

**ON BEHALF OF REDROW HOMES (SW) LTD**

**REPRESENTATIONS TO STROUD DISTRICT  
COUNCIL'S PRE-SUBMISSION DRAFT LOCAL  
PLAN**

**IN RESPECT TO LAND NORTH OF CHARFIELD  
ROAD, KINGSWOOD**

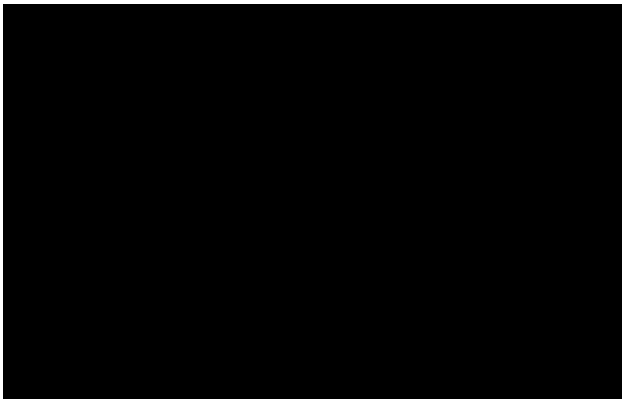
**July 2021**



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LOCAL PLAN**

**IN RESPECT TO LAND NORTH OF CHARFIELD ROAD, KINGSWOOD**



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## 1.0 INTRODUCTION

1.1 On behalf of Redrow Homes (SW) Ltd and the landowners, Grass Roots Planning have been instructed to prepare and submit representations to Stroud District Council's Pre-Submission Local Plan (Regulation 19) consultation, currently taking place until the 21<sup>st</sup> July 2021. This is with particular reference to land north of Charfield Road, Kingswood, which is being promoted by Redrow Homes for development.

1.2 This document sets out our concerns to the emerging Stroud Local Plan and the strategy it contains. The focus of these concerns relates to the fact that the strategy relies too heavily on strategic-scale sites, with those selected not underpinned by robust evidence to demonstrate why they are the most sustainable and viable options to accommodate housing growth. Our concerns also remain that the reliance on these sites will result in the council being unable to be demonstrated a five-year housing land supply (5YHLS) in the early years of the plan.

1.3 As part of this document, we will set out how we consider the emerging plan fair when considered against the tests of soundness that are set out in paragraph 35 of the NPPF (July 2021) which are as follows:

- a) **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.4 In addition to our main concerns that the plan is relying too heavily on strategic-scale sites, we also question whether the distribution of housing is sound. For example, there is only a single housing allocation for 50 dwellings within the Wotton cluster which provides a significant existing concentration of employment, resulting in a high level of in-commuting into the area. This seems to go against the very premise of the strategy set out for this area which states that the aim of the Local Plan is this regard is:

*'improving access to jobs, services and facilities in the south of the District, to boost local sustainability and community vitality'.*

1.5 In our view a single allocation in this area will not result in a better balance of jobs and homes given the extensive employment allocation proposed at Renishaw, and will simply exacerbate issues relating to in-commuting to this location instead of providing opportunities for those to live in this area and commute to work via walking and cycling.

1.6 As such, it is our view that there should be an increased level of housing provision in the south of the district to provide opportunities for people to live and work in the same location to address this key issue. Given AONB constraints that affect Wotton-Under-Edge we consider that the best location for additional growth in this area would be Kingswood, as this settlement gives direct and sustainable access to the large concentration of jobs that is provided at Renishaw, and the connected additional employment allocation that is coming forward here. Growth in this location is also well-related to strategic levels of employment at Thornbury and Bristol.

1.7 We are specifically promoting a site for future allocation in the Local Plan at land north of Charfield Road, Kingswood (the site) to provide circa 300 homes, a two-form entry primary school and extensive formal parkland. This could provide a suitable replacement site if existing proposed allocations are found to be unsound, or deliver a broader portfolio of sites if required, or housing numbers need to be increased across the district.

1.8 The land at Kingswood and the proposals for it are set out in the accompanying documents listed below. In addition, a series of technical assessments have been undertaken in support of the development proposed and to inform the masterplan for land north of Charfield Road and these should be read in conjunction with this statement:

- **Appendix A** – Site Location Plan
- **Appendix B** – Emerging Concept Plan
- **Appendix C** – Access Plan & Technical Note in respect to scope for new Public Transport
- **Appendix D** – Landscape Strategy
- **Appendix E** – Heritage Listed Buildings Settings Assessment
- **Appendix F** – Scoping Report Flood Risk & Drainage Strategy
- **Appendix G** – Preliminary Ecological Appraisal
- **Appendix H** – Odour Report

- **Appendix I** – School Capacity Report
- **Appendix J** – Previous Additional Housing Options Consultation Representations (December 2020)

1.9 We have previously submitted representations on behalf of Redrow Homes to the 'Additional Housing Options' consultation undertaken in January 2021 which included technical work to demonstrate the site's deliverability. However, having reviewed the latest evidence and documents produced by the Council it does not appear that any consideration has been given to this alternative site and the evidence presented at that time; therefore, we are concerned over the lack of an iterative process in this regard which we will go onto discuss in more detail within this statement.

1.10 We note that during both the Environment Committee & the full Council meeting, motions were put forward to remove the strategic allocation at Wisloe and replace this with Moreton Valence. This appeared to be voted in favour of but then a second vote was undertaken to publish the Plan as agreed without this amendment. The minutes of this meeting are not particularly clear and therefore there appears to be a lack of transparency in this decision-making process. It appears that both strategic allocations at Wisloe and Sharpness remain within the Pre-Submission Local Plan, both of which we have serious concerns over as we have set out within our previous representations and will expand upon in this statement.

