

SA comparison of the assessment of PS36 Sharpness with Land at Grove End Farm, Whitminster

<https://www.stroud.gov.uk/media/1485648/appendices-3-9-sa-report-appendices-for-stroud-district-local-plan-review-pre-submission-draft-plan-may-2021.pdf>

For Sharpness – see SA May 2021 Appendix 7 page 780 – 785

For Grove End Farm, Whitminster - see SA May 2021 Appendix 6 page 658-659

The scoring is based on the SA Objectives and sub- objectives which are set out in full in SA Pages 9 – 12 Table 2.2 . Scores are attributed to each option or policy to indicate its likely effects on each SA objective (see page 15/15 of the SA) <https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review-pre-submission-may-2021.pdf>

SA Objective	Sharpness	Comments	Grove End Farm Whitminster	Comments
SA 1: Housing: To provide affordable, sustainable and decent housing to meet local needs.	++	<i>“The site has capacity for up to 2,400 homes by 2040. The Site Allocation policy text included in the Draft Plan set out the delivery of 2,400 dwellings within the plan period (5,000 dwellings by 2050). Strategic Site Allocation Policy PS36 in the Pre submission Draft Plan also provides for the delivery of 2,400 dwellings within the plan period (5,000 dwellings by 2050 subject to</i>	++	<i>“This site has capacity for more than 2,250 homes.”</i> It is not clear why Sharpness scores the same as Whitminster, as the market absorption rate/sales rate for Sharpness will be significantly lower than that for Whitminster due to its remote location (i.e. away from the key movement corridors) and lower desirability.

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		<i>Local Plan Review as part of phase 2 of the development). The policy also details that 720 affordable dwellings are to be delivered. The delivery of development at the site in line with the Garden City Principles is likely to help deliver a mix of housing types."</i>		For reasons set out in our representations the housing trajectory is not justified and consequently it will lead to uncertainty in terms of the delivery of the entire new settlement in the plan period and fundamentally the most important policy objective of the delivering homes will not be met.
SA 2: Health To maintain and improve the community's health with accessible healthcare for residents, including increasing levels of physical activity, especially among the young.	++/- -?	<i>"The site is not within 800m of a GP surgery. The site is within 800m of a Council play area, a green space and a protected outdoor playspace but includes a Council play area and a protected outdoor playspace within the boundary of the site (across both phase 1 and phase 2 of development) meaning that they could be lost to development. There are cycle routes within 400m. This site would include an area of open space. The site included community and open space uses in line with the Site Allocation policy text included in the Draft Plan. Strategic Site Allocation Policy PS36 in the Pre-submission Draft Plan also includes</i>	-/++	<i>"The site is not within 800m of a GP. The site is within 800m of a greenspace and a protected outdoor playspace. The site is located within 400m of a National Cycle Network route and a cycle route. The provision of new sports pitches at the site could benefit health and wellbeing in the district." Whitminster scores better</i>

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		<i>community and open space uses, as well as sports built provision and a local centre incorporating local retail, surgery and other community uses."</i>		
SA 3: Social inclusion: To encourage social inclusion, equity, the promotion of equality and a respect for diversity and meet the challenge of a growing and ageing population	0	<i>"Mixed use site options will all have negligible effects on this objective."</i>	0	<i>"Mixed use site options will all have negligible effects on this objective."</i> Both sites score the same
SA 4: Crime: To reduce crime, anti-social behaviour and disorder and the fear of crime.	0	<i>"Mixed use site options will all have negligible effects on this objective."</i>	0	<i>"Mixed use site options will all have negligible effects on this objective."</i> Both sites score the same
SA 5: Vibrant Communities: : To create and sustain vibrant communities	++	<i>"This site is on greenfield land. This site included community uses in line with the Site Allocation policy text included in the Draft Plan. Strategic Site Allocation Policy PS36 in the Pre submission Draft Plan also includes</i>	++	<i>"The provision of a new local centre at the site is likely to help improve the satisfaction of people with their neighbourhoods at this location."</i> The SALA Assessment 2020 has been undertaken for the whole site and concludes

