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From: [Redacted]
Sent: 05 December 2017 21:49
To: _WEB_Local Plan
Subject: Stroud Local Plan Review - Representations on behalf of Hallam Land Management
Attachments: Stroud LP I and O Consultation - HLM Representations (SUB).pdf; ATT00001.htm; Stroud LP I and O Consultation - HLM Representations Form.pdf; ATT00002.htm

Dear Sir / Madam,

Earlier today I sent the attached representations to the Stroud Local Plan Review on behalf of Hallam Land Management.

I would be very grateful if you could provide email confirmation that the representations have been received.

Many thanks,

[Redacted]

[Redacted]
**Director
Planning**

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December 2017

Stroud Local Plan Review

Representations to the Issues & Options Consultation (October 2017)

Prepared by Savills on behalf of Hallam Land Management

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The Savills logo consists of a solid yellow square positioned above the word "savills" in a lowercase, sans-serif font. The text is dark red or maroon in color.



Introduction

These representations have been prepared by Savills on behalf of Hallam Land Management (HLM) in response to the consultation on the Stroud District Local Plan Review Issues and Options Paper.

HLM control a significant area of land to the south of Gloucester, known in the consultation document as Whaddon (Option G2). The broad area has previously been promoted through both the Stroud Local Plan and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS).

The northern part of the broader area, which is contained entirely within Gloucester City, has been granted planning permission for up to 250 dwellings. HLM continue to promote the remainder of the land which falls entirely within Stroud District.

The land adjacent to that controlled by HLM is under option to Taylor Wimpey (TW). Between them, HLM and TW control all of the land within the Option G2 area. The two landowning parties intend to plan for a comprehensive approach to the masterplanning and delivery of development across the wider area.

We welcome the opportunity to provide input into the plan preparation process at this early stage. Given our client's land interests, the majority of our comments relate to Sections 3.1 and 3.2 of the consultation document. Before commenting upon those sections however there are a number of general points that we would like to make:

- Key issues 1-8 relate to the economy and are largely focused around economic growth and job creation. There is an acknowledgement, as there was through the adopted Local Plan, that there are significant levels of out commuting from Stroud to neighbouring authorities for employment purposes. Key issue 3 seeks to counter this and "address" the high levels of daily commuting.

Whilst we very much support the Council's aspirations for job creation, it is important that this is also realistic and deliverable. It is inevitable that Gloucester and Cheltenham to the north and Bristol and Swindon to the south will remain important locations for employment throughout the plan period; they are large cities and towns with good communications, major universities and large existing employment hubs. This reality should be recognised in the spatial strategy and distribution of development as it will have a direct bearing upon the most sustainable distribution of housing growth.

- In practice, the most sustainable spatial strategy is likely to involve housing development at the main settlements within Stroud where this is justified on economic and demographic grounds, alongside growth to the south of Gloucester where this can most sustainably meet the housing needs of the existing and future population. In this



respect, we strongly support the explicit review of the principal development opportunities to the south of Gloucester.

- Key issue 9 is the first in the list relating to housing. This recognises, as a priority, the need to meet the District's identified future housing needs. We strongly welcome this commitment, and that in Key Issue 10 which makes reference to working with neighbouring authorities to meet their housing needs where appropriate to do so as agreed through the duty to cooperate.



Future Growth Strategy

Section 3.1 of the consultation document suggests five alternative options which could be employed to meet future development needs. There are advantages and disadvantages to each option which need to be considered by the local planning authority and evaluated through the sustainability appraisal (SA). Whilst we do not wish to pre-judge the SA process, the likelihood is that no one single option will be employed exclusively and that a combination of locations and opportunities will be needed to sustainably deliver the development required during the plan period.

One option that we consider should form a key component of the spatial strategy is the concentration of housing and employment development at appropriate and large sites located adjacent to the main towns. This is similar to option one, but where we disagree with how this is characterised in the consultation document is that the main towns do not necessarily need to be located within the District.

Large scale development will not meet all of the future housing and employment growth requirements within Stroud District and it is important that those which are allocated are carefully located and conceived. Due consideration must be given to the deliverability of both the development and supporting infrastructure in determining which opportunities should be pursued through the Local Plan Review.

Within Stroud District there are significant variations in market demand. Those locations with good access to transport infrastructure, community facilities and employment opportunities generally have strong market demand, whereas more rural, isolated locations will have significantly slower delivery rates and be less attractive to the market. Locations adjacent to the largest urban areas, including those both within and outside the authority area (i.e. to the south of Gloucester), generally fulfil these criteria and are therefore locations with the highest level of demand.

In conclusion we therefore support the identification of a mixed spatial strategy comprising a range of large and small sites. Where large sites are allocated however, these must be in locations where there is sufficient market demand to deliver the development and support delivery of infrastructure during the plan period.