1.11 The overreliance on strategic scale sites will have a certain impact on the delivery of homes within the earlier stages of the plan as we will go on to set out, however, given the questions raised over their commercial attractiveness and viability, there is also concern as to whether they will deliver the scale of housing currently anticipated at all. A broader and more diverse portfolio of land should be allocated, of varying sizes, to deliver homes and other development over the next five years and beyond; this should include allocating land at settlements such as Kingswood to support the southern cluster of settlements here and the affordable housing needs that will arise.

1.12 Our evidence is set out in the following sections:

- **Section 2** – Housing Requirement
- **Section 3** – Concerns over Specific Allocations
- **Section 4** – The impact on Five-Year Housing Land Supply
- **Section 5** – Land north of Charfield Road, Kingswood
- **Section 6** – Conclusions

## 2.0 HOUSING REQUIREMENT

- 2.1 During the previous stage of consultation relating to the Additional Housing Options (AHO) paper, it was noted that the Ministry for Housing, Communities and Local Government (MHCLG) were intending to make changes to the Standard Method for Calculating Housing Need ('the standard method'), which would have resulted in a higher annual housing need figure of 786 per annum (15,720 over the 20-year plan period). We commended SDC for taking this positive approach to housing delivery.
- 2.2 However, we note that MHCLG has now abandoned these plans and therefore SDC have reverted back to the original housing requirement of 630 dwellings per annum (12,600), with additional provision to meet Gloucester's needs.
- 2.3 Paragraph 010 of the PPG recognises that *'the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates'*.
- 2.4 Therefore, we have reviewed whether there may be any other circumstances which warrant an increase in overall housing provision.
- 2.5 We have had regard to the Gloucestershire Local Housing Needs Assessment (LHNA) published in August 2020 which identifies that there is an overall unadjusted need for affordable housing of 424 dwellings per annum (8,480 homes over the plan period).
- 2.6 As set out in the Plan, this would require a high level of affordable housing to be provided across individual sites in order to achieve this level of development, which was demonstrated not to be viable, which is a reasonable assumption.
- 2.7 However, the current provision set out in the Plan would only deliver up to 3,810 affordable homes, and that relies on 30% affordable housing being delivered across every site, which it is clear from the viability evidence provided, that this won't be achievable. This is less than half of the unadjusted affordable need identified; as such, we question whether a higher level of housing should be delivered across Stroud (over and above the minimum required in the Standard Method) to address a greater level of affordable housing need as a potential option for the Plan.

### 3.0 THE SPATIAL STRATEGY

#### Overreliance on Strategic Scale Sites

3.1 Within our previous representations to the AHO Consultation (Appendix J), we set out our concerns in relation to the level of homes coming forward in on strategic-scale sites, which may require significant infrastructure to be delivered. Since this time, the housing requirement has reduced and the number of homes on some of the strategic sites has increased. As such, the table is now as follows:

Strategic sites ▼	Number of dwellings at each
Cam North West	900
Cam North East Extension	180
South of Hardwicke	1,350
Hunts Grove Extension	750
Sharpness Docks	300
Sharpness	2,400 (5,000 by 2050)
Stonehouse North West	700
Wisloe	1,500
Local sites at smaller settlements ►	985 (cumulative)
<b>Total</b>	<b>At least 9,065</b>

Figure 1. Extract of Proposed Housing Delivery on Strategic Sites

3.2 This equates to 8,080 dwellings, equivalent to 64% of the total housing requirement of 12,600 homes, 52% of the total number of dwellings anticipated to come forward (15,555 homes once existing commitments are taken into account, which incidentally also rely on strategic sites) and makes up 78% of the allocations and windfalls proposed as part of this new Local Plan (8,080 dwellings out of 10,340 coming forward). This also does not take into account the proposed allocation at Whaddon (2,500 dwellings) to meet the needs of Gloucester City. This is an extremely high proportion of overall growth and in our view represents an acute over-reliance on such sites.

3.3 We have reiterated our table from paragraph 4.9 of our previous representations to highlight the stark difference with other authorities in the region which have a much lower proportion of strategic allocations, as shown below in table 1:

Table 1. Comparison of proportion of strategic-scale allocations in other authority areas

	Stroud Local Plan Review (2019 draft plan)	Cotswold District Council (2011 – 2031)	South Gloucestershire Council (2006 - 2027, adopted in 2013)	Tewkesbury, Cheltenham & Gloucester Joint Core Strategy
Housing Need	12,600	8,400	28,355	35,254
Total Supply	15,555	9,614	28,850	31,824
Number of dwellings from Strategic Allocations (over 500 units)	8,080	1,800	10,400	11,400
<b>% of Total Supply</b>	<b>52%</b>	<b>19%</b>	<b>36%</b>	<b>36%</b>

- 3.4 SDC are therefore relying far too heavily on strategic sites to come forward in a timely fashion to deliver the housing required, as well as ensuring that there is a robust 5YHLS. Evidence to date has demonstrated that this is difficult to achieve, as we go onto discuss in the next section.
- 3.5 With consideration of the table above, it is clear that the number of strategic allocations proposed is significantly higher than nearby authorities. South Gloucestershire Council and the Tewkesbury, Cheltenham and Gloucester authorities whose strategic allocations make up 36% of their overall supply, far lower than Stroud's, have repeatedly been found unable to demonstrate a five-year housing land supply of sites.
- 3.6 A broader portfolio of sites is required to achieve a balanced range of site sizes and types, which will allow development to come forward early on in the plan period, including the provision of affordable housing. Currently, we consider that the plan will fail to meet paragraph 60 of the NPPF (July 2021) which requires '*a sufficient amount and variety of land can come forward where it is needed*'.
- 3.7 Without the removal of some of the strategic sites (such as Sharpness and Wisloe, which we discuss in detail below), and their replacement with a more suitable range of site sizes, we consider that the strategy set out under policy CP2 of the emerging plan is unsound.



