PDF, jpg, jpeg, doc, docx, xls, xlsx		
Choose File Browse		
7. Sustainability Appraisal		
Qu. 11 Please use the space below to provide comments on the Sustainability Appraisal that accompanies this consultation document?		
Comm	nents	
Hav Cou	ing read the SA and the assessment of the sites and the options, it recommends that the ncil continue with a hybrid approach to the spatial strategy. Pegasus on behalf of RHL support approach and consider that this best accords with the NPPF.	