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		<p><i>community uses. These are to be provided as part of a new local centre which would also include local retail and a surgery."</i></p> <p>It is not clear how the assessment can be made against the sub objectives and how the scoring can increase from 0 to ++ as the site is proposed in the Pre-Submission Plan. There is no evidence to justify the scoring.</p>		<p>that the site is suitable, available, achievable and that the site has potential for development to include a planned and comprehensive growth point development including housing, local centre incorporating retail and community facilities and employment, together with the creation of open spaces and landscaped buffers with the M5 and A38/A419. Detailed masterplanning of the site would be required, but at this stage it is noted that the site is being promoted for up to 2,250 dwellings, 18.3 hectares of employment land, a local centre, school and green infrastructure.</p>
<p>SA 6: Services and Facilities: To maintain and improve access to all services and facilities</p>	<p>++</p>	<p><i>"This site is at a tier 3a settlement. Both phase 1 and phase 2 lie in very close proximity of the existing settlement boundary. This site would include community uses but is not located within a town centre.</i></p> <p><i>The Site Allocation policy text included in the Draft Plan required the delivery of</i></p>	<p>++</p>	<p><i>"This site is at a Tier 3a settlement. The provision of a new local centre as part of development could help to improve access to services and facilities at this settlement."</i></p> <p>The location of this land at the confluence of the A38/M5 and A419 corridors, and relative proximity to Stroud/Stonehouse, Cam/Dursley</p>

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		<p><i>development at the site in line with the Garden City Principles which is likely to help promote access to these new facilities as part of the creation of vibrant, sociable neighbourhoods.</i></p> <p><i>Strategic Site Allocation Policy PS36 in the Pre-submission Draft Plan also requires the incorporation of a new local centre to include the provision of local retail, surgery and other community uses. The development is also to incorporate ultrafast broadband which will also improve access to services and facilities."</i></p> <p>Page 169 of the Pre- Submission Plan states that the proposed strategic allocation PS36 is not envisaged as an extension to the existing settlement of Newtown & Sharpness (which are Tier 3a), but as a distinct new Tier 2 settlement in its own right.</p>		<p>and Gloucester presents an opportunity to achieve a mixed use development in a sustainable highly accessible (including by public transport) location.</p> <p>The Site is located on the Main Movement Corridor as defined in the Stroud Sustainable Transport Strategy. Locating development on existing or potential high-quality public transport corridors represents some of the most sustainable options for any development strategy.</p> <p>Paragraph 1.25 of the Sustainability Appraisal (2020) that supported the consultation on Additional Housing Options states that : "A new growth point would support new service and infrastructure provision which could help to reduce the need to travel by private vehicle in the plan area as well as potentially supporting infrastructure which could support the use of energy from more sustainable sources. Importantly, it would also ensure that housing</p>

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		<p>Whilst the new community is proposed to include community facilities etc, the location is not sustainable and will lead to significant out commuting etc</p> <p>Given the location it is not clear why Sharpness scores the same as Grove End Farm Whitminster.</p>		<p>need in the plan area is met by delivering a high level of development at a single location. This approach could also support a large amount of affordable housing delivery in Stroud District."</p> <p>The site provides the opportunity to deliver a comprehensive mixed use development which links and complements the existing settlement pattern and provides for housing, employment, social and recreational needs with access to extensive green infrastructure.</p> <p>The SA recognised the benefits of this location e.g. the existing strategic road access could help make the area attractive as a location for inward economic investment.</p>
<p>SA 7: Biodiversity/geodiversity: To create, protect, enhance, restore and connect habitats, species and/or sites of</p>	++/--?	<p>"Phase 1 of the site is within 250 m of the Severn Estuary SAC/SPA/RAMSAR site and SSSI is a key wildlife site."</p>	-?	<p>"The site is not within 1km of an internationally or nationally designated site. The site is within 7.7km of the Severn Estuary SAC/SPA/Ramsar site. It is also within 250m of Mole Grove KWS, Stroudwater Canal – Whitminster KWS and River Frome Mainstream & Tributaries KWS."</p>