## Concerns over Specific Allocations

### Sharpness

- 3.8 We will not seek to repeat our concerns in full, but would direct the Council and the Inspector to paragraphs 4.26 – 4.37 of our representations to the AHO Consultation, which are available in Appendix J of this submission. We have further expanded on some specific points and evidence which has come to light since the previous representations were submitted.
- 3.9 As set out, our primary concern in relation to this site is its unsustainable location, and the potential infrastructure costs that are highly likely to be required in order to make it accessible, which in our view renders the proposals unviable and undeliverable. The starting point is to assess the existing sustainability credentials of the site, and then, if the site is unsustainable, whether there are reasonable and credible mitigation options to make it accessible in transport terms.
- 3.10 Our concerns are supported by Stagecoach and we have previously referenced their statements specifically within our representations, so we do not seek to repeat these again.
- 3.11 Aside from the fact that the site is an unsustainable settlement for strategic-scale development, we have concerns over the mitigation proposed and the reality of this providing a reasonable choice of alternative transport modes to the private car.

### *Transport*

- 3.12 Since the previous submission, a range of documents have been published by the promoters which have been prepared by Stantec, including a document entitled '*Sharpness Vale – Mobility-as-a-Service and Express Coach Services*', which is a strategy, viability and funding appraisal (March 2021).
- 3.13 The document focuses heavily on 'Mobility as a Service' or 'MaaS', which essentially looks to the future and how changes in our working patterns and technology means that we are no longer reliant on more 'traditional' transport provision, such as bus services, and more like to focus on on-demand transport that groups riders together. MaaS is an app service which seeks to combine all available transport services within that area and provide the user with a 'joined-up' experience in taking public transport and other modes of sustainable travel. Second to this is the provision of a bespoke bus service with operator Zeelo, and a bespoke railway service.

3.14 Stantec's report states that the proposals are 'good value-for-money' for a subscription to a MaaS service, however, the comparison costs and take-up are related to very large cities, such as London, Gothenburg, Helsinki and Birmingham. These areas all have a very high concentration of people within a more limited geographical location that provides opportunities for significant patronage, compared to a very rural location such as Sharpness where there is no significant existing demand to underpin such a service and houses are unlikely to be delivered for at least 10 years. Put simply, it is unrealistic to expect sustainable transport providers such as Car Club, Uber, E-Scooters, etc. to set up a business where there is no case to do so, due to a lack of demand – all MaaS does is collate the existing services which are extremely limited. Second to this, is that the comparison of costs again relate to large cities where wages are much higher when compared to a rural area of Gloucestershire, such as Sharpness and its hinterland. The costs cited would be relatively unaffordable for residents in this location based on local wages, particularly if the variety of transport options promised are not available. We do not consider that this presents a real 'value-for-money' option.

3.15 Further to this, we note that the documents state '*at present, the Sharpness Vale promoters have not formed a partnership with a MaaS operator, as it would make sense to do this once the commencement of the development is closer*'. Whilst we appreciate there are 'unknowns' relating to the development, this is concerning, particularly given that the infrastructure for the development needs to be planned for early in advance for it to work. This does not comply with the Garden City Principles which states that it should provide '*integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport*'. There is no commitment from the various transport providers of car club, electric scooters, etc., that this will be delivered at Sharpness nor is there any commitment to MaaS from the developers of the site.

3.16 As such, at the present time, it is highly likely that Sharpness would be reliant on the provision of the proposed Zeelo bus service and the railway service. On page 16 of the Stantec document, it noted that '*there will be a need to pump-prime the service at the outset*', however there is no commitment from the promoters that they would fund this nor is there any developer committing to this cost. There are serious concerns with this approach which are as follows:

- There is no existing demand or provision that can be synergised with – therefore any costs associated with developing a bus service in this location will be very expensive, and less relevant or attractive to an operator, given the remoteness of the location;

- This will cause a significant gap between cost and revenue particularly in the early stages of the development, and there is no clear vision for who will be funding this gap and who has committed to the guaranteed delivery of this service;
- There is some suggestion that households will pay a management fee towards the costs of public transport – this does not support the Garden Village principles of 'land capture value for the whole community' and there is no assessment of what that cost might be and whether it may affect viability and hence the delivery of policy compliant levels of affordable housing;
- The anticipated assumptions made on the modal share between buses and coaches is extremely high compared to even inner London when they anticipate only having a single choice of departure time and a single return time to one destination – this does not provide a real choice of transport options and the level of patronage will be far more limited; and
- Local bus enhancements are not costed at all.

3.17 Our view remains therefore that the costs of providing a sustainable transport solution for this site have not been rationally considered and will not result in realistic alternative transport options other than the private car.

3.18 The Infrastructure Delivery Plan (IDP) states that '*consultation with GCC Highways highlighted the reliance on the PS36 New settlement at Sharpness providing a high level of trip internalisation. It is therefore vital that supporting infrastructure, such as shops and services, are provided in a timely fashion to minimise out-commuting and reduce pressure on the surrounding highway network*' (page 28). As such, it is concerning to note that the trip analysis relies on the local centre being delivered early on in the process and the impact on the highways network may be even more severe than anticipated. In our view, the alternative transport solutions offered are not realistic and credible options given the lack of commitment to pump-prime the services envisioned and the fact that revenue will be extremely low within at least the first 10 years of the delivery of housing in this location.