Gloucester's Fringe

We are pleased to see that there is a section in the Issues and Options document dedicated to the opportunities for growth to the south of Gloucester. Gloucester City administrative area is tightly drawn around the boundaries of the existing urban area. It is simply not possible for the City to meet its own requirements and, for reasons of soundness, it is necessary therefore for the neighbouring authorities to assist, in accordance with paragraph 182 of the Framework.

Disregarding administrative boundaries, there are a number of environmental and policy constraints limiting opportunities for development around Gloucester. In particular, areas of significant flood risk preclude large swathes of land to the north and west of the City. Those areas to the north and west of the City that are unconstrained by flood risk have been allocated for development within the JCS. There are no further options for major development which are not constrained.

To the east of the City, lies the Green Belt between Gloucester and Cheltenham. A number of sites have been removed from the Green Belt through the JCS process. The removal of these areas reduces the extent of the Green Belt quite considerably and, there are very limited opportunities for further Green Belt release in the future which would not substantially impact upon its primary purpose of preventing the coalescence of Gloucester and Cheltenham. Indeed, despite concluding that there remains an unmet need for housing, the JCS Inspector removed one proposed allocation in the Green Belt, due to the magnitude of the harm caused. On this basis, it is reasonable to conclude that there are few, if any, opportunities for major development within the Green Belt.

The consequence of these constraints is that south of Gloucester represents a good opportunity for significant housing to meet the future needs of the city. Indeed, this was the conclusion of the JCS Examination Inspector who, in her Interim Report (26 May 2016) stated that:

"79. On the evidence before me there appear to be no other appropriate sites to form additional, sustainable, urban extensions to Gloucester, which fall entirely within the JCS area and have not otherwise been counted within Gloucester's district capacity. Nonetheless, there seem to be two reasonable omission sites on the southern edge of the Gloucester urban area in Brookthorpe/Whaddon (OM3)79 and Hardwicke (OM4)80, the former of which straddles the border with Stroud and the latter of which lies wholly within Stroud.

80. These sites are outside the Green Belt and, despite the City Council's desire to expand to the north, accord with the Spatial Strategy. I have driven and



walked around these sites and the wider surrounding area. In my judgement they appear to be in sustainable locations, being close to local centres, employment opportunities and schools, and within reasonable distance of the City centre.

81. *Whilst these sites have undergone initial sustainability appraisal showing no absolute constraints, they have been omitted from further assessment on the basis they are wholly or in part outside the JCS area in Stroud⁸¹. However, given the shortage of appropriate strategic housing sites around Gloucester, I am not convinced that this is a justified planning reason for rejecting these omission sites.”*

There are four options presented within the Issues & Options document. Before we explain why we consider that land at Whaddon (Option G2) should be favoured, it is important to note that these options are not mutually exclusive alternatives. Until the scale of housing need is known (comprising the objectively assessed need for Stroud District with the residual unmet needs from Gloucester City) then it is not possible to say whether one or all of the potential options are required. For this reason, we focus the remainder of these representations on the suitability, sustainability and deliverability of the land at Whaddon.

Land at Whaddon (Option G2)

The land south of Gloucester represents a highly appropriate and sustainable location for future growth. Indeed, the land represents a natural extension to the existing urban area. Figure A shows the boundary of the site in the context of the existing settlement and shows very clearly how the land fits into the present day settlement pattern.

FIGURE A – Aerial photograph



The following subsections summarise the studies undertaken to assess the development potential of the site.



i) Accessibility

An assessment has been undertaken of the accessibility and transport issues associated with a mixed use development containing 1500 dwellings within the area of search, to identify any issues that would need to be addressed as part of such a development scheme.

Public Transport

There are four bus services that pass within 400m (5 minutes walk) of the site, these services link the site with central Gloucester, Tuffley, Stroud, Nailsworth, Cheltenham, Brockworth and other destinations around southern Gloucestershire. These services could be extended or diverted into the development site in order to ensure good quality bus access for residents to a wide range of employment, leisure and retail destinations.

The approved Hunts Grove urban extension which is located between the A38 and M5, to the north of Junction 12 includes a reservation for a possible rail halt. Although there is still uncertainty regarding the exact nature and frequency of service at the rail halt it is clear that it would be easily accessible from Whaddon via Naas Lane or via the pedestrian routes set out below.

Walking and Cycling

The cyclist is well provided for within the urban area of Gloucester, with a significant number of on and off road routes linking most areas of the city. Dedicated cycle lanes adjacent to the site along Stroud Road provide links into safe routes to the city centre and other locations and facilities via a number of dedicated and signed routes. Furthermore, Gloucester is generally fairly level, with few hills to deter cyclists.