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biodiversity or geological interest.		<p>It is inconceivable why this score has changed from red --? to yellow ++/--?</p> <p>In the summary of SAS Findings for the strategic housing and mixed use site allocations, Paragraph 5.46 (page 128) of the SA (May 2021) – “the negative effects are supposed to be significant”...“this is due to their (reference is to Sharpness PS36 and Sharpness docks PS34) close proximity to the Severn Estuary SAC/SPA/Ramsar site and SSSI as well as GI assets within the site which could be lost to development.”</p> <p>The same paragraph then states that: “In the case of the Sharpness new settlement strategic site (PS36), the positive effects are likely to be significant as the site will deliver green infrastructure (including SANG) with biodiversity net gains, mitigation of impacts to Severn Estuary SAC/SPA/Ramsar site both on and</p>		<p>It is not clear how a minor negative (and uncertain) effect on biodiversity was reached. The Grove End Farm site is able to contribute in financial terms to the current Severn Estuary avoidance strategy and would not represent supporting habitat/functionally-linked land to qualifying bird species from the Estuary (as evident from surveys completed). In addition, the site has the ability to provide on-site public open space that would attract new residents (and existing local residents) and discourage regular visits to the estuary, i.e. provide everyday (dog) walking needs. Whilst there is proximity to a Key Wildlife Site (River Frome Mainstream and tributaries KWS) this is separated from the site by main A-roads and no significant effects are anticipated assuming standard engineering practices are implemented to prevent indirect effects from run-off etc. There is a full baseline of ecology surveys to inform the design of the development and so it is unclear how the SA identifies effects</p>

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		<p>off site and a provision of a new managed nature reserve.</p> <p>Impacts upon the Severn Estuary SAC/SPA/Ramsar site are to be mitigated on and off site.</p> <p>Furthermore, a new managed new nature reserve is to be provided.”</p> <p>Check See page 128 of the SA</p>		<p>as uncertain (albeit only minor). Either way, in biodiversity terms it is considered that the significant uncertain negative effects (albeit mixed with positive effects in the eyes of the authors) on the Sharpness allocation would be less preferable to the likely effects arising from the Grove End scheme particular with regard to the Severn Estuary.</p>
<p>SA 8: Landscapes/townscapes: To conserve and enhance the local character and distinctiveness of landscapes and townscapes and provide sustainable access to countryside in the District.</p>	+/--?	<p>Not clear why this has changed from red -? To +/--?</p> <p>“Part of phase 1 of the site is in an area which was rated in the Landscape Sensitivity Assessment as being of medium – high sensitivity to residential development and high sensitivity to employment development.</p> <p>The Site Allocation policy text included in the Draft Plan required the incorporation of strategic landscaping. Strategic Site Allocation Policy PS36 requires the incorporation of landscaping buffers to</p>	--?	<p>“Much of the western edge of this site is in an area which was rated in the Landscape Sensitivity Assessment as being of high/medium sensitivity to residential development and being of medium sensitivity to employment development. The remaining area of the site has not been assessed as part of that work. It is not within the Cotswold AONB or within 500m of the AONB.”</p>

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		<p><i>incorporate new native hedgerows and trees. The development is to respond to the landscape context within the Berkeley Vale. These more stringent requirements may potentially limit impacts in terms of the local landscape setting; however, impacts will be dependent on the specific design of development, which is unknown at this stage."</i></p> <p>See para 5.51 of the SA "the Sharpness new settlement (PS36) and Land at Whaddon (G2), the <u>negative effects are likely to be significant</u> as they contain land which has been assessed as having medium-high sensitivity to residential development through the Landscape Sensitivity Assessment undertaken for Stroud or the landscape sensitivity assessment undertaken as part of the Gloucestershire Strategic Development Opportunities work."</p>		