3.19 Whilst the Zeelo bespoke service is a good aspiration, it is not realistic and needs to be supported by a traditional bus service that links in with it and connects residents between smaller areas to allow accessibility for all. The service claims to 'unashamedly target commuter traffic' – what would be much simpler is to place development in locations which can more easily and readily be made sustainable, in close proximity to existing employment areas and facilities, such as Kingswood. Further to this, it does not consider the proportion of the population that may be less able and / or rely on public transport to get around on a day-to-day basis.

- 3.20 With respect to the railway line, we note that this is anticipated to be a 'bespoke service' too, yet there is limited to no evidence from Network Rail that they support the delivery of a new railway line in this location, contrary to the promoter's submissions. Whilst there has been an application for funding for a full business case, it remains to be seen what the actual costs of developing the railway line are, and whether the promoter is willing to fund it without it resulting in this being passed on to the cost of the individual, i.e. those buying homes in the future. At the current time therefore, we fail to see how it remains as a credible option for providing an alternative means of travel to the private car, as it has in no way been costed and the results of such a costing fed into a viability assessment. Therefore, the current strategy simply hopes for the best without any reliance on actual data and evidence.
- 3.21 This was noted in the Gloucestershire Rail Investment Strategy (March 2020) which states that *'whilst the reopening of the line could provide sustainable transport to Sharpness and enable significant growth in the area, analysis shows a very limited GVA impact for a very costly new piece of infrastructure. This was also reflected in the comments from Network Rail and GCC Highways'* (page 29). Whilst there is some reference to the Sharpness Branch, it is clear that the initiative is driven by the desire to 'support significant new development around Sharpness'. The introduction of the new line provides no benefit nor improves the service for the existing population, and only seeks to accommodate the new homes, thereby resulting in a significant cost benefit. This does not demonstrate deliverability of a sustainable location for growth.
- 3.22 An alternative would be to allocate land where infrastructure has already been costed and planned for, which development could seek to enhance and leverage off, or locate development where the need to travel to access employment and other facilities is not so acute.
- 3.23 In light of the above, we do not see how realistic and informed transport options have been put forward to ensure that there will be a realistic alternative to the private car once Sharpness begins to deliver housing. Our concerns are two-fold: first, that this will result in reliance on the private car which will in turn adversely effect air quality and CO2 emissions, meaning that the Strategy fails to meet the requirements of the Climate Change Act; and second, that this will result in viability and delivery issues for the site, resulting in a reduction in affordable housing or other infrastructure delivery.

## Viability

3.24 Within our previous representations we noted some viability concerns over Sharpness set out within the Local Plan Viability Assessment (May 2021), the following has been noted:

- At both Wisloe and Sharpness premiums have been applied to the potential sales values to account for the fact that they will both follow the 'Garden Village' principles; it also relies on the proximity of Bristol as a market to justify these values. However, the fact remains that the location is not market tested and the values adopted are aspirational. They do not, for example, test a more conservative scenario such as values closer to those prevalent in the area. However, despite the increased premiums, there are still concerns with Sharpness as a viable option for development, with the Viability Assessment indicating that there are 'challenges' with this area (paragraph 12.88 of the assessment). These viability concerns must be given serious thought due to the level of affordable housing that is expected to be delivered here as a consequence of the overall scale of the development. If it does not achieve this, then the council's strategy for addressing affordable housing need becomes uncredible, even based on their acceptance that the full level of assessed need will not be met by the plan.
- Table 7.2 sets out the initial strategic infrastructure and mitigation costs for Sharpness, this was anticipated to be £61 million (averaging at £28,596 per qualifying household) in the May 2020 paper. Within the new paper (May 2021), this has suddenly decreased to £42 million therefore lowering it to £17k per dwelling, with no detailed explanation as to why this has occurred. Further to this, it does not provide any allowance for additional pump-prime funding for the first few years of the bus service required to make it a sustainable location for commuters.
- Paragraph 12.74 states *'the infrastructure cost for the Strategic Sites (as set out Chapter 7 above) is about £20,000/unit. On these sites, viability is constrained, with none of them being able to deliver 30% affordable housing and £20,000/unit.'* The results of this is that the Viability Assessment recommends that the Council engages with the owners of the Strategic Sites to determine whether this level of contribution can be sought.

3.25 In conclusion, the Council's own viability work highlights significant concerns in respect to the viability of these locations, even based on the unrealistically high sales values that have been adopted and the dramatic and unevidenced reduction in assessed infrastructure costs. The report requires that the owners of the Strategic Sites should provide detailed evidence to

demonstrate that the 30% affordable housing requirement can be achieved alongside the costed infrastructure – to date, we can find no clear or concise report which describes this.

#### *Agricultural Land Quality*

- 3.26 Based on the provisional Agricultural Land Classification Maps from Natural England, the majority of Sharpness lies within Grade 3 agricultural land – it is unclear whether this is considered to be 'Best and Most Versatile'. There is no evidence to confirm this but if the land is Grade 3a or above, this would result in a significant proportion of BMV land being removed, contrary to national guidelines. This is being determined at a stage where reasonable alternatives existing to provide the development necessary to meet the housing requirement over the plan period.

#### *Transport*

- 3.27 The Infrastructure Delivery Plan (IDP) March 2021 identifies on pages 26 – 28 the package of highway mitigation measures that will be required in response to the allocation of land at Berkeley, Sharpness Docks, Focus School, and the new settlement of Sharpness. The junction improvement schemes identified are set out in the table below, alongside the costs associated with delivering them (taken from the Traffic Forecasting Document) – unless they are considered unfeasible, then the reasoning for this is given instead.