The development itself would incorporate a network of pedestrian and cycle routes throughout the site that would also link into the wider pedestrian and cycle network in southern Gloucester. Such on site facilities combined with improvements and links into the existing pedestrian and cycle network would mean that walking and cycling would be a viable alternative to the private car for shorter journeys such as trips to schools, local shops, the post office, library etc and longer journeys to the city centre.

A network of public rights of way exists between the site and significant employment opportunities offered by Waterwells Business Park to the south-west of the site.

Vehicular Access

The highway impact of a 1500 dwelling development at Whaddon has been tested using data from the Central Severn Vale (CSV) SATURN traffic model and other sources. The analysis has revealed that this level of development can be accommodated with certain alterations to local highway junctions. These junction improvements will accommodate the additional trips generated by the development and improve access to the site by foot and cycle.



In summary, the transport network associated with a 1500 dwelling development at Whaddon would offer residents and users of the development a real choice of mode of travel for work, leisure and shopping trips. Residents would not be reliant on the private car as alternatives would be available in the form of excellent bus services, easy access to rail services, and an excellent pedestrian and cycle network.

ii) Landscape Impact

Landform, Landscape Pattern and Vegetation

The site consists of large to medium sized, irregular shaped, gently rolling fields, with generally poor quality field boundary hedgerows and few trees. A small area of remnant orchard, with few trees, is located in the north-eastern corner of the site.

The site is low-lying land, between approximately 20 – 38m AOD. The lowest part of the site follows the watercourse which runs from the south-eastern part of the site to the western edge, crossing beneath the railway on the western boundary. The site is bordered by footslopes of higher land to the south (by the M5 motorway and further south), to the east (around Whaddon and east of the A4173) and to the north-east (associated with Robins Wood Hill).

To the north of the site is a residential area, Lower Tuffley which is part of south-east Gloucester, and to the north-east lies the small village of Whaddon with a school, farms and residential dwellings.

Landscape Planning Context and Landscape Character

The local authority boundary between Gloucester City Council (GCC) and Stroud District Council (SDC) runs across the north-western corner of the site. The northern land within Gloucester City has the benefit of outline planning permission for up to 250 dwellings.

Landscape and Visual Analysis

The site comprises gently rolling agricultural land, large fields with few and poor quality hedgerow boundaries and trees. The site is influenced by urban activity from the railway on the western boundary, Quedgeley further to the west, the city edge to the north, the A4173 to the east, Whaddon to the north-east and the M5 motorway to the south.

The site is visually enclosed by landform, the railway and the motorway and associated motorway planting. In landscape and visual terms, the site is unremarkable and suitable for development.

This conclusion is supported by the findings of the 'South West Draft RSS Urban Extension Evidence Base Review' (February 2007) prepared for the Regional Assembly on behalf of Ove Arup and Partners which states on Page A6 of the Appendix that *"with the exception of the Robins Wood Hill Special Landscape Area, the evidence base has not identified further environmental/landscape constraints"*. Indeed, the only constraint



to the area is the Special Landscape Area, which, contrary to the assertion in the Evidence Base Review, only covers a small section of Land Cell L. The remainder of this land is free from constraint and available for development.

iii) Green Infrastructure

The scale and form of land available for development is sufficient to enable the integration of green infrastructure and biodiversity corridors within the site. A key element of the green infrastructure is the route of Daniel's Brook, an area either side of which will be free from development to provide appropriate biodiversity habitats.

iv) Archaeology

A desk based archaeological assessment of the area has been undertaken which identified no features of historical or archaeological interest that should preclude this area from being allocated for development. The report recommended that a geophysical survey should be undertaken prior to development in order to establish the presence or otherwise of archaeological remains and our Client is committed to undertake this survey at the appropriate time.

In advancing development proposals for the site our Client would undertake to ensure that all appropriate and relevant measures were followed to avoid any detrimental impacts on archaeological interests should any be identified on the site. Furthermore, given the scale of the site and extent of our Clients' land interests, should any archaeological remains be identified within the land identified as an area of search for an urban extension, these features could be accommodated and incorporated into the development proposals without impacting upon the scale of development achievable.

v) Biodiversity

The land comprises predominantly improved grassland with relatively few field boundaries or other features of ecological value.

A previous biodiversity assessment concluded that the most important features in nature conservation terms would remain wholly or largely unaffected by the development of land in this area. On the basis of a number of recommended mitigation measures identified by consultant ecologists the development would not be expected to have a significant impact on the nature conservation resources of the area.

This is consistent with the surveys that were undertaken to inform the determination of the planning application on the land immediately to the north within Gloucester City.

Furthermore, opportunities exist for the enhancement of biodiversity within the site, in particular the section of Daniel's Brook and adjacent land. A mix of open space set within a green infrastructure network would facilitate significant biodiversity enhancement.



vi) Drainage

Site characteristics are such that Sustainable Drainage Systems may be readily implemented in accordance with national guidance and to ensure that flood risk is not increased in the catchment. Scoping discussions with the Environment Agency have informed the general drainage concepts that will be employed at the site.