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		<p>The SA states : “All of the aforementioned sites are also expected to have positive effects in relation to SA objective 8 given the requirement through the site allocation policies for the incorporation of structural landscaping buffers and/or incorporation of new native hedgerows and trees included as part of development.”</p> <ol style="list-style-type: none"> 1. The site lies within an open and green gap which strategically lies aside the Severn. As such it provides an important open landscape that contributes to the setting of the Severn in this area. This setting is appreciated from the Cotswolds AONB and from elevated land west of the Severn. 2. The open green gap plays an important role in the separation of the local settlements of 		

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		<p>Berkeley, Sharpness and from the built environment of Berkeley power station. The open green gap maintains a rural setting to local settlement and ensures that the scale and pattern of settlement is in keeping with the smaller scale identified in published landscape assessment.</p> <p>3. The land itself illustrates an intricate and intact field pattern, defined by well established hedges and hedgerows. Trees are notably limited within the proposed allocation area creating a strong sense of openness and limiting existing green infrastructure as an inherent mitigation to development. The introduction of mass tree planting as part of future mitigation would be out of character with the</p>		

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		<p>landscape character of the proposed site close to the Severn estuary.</p> <p>4. The openness of the site suggests a high visual sensitivity in long distance views where the Severn and its vale are seen in the context of the bordering higher ground to both the east and the west of the Severn. Although the vale is settlement, settlement is seen in lower density and smaller scale than the major settlement areas. The introduction of large scale settlement between Berkeley, Sharpness and the built form of Berkeley power station will urbanise a presently open agricultural landscape that lies immediately adjoining the River Severn. This would not reflect the pattern of settlement seen along</p>		

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		<p>the margins of the Severn estuary and would be a significant change in the character of this open landscape.</p> <p>5. Unlike many areas of the vale, the proposed PS36 site is less influenced by the detrimental impacts of the numerous communication corridors that pass through the vale in particular the motorway corridor.</p> <p>6. The above points are summarised in the Stroud Landscape Character Assessment which says of the Sandstone Ridge Landscape Character Type:</p> <p><i>'This is a sensitive landscape, visible across a wide area from within Stroud District and from the other side of the Severn estuary, and new development therefore</i></p>		

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		<p><i>needs to be considered carefully. Development pressures are likely to be high around settlements, with possible encroachment into open countryside and extending linear development along roads, resulting in the connecting of individual settlements. The main threat arises from unsympathetic design and new development should respond to the local vernacular, scale and grain, helping to retain the difference between Sharpness settlements and the more rural villages such as Purton.....</i></p> <p>The scoring of the Grove End and Sharpness sites does not appear to present assessment as evenly weighted and as such does not provide a fair or reliable comparison. It appears subjective to the weight given to Sharpness in terms of the effectiveness of landscape mitigation. It is clear that with mitigation the Grove End Farm site can as part of a sensitive and well considered design,</p>		

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		<p>achieve an acceptable scheme. However, there is no explanation as to why the potential effects of mitigation are considered for the one site but not the other. When considering the sensitivity of the whole Sharpness site in terms of rural openness and its role in the setting of the Severn, it clearly justifies its assessment of medium high sensitivity to residential development and high sensitivity to commercial development. The Sharpness site has clearly been identified having greater sensitivity to development as a whole than the Grove End site.</p> <p>Another anomaly is that the higher landscape sensitivity identified for both sites, relates to parts of the site and not the whole site. In this respect both the Sharpness and Grove End sites are the same and weight should not be given to any one site over the other. The question not resolved is what sensitivity is the land</p>		

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		<p>which falls outside of the medium high sensitivity in both cases and how effective might mitigation be. If mitigation can be seen to be successfully applied to the Sharpness site why not the Grove End site? The matter that not all of the Grove End site has been assessed further undermines the 'significant negative effect likely' rating given to the Grove End site when clearly the Sharpness site has been identified to have greater sensitivity to development.</p> <p>It is concluded that the 'significant negative effect likely' assessment of the Grove End site does not appear to be justifiable when compared with the evidence that has been used to underpin the assessment of the Sharpness site. Based on the extent and nature of the evidence, the Grove End site should be assessed to have a 'Mixed minor or significant effects likely rating'.</p>		