*Table 2. Highways Mitigation Required to support Sharpness*

Conversion to signal control with flare extension on B4066 approach	A38 / B4066	£250k - £2.5m
	A38 / Breadstone	This will be addressed via the improvements to the A38 / B4066 junction. Mitigation to this junction is considered inappropriate due to the nature of the road.
Addition of Traffic Signals, with flaring provided on A38 southbound approach	A38 / B4066 Berkeley Road	£250k - £2.5m.
N/A	A38 / Stone	No highways improvements are proposed despite the fact that the junction would exceed capacity during the AM peak and large increases in southbound demand.

		It states that mitigation is unlikely to be appropriate due to the minor nature of the road.
Signalisation of existing three-arm give-way junction, with widening on Alkington Lane approach.	A38 / Alkington Lane	£250k - £2.5m. It should be noted that these mitigation measures would require land acquisition either side of Alkington Lane, as such, costs are likely to be the higher end of the spectrum and currently it is unknown if this mitigation is deliverable.
Limited widening on B4066 eastbound approach to existing roundabout	B4066 / Station Road	Low and very low cost schemes (likely to be under £250k)
Removal of existing hatch marking and potentially minor carriageway widening on northbound A38 approach	A38 / A4135	Low and very low cost schemes (likely to be under £250k)
N/A	A38 / Wick Road	No mitigation measures are proposed given the nature of Wick Road, despite it being assessed as exceeding capacity in the PM peak.
Introduction of traffic signal control	B4066 / Alkington Lane	£250k - £2.5m

3.28 This level of mitigation is required even assuming a high level of trips being internalised within the promoters' model, as highlighted by GCC and referenced in paragraph 3.18 of this statement. The IDP itself recognises that *'the proposed allocations as PS34 Sharpness Docks and PS36 New settlement at Sharpness have an issue of relative remoteness in public transport terms. This increases demand for private car usage'*, which calls into question whether the assumptions about high levels of internalisation are reasonable.

3.29 A simpler solution would be to allocate land that is more accessible, particularly in respect to employment opportunities, which is already located on existing transport corridors and where bus operators consider that a reasonable business case could be made for improving and

extending the services in this location, that would avoid significant infrastructure funding being required. It is unclear at this stage whether the Highways Authority or Highways England would issue a holding direction in respect to the delivery of Sharpness until such mitigation has been secured and implemented; if they would, then that would add to the need to deliver most of these significant improvements upfront, thereby exacerbating the viability issues identified in respect to these sites and resulting in significant delays to the delivery of homes, failing to boost supply in the shorter-term.

#### *Other Concerns*

- 3.30 We have previously raised other concerns regarding the allocation of land at Sharpness, however we note in the IDP that it states *'the Sharpness Garden Village would also likely have significant recreational impacts on the designated sites. These impacts may go beyond those assessed within the existing Severn Estuary Recreation and Mitigation Strategy and further work is required to understand implications and to develop appropriate mitigation'* (page 94). Given that the Severn Estuary Recreation and Mitigation Strategy does not account for additional growth in this location, it is highly likely that further work will be required to update this plan to ensure recreational impacts do not breach environmental legislation. It is unclear whether this will result in further delays to the delivery of Sharpness without a mitigation strategy in place, and whether such mitigation would add to infrastructure costs.

#### *Conclusions on Sharpness*

- 3.31 As set out, we consider that the first step in the preparation of the plan should have been to assess the baseline situation of a site's location and whether it has the ability to accommodate significant development in terms of accessibility. In our view, Sharpness is not an appropriate location for significant growth given the adverse impact this would have on the highways network which already optimistically assumes high levels of internal trip generalisation – therefore, the full impact may not be realised.
- 3.32 This reflects the conclusions found during the previous Local Plan preparation where the site was dismissed, with the Council at the time stating: *'whilst Sharpness has the theoretical capacity to achieve this scale of development (and more), it is relatively remote from the main employment centres and primary facilities and services in the District, would require significant new infrastructure and has flood risk and landscape impact issues'* (page 22 of CDF15 'Towards a Preferred Strategy, Pros and Cons of Potential Locations for Strategic Growth').



- 3.33 The transport mitigation set out for the site does not appear realistic, it has not been properly costed and the funding to deliver it thought through. We do not consider it to be a credible option for alternatives to the private car; development at Sharpness will simply exacerbate issues of commuting to Bristol and other key locations within the Stroud area. Further to this, it appears that the promoters of the site have not considered the development in a holistic manner by ensuring that all would be able to access public transport – it simply focuses on commuters and not those that may need to travel between smaller locations. It cannot meet the needs for those travelling to smaller destinations because there is no credible business case for local bus services in this location as Stagecoach have highlighted. This is a significant adverse issue against its allocation for the scale of development proposed.
- 3.34 Reliance is placed on a railway scheme which has no funding secured for its delivery and no full business case developed. Therefore, the costs of re-introducing the line are extremely unclear and it does not currently have the support of Network Rail, or any other rail operator in the area.
- 3.35 It would be far more logical to place development in a location where concentrations of employment opportunities already exist, key facilities are available and within transport corridors which are already, or can be made, sustainable through reasonable levels of investment. In comparison, land at Sharpness will rely heavily on pump-prime funding; government investment; and / or will result in individuals having to pay (i.e. through increased house prices, ongoing management fees or significant public transport fares). As such, we do not consider it to be a sound and reasonable location for development and instead land should be allocated at more sustainable settlements such as Whitminster (for strategic-scale development) and Kingswood (non-strategic development).