Severn Trent Water has been contacted regarding the discharge of foul water from the development and have confirmed a likely point of connection on their system.

vii) Flood Risk

The proposed development land is bisected by Daniels Brook that is classified as a Main River. The Environment Agency's draft catchment framework management plan states "... no flooding has been recorded on the Daniels Brook since the relief channel and control structure were completed."

Daniels Brook is included on the EA Flood Zone mapping, which shows a relatively narrow corridor of both 1 in 100 year (1% AEP) and 1 in 1,000 year (0.1% AEP) flood risk envelope running through the site. Consequently, all but a small area of the site lies within Flood Zone 1.

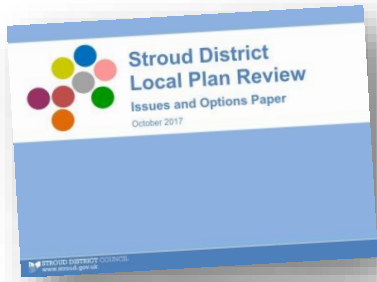
Given its location within Flood Zone 1, the site represents a preferred location for development when appraised in accordance with the Sequential Test as required by the Framework.

viii) Service Infrastructure

Initial enquiries show the site to be well placed on the local networks to be serviced without substantial upgrading.

Summary

The above analysis and work undertaken on behalf of HLM demonstrates both the suitability and deliverability of the urban extension to the south of Gloucester (Option G2). All the key considerations clearly indicate that the site is both an appropriate location for an urban extension and that there are no technical constraints. There are no other planning considerations which either contradict these conclusions or indicate that the site is not deliverable.



Stroud District Council is starting the process of reviewing the current Local Plan. This consultation is seeking views about the range of issues that the next Local Plan will need to tackle, and options for addressing them. This includes the identification of potential areas for growth and development. We ask a series of questions throughout the consultation document (each of which is numbered). Please refer to the question number and/or topic in your response, where relevant.

You can download a PDF or an editable electronic copy of this form from our website www.stroud.gov.uk/localplanreview. You will also find the main consultation document on this web page, as well as some supporting material and further reading. **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (Local Plan Review: Call for Sites).**

The consultation closes on Tuesday 5th December 2017. Please email completed electronic responses to local.plan@stroud.gov.uk or post paper copies to **Local Plan Review, The Planning Strategy Team, Stroud District Council, Ebley Mill, Westward Road, Stroud, GL5 4UB**. Should you have any queries, the Planning Strategy Team can be contacted on 01453 754143.

Consultation response form PART A

Your details

Thank you for taking part. Please fill out your personal information in PART A. Your contact details will not be made public and won't be used for any purpose other than this consultation. We will not accept anonymous responses. Your comments may be summarised when we report the findings of this consultation.

Your name

(title): <input type="text"/>	name: <input type="text"/>
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Your company name or organisation (if applicable)

Savills

Your address (optional)

Embassy House Queens Avenue Bristol BS81SB

Your email address *

<input type="text"/>

Your phone number (optional)

<input type="text"/>

If you are acting on behalf of a client, please supply the following details:

Your client's name

(title): <input type="text"/>	name: <input type="text"/>
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Your client's company or organisation (if applicable)

Hallam Land Management

Keeping you updated:

Would you like to be notified of future progress on the Local Plan review? (* we will do this via email)

- | | | | | | |
|------|--|------------|-------------------------------------|-----------|--------------------------|
| i) | When the findings from this consultation are made public | Yes please | <input checked="" type="checkbox"/> | No thanks | <input type="checkbox"/> |
| ii) | The next formal round of public consultation | Yes please | <input checked="" type="checkbox"/> | No thanks | <input type="checkbox"/> |
| iii) | No further contact please | | <input type="checkbox"/> | | |

Consultation response form PART B:

If you have several different comments to make, you may wish to use a separate PART B sheet for each one (although you do not have to). If you use multiple PART B sheets, please make sure you fill in your name on each of them (you only have to fill out PART A once, as long as it is clearly attached to your PART B sheets when you submit the forms to us).

Your name

Your organisation or company

Your client's name/organisation
(if applicable)

The consultation is seeking views about whether the big issues identified within this paper are the right things to focus on and what options exist for tackling them. Are there other issues, options or opportunities that have been missed? **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (download a copy of the sites form at www.stroud.gov.uk/localplanreview).**

We ask a series of questions (highlighted in pink boxes) throughout the consultation paper. Each of the questions is numbered. Please can you reference the question number(s) and/or the topic here:

Question number: 3.1 and 3.2

Please use this box to set out your comments:

(Attach additional sheets of paper or expand this box if you need to)

See Attached Statement.