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<p>SA 9: Historic Environment: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District’s historic environment.</p>	<p>+/-</p>	<p><i>“The majority of the site scored 2 in the SALA heritage assessment. The Site Allocation policy text included in the Draft Plan did not include requirements which might address impact on the historic environment. Strategic Site Allocation Policy PS36 requires development achieve a layout, density and built form which responds to the heritage context within the Berkeley Vale.”</i></p>	<p>-</p>	<p><i>“This site comprises site WHI007 which scored 2 in the SALA heritage assessment 2018 and site WHI011 which scored 2 in the SALA heritage assessment 2020.”</i></p> <p>It is not clear why there is a difference in scoring when both Sharpness and Whitminster score 2 in the SALA Heritage Assessment.</p> <p>Furthermore we object to the SALA Heritage Assessment.</p> <p>In our Built Heritage Assessment we were of the view that the principal significance of the conservation area was derived from its industrial heritage – namely that the designation follows the course of the Stroudwater canal and includes a lot of the former associated built heritage (mill buildings and canal infrastructure) that formed an integral part of the canal activity and therefore, we argue, the defining component of the designation’s significance. The fact that it passes</p>

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				<p>through rural countryside to the Sharpness canal is, we believe, largely inconsequential to this significance given that it's the industrial infrastructure rather than rural landscape which it derives the bulk of its character and appearance from. To this end, we were not of the view that development should be actively avoided on this southern boundary, though did suggest, where possible, additional tree planting to soften the edge of the development area where it transitions to the wider rural landscape.</p> <p>It is also worth noting that the consultant also flags up the new section of canal which is linking the two ends of the canal together and the potential impact upon this with any development on the southern reaches of the Site. This new section is not in the same location as the original now infilled section and given the changes to the A38/A419 junction is actually having to pass underneath the roundabout which channels traffic on two busy roads. Allied</p>

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				to the fact that it passes the busy and noisy M5 we believe there remain a number of existing urbanising influences.
SA 10: Air quality: To ensure that air quality continues to improve.	++/-	<p><i>“Portions of phase 1 of the site scored between 67 and 70 in the Stroud SALA Transport Accessibility Assessment. Portions of phase 2 of the site scored between 67 and 82 in the Stroud SALA Transport Accessibility Assessment.”</i></p> <p><i>“Site Allocation policy text included in the Draft Plan required the site to be developed to allow for a new rail station and rapid bus services. The site was to be delivered to prioritise walking, cycling, and public transport over the use of private car in line with this draft policy. Furthermore, the provision of new services and facilities at the site in line with the Garden Village Principles could help to reduce the need for residents to travel</i></p>	-	<p><i>“The site scored 78 in the Stroud SALA Transport Accessibility Assessment.”</i></p> <p>It is not clear why there is a difference in scoring. According to Table A4.1: ‘Assumptions for the appraisal of residential site options’, Objective SA10 ‘To ensure that air quality continues to improve’ has been assigned a ‘score’ based on the SALA Transport Accessibility Assessment undertaken by Gloucestershire County Council on behalf of Stroud District Council (SDC). The SA states that this work rated each site option in terms of its accessibility to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. <u>The full details of how the score for each site was determined are not set out in the Sustainability Appraisal Report.</u></p>

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		<p><i>from the area on a regular basis. In line with Strategic Site Allocation Policy PS36 in the Pre submission Draft Plan, the site is expected to be developed to support sustainable transport measures, reduce car ownership and car usage, improve public transport permeability and enhance bus connections to key destinations including Bristol and Gloucester, as well as a new railway station and enhancements to the Sharpness branch line.”</i></p> <p>See justification in para 5.53 on page 130 of the SA</p> <p>The score for PS36: Sharpness new settlement in respect of SA10 at the Equivalent Site Option stage was double negative (Significant negative effect likely), reflecting its relatively remote location. The score was upgraded to double positive/double negative (Mixed</p>		<p>As set out in Appendix 5 ‘Summary of effects for and detailed SA matrices for all of the site options considered to date’ the score for WHI014/PGP1: Land at Grove End Farm in respect of SA10 is a single negative (Minor negative effect likely), which is a more favourable ‘baseline’ score than PS36: Sharpness new settlement as would be expected.</p>