### **Wisloe**

- 3.36 We set out our primary concerns regarding these allocations in paragraphs 4.1 – 4.25 of our representations to the AHO consultation earlier this year, a copy of which is available in Appendix J of this statement. Since that consultation stage was completed additional evidence has now been produced by the promoters (GCC and Ernest Cook Trust Ltd) of the allocation at Wisloe which forms part of the evidence base to the Local Plan; this covers matters in respect to agricultural land classification, ecology, heritage, highways, flood risk, landscape and noise. Our comments are made below following a thorough review this information.

#### *Agricultural Land Quality*

3.37 After raising initial concerns in respect to this matter, on the evidence provided that the land is Grade 3B agricultural land, we can now accept that there would be no conflict with national planning policy in respect of this issue.

#### *Highways*

3.38 With respect to highways, the following infrastructure requirements are noted:

- A new bridge over the Railway line;
- New pedestrian / cycle link across the motorway, which would need to span over 6 lanes of motorway traffic and hard shoulders; and
- Public transport strategy options including the extension / diversion of services 60/61 into the development; provision of a new service; and provision of bus priority infrastructure.

3.39 It is unclear whether the promoters of the site have costed these pieces of infrastructure and whether they are incorporated into the viability appraisal work undertaken by HDH. Again there is the potential issue that Central Government investment and pump-priming funding will be required in order to make the proposals accessible and deliverable; without these significant pieces of infrastructure delivered it is clear that the proposals would not be sustainable in accessibility terms and given the need to offer future residents the realistic of travel options without the need for the private car.

3.40 It is also interesting to note that the highways assessment prepared in support of the allocation at Wisloe does not look at cumulative impacts on the network from additional trips generated by this site and the nearby allocations in Cam and there is no evidence to demonstrate that this will not cause significant adverse effects on the road network from the provision of over 3,000 dwellings in this general location. Given that the allocation of these sites will predominantly affect the same junctions, in our view it is important to establish whether any mitigation is required up front and whether this will have an impact on delivery in the front end of the plan period.

#### *Noise*

3.41 A noise assessment has now been undertaken by Acoustic Consultants Ltd on behalf of the promoters for Wisloe. This has identified serious noise concerns with the site, as the extracts below show which are taken from the noise reports prepared:

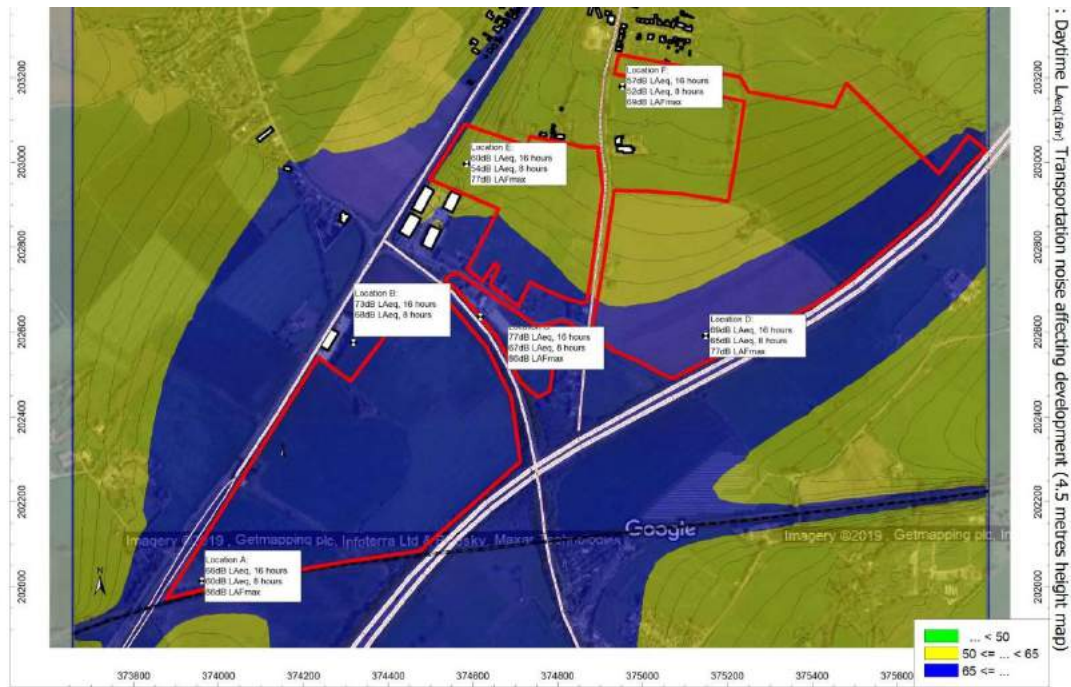


Figure 2. Baseline Noise Assessment results

- 3.42 As a result, the noise assessment recommends that windows would need to remain closed to resolve noise issues at the site. This in turn, can lead to either requirements to incorporate mechanical ventilation (and therefore an increased cost to the developer) or windows would have to be closed, resulting in overheating of a property and requirements to cool it. It is unclear whether this has been considered in the design and layout of the scheme.
- 3.43 Some consideration has been given to garden areas within the noise report but it appears no detailed layout has been prepared, which does not allow the assessors to adequately consider this issue.
- 3.44 As such, there remains a concern over the significant noise levels at the site which appear to sterilise a significant proportion of the land; we therefore question whether 1,500 dwellings are deliverable in this location without significantly adversely affecting the amenity of future residents.