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		<p>significant effects likely) at the Draft Local Plan stage and upgraded again to double positive/single negative (Mixed significant positive and minor negative effects likely) at the Pre-submission Draft Local Plan stage.</p> <p>The justification for the upgrading to the score for PS36: Sharpness new settlement in respect of SA10 states:</p> <p><i>“Site Allocation policy text included in the Draft Plan required the site to be developed to allow for a new rail station and rapid bus services. The site was to be delivered to prioritise walking, cycling, and public transport over the use of private car in line with this draft policy. Furthermore, the provision of new services and facilities at the site in line with the Garden Village Principles could help to reduce the need for residents to travel from the area on a regular basis. In line</i></p>		

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		<p><i>with Strategic Site Allocation Policy PS36 in the Pre-submission Draft Plan, the site is expected to be developed to support sustainable transport measures, reduce car ownership and car usage, improve public transport permeability and enhance bus connections to key destinations including Bristol and Gloucester, as well as a new railway station and enhancements to the Sharpness branch line.”</i></p> <p>As set out elsewhere in representations, Sharpness is in a relatively remote location some significant distance from the main movement corridors and major centres of employment. The new rail service cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is in question. In contrast to the relative remoteness of Sharpness, the omission site of Grove End Farm, Whitminster, is</p>		

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		located at the hub of main movement corridors as identified in the STS, where improvements to facilitate travel by alternative more sustainable modes of transport would be much more readily achieved, and is favourably located in relation to employment destinations including Stonehouse, Stroud and Gloucester.		
SA 11: Water quality: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District.	+	<i>"The site is not within a Drinking Water Safeguarding Zone or a Source Protection Zone."</i>	--?	<i>"A large part of the southern portion of the site falls within a Drinking Water Safeguarding Zone."</i> From the work that we have undertaken as part of the preparation of the planning application for the site, the scoring should be negligible effect 0.

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<p>SA 12: Flooding: To manage and reduce the risk of flooding and resulting detriment to public wellbeing, the economy and the environment.</p>	+/--	<p><i>“The site is on greenfield land and a large portion of this land falls within flood zone 3a or 3b. This land is mostly within phase 1 of the site.” (my emphasis)</i></p> <p><i>“...Strategic Site Allocation Policy PS36 in the Pre-submission Draft Plan requires a strategy for mitigating flood risk including attenuating and disposing of surface water through SuDS.”</i></p> <p>It should be noted that:</p> <p>The area adjacent to the River Severn are shown as Flood Zones 2 and 3; flood defences provide protection to part of the site for the 1:100 annual exceedance probability event.</p> <p>Because of climate change effects, the standard of protection afforded by the flood defences will be reduced over time. To ensure that the development is</p>	-	<p><i>“The site is on greenfield land outside of flood zones 3a and 3b” (my emphasis)</i></p> <p>The entirety of Site is located in Flood Zone 1 based on Environment Agency (EA) Flood Mapping (lowest risk of fluvial flooding). Small components of the Site are shown on EA detailed mapping to be susceptible to risk of surface water flooding.</p> <p>The preliminary desk based assessment concludes that there is no significant flooding or drainage issues that would prevent the development of the Site. Therefore in terms of flooding or surface water drainage the land at Grove End Farm is considered to be a sustainable location for development.</p> <p>Grove End Farm scores better</p>

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		<p>protected for its lifetime improvements to the flood defences will be required.</p> <p>The main accesses to the site will be from the B4006 that is currently subject to flooding. Safe access and egress will be required for the 1:100 plus climate change fluvial and rainfall events. To achieve this access routes will need to be raised above the flood level.</p> <p>IDP (2021) There are no Environment Agency sponsored schemes proposed within its current 6-year FCERM (Flood and Coastal Erosion Risk Management) Capital Investment Programme that relate to any of the sites highlighted within Stroud District.</p> <p>New Settlement at Sharpness The River Severn forms the western boundary of the southern parcel, with the</p>		

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		<p>Little Avon forming the boundary to the south of the site. A large part of the site is within Flood Zones 2 & 3; the site was subject to fluvial flooding in 2012 from the Little Avon.</p> <p>Over a third of the site is considered to be at risk of a 1 in 100-year flood event from tidal/fluviial flooding from the River Severn and around a quarter of the site is considered to be at risk of a 1 in 100-year flood event from Little Avon. The extent of the flooding will increase over the lifetime of the development because of climate change and the predicted increase in sea/tidal levels and fluvial flows, and the increase in rainfall intensity.</p> <p>The southern part of the site benefits from flood defences in the form of a coastal embankment, which provides a protection from a 1 in 100-year flood. The northern part of the site is not covered by</p>		

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		<p>this embankment and there remains a risk across the site from the Little Avon. The effectiveness of the defences will decrease over time because of climate change; improvements to the defences will be required to provide protection for the lifetime of the development.</p> <p>The Environment Agency is actively considering changes to the Shoreline Management Plan that would affect the site. Details, funding, and timescales are not identified in the IDP.</p> <p>In summary the main issues are:</p> <ul style="list-style-type: none"> • Improvements to flood defences will probably be required because of climate change effects (details, funding and timescales are not included in the IDP). • Risk and extent of flooding from River Severn and Little Avon will increase 		

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		<p>due to climate change (increases in sea/tide levels, river flows, and rainfall).</p> <ul style="list-style-type: none"> Main access is from the B4006 that is shown at flood risk in both the north and south of the site. Safe dry access will be required so access routes will probably need to be raised. <p>The score should be red negative.</p>		
<p>SA 13: Efficient land use: To improve efficiency in land use and protection of soil quality through the re-use of previously developed land and</p>	--	<p><i>"The site is relatively large in size and on mostly greenfield land. The site is within an area of Grade 3 agricultural land."</i></p>	--	<p><i>"The site is relatively large in size and on greenfield land. The site is within an area of Grade 3 agricultural land."</i></p>

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existing buildings and encouraging urban renaissance.				
SA 14: Climate change: To implement strategies that help mitigate global warming by actively reducing greenhouse gases and adapt to unavoidable climate change within the District.	+	<p>“Mixed use site options will all have negligible effects on this objective.”</p> <p>It is not clear what the justification is for the score changing from 0 to +</p>	0	<p>“Mixed use site options will all have negligible effects on this objective.”</p> <p>Surely Whitminster being a more sustainable location should score higher.</p>
SA 15: Waste: To minimise the amount of waste produced, maximise the amount that is reused or recycled, and seek to recover energy from the largest proportion of the residual material, and achieve the	0	“This site is on greenfield land.”	0	“This site is on greenfield land”

SA Objective	Sharpness	Comments	Grove End Farm Whitminster	Comments
sustainable management of waste.				
SA 16: Employment: To deliver, maintain and enhance sustainable and diverse employment opportunities, to meet both current and future needs.	++	<p><i>“This site could deliver 2,400 homes and 10ha of employment land. Both phases of the site are located within 600m of key employment sites Severn Distribution Park and Rigestate, Station Road but neither site is at a Tier 1 or Tier 2 settlement.”</i></p> <p><i>“The Site Allocation policy text in the Draft Plan required delivery of development in line with the Garden City principles which is likely to help ensure that a wide range of local jobs are provided within easy commuting distance of homes. The Local Sites Allocation Policy PS36 in the Pre submission Draft Plan also sets out that 10ha of B1, B2 and B8 employment land would be provided at the site. A new local centre is to be provided to incorporate employment uses.”</i></p>	++	<p><i>“This site could deliver 2,250 homes and 18ha of employment land as part of mixed use development.”</i></p> <p>The Council’s Employment Land Review (March 2021) concluded that land at Grove End Farm, Whitminster:</p> <p><i>“<u>this would seem to be the strongest of the options.</u> Land here is optioned to a commercial developer who is already active locally, marketing/developing E/BClass plots at SA2: West of Stonehouse, so has existing knowledge of local market conditions. Positioned at Junction 13, M5 it can tap into both the M5 Corridor market and demand for Stonehouse, a centre for both B2/B8 business expansion in the Stonehouse/Stroud Valleys area and for larger E1(g) (i) offices. It would be well placed to meet longer term growth needs if employment land around Great Oldbury is taken up relatively early in the Plan period. Assuming the Eco Park</i></p>