#### *Conclusions on Wisloe*

- 3.45 Our previous concerns set out in our representations to the AHO consultation still remain, particularly the lack of a cumulative assessments on transport impacts and how noise will seriously inhibit the delivery of housing and make future amenity issues unavoidable. The additional technical evidence to date has not alleviated our concerns with respect to viability, deliverability and some technical aspects of the scheme.

- 3.46 This includes the initial baseline landscape work which identifies the key corridors to be retained and remain free from development – this evidence base, coupled with the other work undertaken, sterilises a large proportion of the site and we question whether 1,500 dwellings can actually be delivered at an appropriate density in this location. If 1,500 dwellings cannot be achieved we fail to see what the site would act as a sustainable, standalone Garden Village proposal.
- 3.47 In our view, the allocation of land at Wisloe should be removed and instead replaced with strategic-scale development elsewhere, such as Whitminster, and supported by smaller allocations such as land north of Charfield Road, Kingswood. This will broaden the portfolio of the type of sites being put forward and provide growth in the southern part of the district, which has practically no development proposed to meet housing needs arising in that area.

#### 4.0 THE IMPACT ON FIVE-YEAR HOUSING LAND SUPPLY

4.1 As set out within our representations to the Additional Housing Options Paper in January 2021 (a copy of which is available in Appendix J), we have serious concerns over the proportion of growth that is anticipated to come forward from strategic sites within the new Local Plan. This is set out in paragraphs 4.6 – 4.13 of our statement so we will not repeat our discussions in full; however, our primary concern is the ability for these sites to deliver homes early on in the plan period and the effect that this will have on five-year housing land supply (5YHLS). We have undertaken further investigation on this matter with respect to the Delivery & Trajectory set out in Section 7 of the Pre-Submission Local Plan, as well as the existing 5YHLS paper published in November 2020. This takes into account our concerns with the specific allocations raised in the previous section of this statement.

4.2 We have reviewed the most up-to-date 5YHLS paper which includes existing commitments and the remaining current Local Plan allocations which are yet to deliver homes (this does not make any allowance for future allocations such as those in the emerging plan coming forward). We note that the Council currently anticipate the following trajectory over the next 10 years without any new sites coming forward:

Year	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
<b>Deliverable Supply</b>	779	1,045	944	857	752	654	511	259	255	227

Figure 3. SDC's Estimates of Deliverable Sites between 2020 – 2030

4.3 It should be noted that the above figures already include the Hunts Grove Extension site and Sharpness Docks, both of which are allocations being carried forward from the previous plan, which highlights the fact that some sites in the area have taken circa 10 years since they were first earmarked for growth and over 6 years since they were formally allocated, with neither ready to deliver housing. The above figures do not make any allowance for the non-delivery of sites and assume that all commitments and allocations will be delivered.

4.4 Based on the above figures, we have calculated the rolling 5YHLS position below. This is calculated by adding up the anticipated delivery over five years (rolling forward each year) and dividing this by the annual requirement including a 5% buffer (e.g. for April 2022 add the number of homes coming forward through years 22/23 to 26/27 together (3,718 homes) and divide by 662 ( $630 \times 5 = 3,150 + 5\% \text{ buffer} = 3,308 / 5 = 662$  homes per annum)):

Year	Five-Year Housing Land Supply Calculation
2020	6.6
2021	6.4
2022	5.6
2023	4.6
2024	3.7
2025	2.9

Figure 4. Estimates of Rolling 5YHLS Calculation based on existing commitments and allocations in the 2015 Plan

4.5 As such, by 2023, Stroud District Council would not be able to demonstrate a five-year housing land supply based on their existing commitments and allocations in the current Local Plan and therefore allocations within the new Local Plan need to be coming 'on stream' by this time, to plug the gap and ensure that there is an adequate supply of new homes.

4.6 We note the trajectory set out in Table 6 of Section 7 of the Pre-Submission Plan (extract shown below for ease of reference) aims to show how housing delivery will be front-loaded and a five-year land supply achieved throughout the early parts of the plan period as follows:

Source of housing supply	Projected delivery				Total supply
	2020 to 2025	2025 to 2030	2030 to 2035	2035 to 2040	
Commitments (2019)	3,840	755			4,595
Cam North East Extension		50	130		180
Cam North West	200	700			900
Hunts Grove Extension	166	550	34		750
Sharpness Docks	110	112	78		300
Sharpness new settlement		500	750	1,150	2,400
Stonehouse North West	100	375	225		700
South of Hardwicke		600	600	150	1,350
Wisloe new settlement	50	565	660	225	1,500
Local development sites	116	290	290	289	985
<b>District Total</b>	<b>4,582</b>	<b>4,497</b>	<b>2,767</b>	<b>1,814</b>	<b>13,660</b>
Small sites windfall	150	375	375	375	1,275

Figure 5. Extract of Table 6 showing anticipated delivery of housing in Stroud

4.7 We have analysed whether the trajectory is realistic based on the Lichfields 'Start to Finish' Paper: Second Edition, published in February 2020, which provides a useful analysis of timeframes for a different range of applications of varying sizes.