SA Objective	Sharpness	Comments	Grove End Farm Whitminster	Comments
		<p>The allocation of Sharpness does not support SA16 and is inconsistent with the Council's Employment Land Review which does not support this site, consequently the score should be less than Grove End Farm, Whitminster.</p>		<p><i>proposal was brought forward, critical mass around Junction 13 would further increase, with the area becoming a centre for advanced manufacturing in Stroud District"</i></p> <p><i>Page 164 of the ELR states, Whereas "<u>PS36 New Settlement at Sharpness - Sharpness is far from isolated from Gloucestershire and Bristol markets, and the proposal for a Knowledge Based business park would benefit from a proximity to GSTP which lacks options to meet the needs of larger technology businesses, both firms expanding from its accommodation and inward investors, particularly manufacturing/logistics firms. In the short-mid term, the Eco Park Proposal, if realised, could meet a lot of this need. In the longer term, some 10-15 years, a Knowledge Based business park at Sharpness could be well placed to support further growth. 10-15 years is perhaps a realistic timeframe for the delivery of an employment scheme within the complex Sharpness New Settlement.</u>"</i></p>

SA Objective	Sharpness	Comments	Grove End Farm Whitminster	Comments
				<p>Page 159 of the ELR states: <u><i>“The employment land at Grove End Farm, Whitminster is in a very strong location off Junction 13, M5 allowing it to tap into the two core markets of the District – larger sub-regional/regional requirements on the M5 Corridor and large business growth in Stroud/Stonehouse. The linear nature of the proposed employment site would prevent development of the very largest B2/B8 units here, but it could still provide some 52,000 sqm of space at standard developer ratios.”</i></u></p> <p>Grove End Farm, Whitminster is within the control of an experienced employment and residential developer/promoter with a proven track record of delivering strategic sites in Stroud and Gloucestershire, who is already active in the area, marketing E/B-Class plots at West of Stonehouse, thus knows the local market and business requirements.</p>

SA Objective	Sharpness	Comments	Grove End Farm Whitminster	Comments
				<p>The site would also benefit from proximity to the Eco Park proposal, which would build up a critical mass of businesses at Junction 13. There could be some competition between the two sites, however, the Eco Park will focus on accommodating businesses with specialisms in green technology. There is no assumption the Land north of Grove End Farm will have a similar, overlapping focus.” (my emphasis).</p>
<p>SA 17: Economic growth: To allow for sustainable economic growth within environmental limits and innovation, an educated/ skilled workforce and support the long term competitiveness of the District.</p>	<p>++?</p>	<p><i>“This both phases of the site are within 800m of Berkeley Primary School and Sharpness Primary School. The site could deliver 10ha of employment land.</i></p> <p><i>The Site Allocation policy text in the Draft Plan required the delivery of land for the development of primary and secondary schools. The delivery of development in line with the Garden City principles is likely to help ensure that a wide range of local jobs are provided within easy commuting</i></p>	<p>++?</p>	<p><i>“The site is located within 800m of at least one existing primary school but is not within 800m of an existing secondary school. This site could deliver 18ha of employment land as part of mixed use development. It would also include the delivery of a new primary school.”</i></p> <p>Given the above it is not clear what the justification for Sharpness to score the same as Grove End Farm, Whitminster.</p>

SA Objective	Sharpness	Comments	Grove End Farm Whitminster	Comments
		<i>distance of homes. The Local Sites Allocation Policy PS36 in the Pre submission Draft Plan also includes the development of a primary school, as well as contributions towards the provision of a secondary school. The Local Sites Allocation Policy PS36 in the Pre-submission Draft Plan also sets out that 10ha of B1, B2 and B8 employment land would be provided at the site."</i>		