4.8 Lichfield’s analysis indicates the following in respect to timeframes:

Figure 4: Average timeframes from validation of first application to completion of the first dwelling

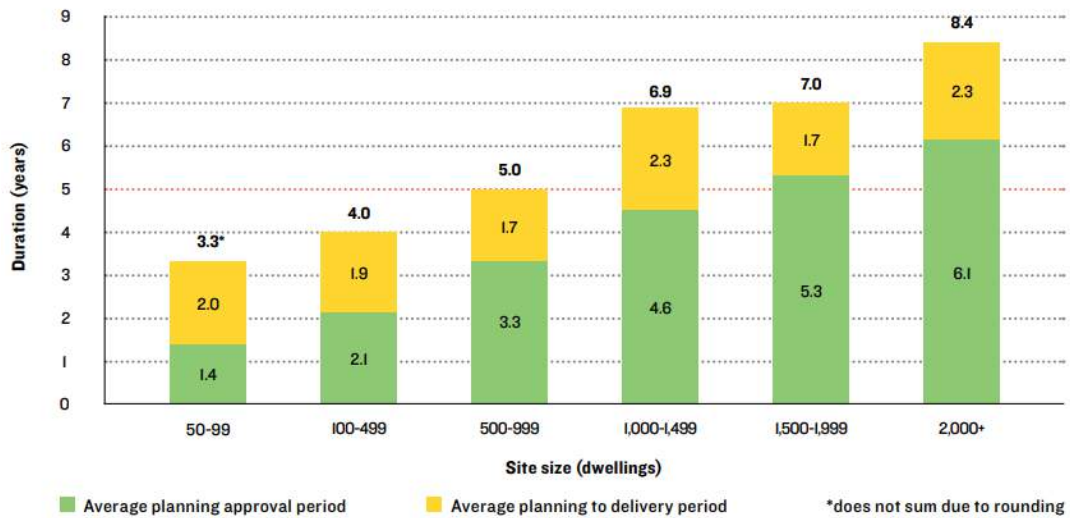


Figure 6. Extract of Lichfield’s ‘Start to Finish’ Paper: Second Edition (February 2020) showing average timeframes from validation of first application to completion of the first dwelling

4.9 Based on these factors, we have then assessed whether it is realistic for the strategic-scale allocations to come forward based on the trajectories set out by the Council.

### Cam North-West

4.10 Cam North-West is an allocation for 900 dwellings. It is anticipated that 200 dwellings would be delivered in years 2020 – 2025 with a further 700 delivered in years 2025 – 2030. This is an average delivery of 40 units per year in years 1-5 of the Plan Period and 140 per annum in years 6 – 10.

4.11 A Scoping Request was submitted for an EIA development of up to 1,100 dwellings (Application Ref: 2020/0314/EIAS) on behalf of Persimmon and Robert Hitchens last year and it is anticipated that a hybrid application will be submitted imminently, including detailed planning permission for the first phases of the residential element of the scheme.

4.12 As such, given that an application is due imminently which will include detailed planning permission for a significant proportion of the site, we consider that the trajectory is reasonable.

### **Cam North-East Extension**

- 4.13 The Cam North-East Extension is allocated for 180 units. It is controlled by Persimmon and Robert Hitchins and no application has been submitted to date. However, the timeframes set out appear to be reasonable in light of the site's constraints and scale of the development proposed.

### **South of Hardwicke**

- 4.14 Land at Hardwicke is allocated for 1,350 dwellings. It is currently anticipated that 600 dwellings will be delivered in years 2025 – 2030, with a further 600 dwellings in the following five years, after which delivery tails off.
- 4.15 Redrow Homes control the site (part freehold, with the balance of land under an option agreement) and the position statement prepared by RPS clearly sets out how the development will begin to delivery homes in years 5 – 10 of the plan period. A planning application will be submitted in Q4 of 2021 which will include detailed elements of the scheme and a dual outlet approach is proposed, which will ensure 120 homes per annum can be delivered. As such, we are comfortable in light of the evidence base submitted that the site is deliverable and will delivered quicker than the Lichfield evidence suggests because there is an evidenced timeframe for the submission of a detailed planning application and Redrow have confirmed that two outlets will be on site, each delivering 60 dwellings per annum.

### **Hunts Grove Extension**

- 4.16 The allocation which constitutes an extension to Hunts Grove will deliver a net increase of 750 dwellings, in addition to the 1,750 that are already allocated. Based on the 'Start to Finish Paper', it would take circa 5 years to obtain approval for the additional land and to see the first homes being delivered. Therefore, it seems unlikely that these homes would be delivered between in years 2020 – 2025 based on this analysis alone and the fact there has been no application submitted to date.
- 4.17 Further to this, it is apparent that a significant proportion of the main Hunts Grove site will need to be built out prior to the additional land coming forward and an access provided to this land given its location on the periphery of the allocation.
- 4.18 According to the latest 5YHLS paper, 603 dwellings of the original 1,750 allocation have been completed, first recorded in April 2012 and therefore equating to an average of 67 per year.



We acknowledge that the level of delivery has increased to circa 120 homes per annum in the last two years and the number of outlets has increased to four more recently (Bellway Homes, DWH, Crest and Bovis), however, given that Crest also control the Hunts Grove extension site, it is highly likely that they will seek to build the majority of their land control out on the original allocation, before pursuing the new land.

- 4.19 It is therefore highly unlikely that homes will be delivered within five years on this extension site in light of the remaining homes to be completed on the original allocation and the time taken to obtain planning permission for a further 750 dwellings. As such, the trajectory should be shifted back to at least years 2025 – 2030, if not 2030 onwards given that it will take a further 9.6 years to build out the current Hunts Grove Allocation based on the recently elevated delivery rate of 120 dpa ( $1,750-603/120 = 9.55$ ).

### **Sharpness Docks**

- 4.20 As we have set out within this statement we have extensive concerns with the Sharpness New Settlement, which need to be addressed if the Plan is to be found sound. In our view this should mean the removal of this allocation and it instead should be replaced with other more suitable and sustainable allocations such as the land at Kingswood.
- 4.21 Notwithstanding this conclusion, we have also reviewed the likelihood of the trajectory being delivered as planned in respect to the current allocation at Sharpness Docks. Based on Lichfield's Start to Finish, it is anticipated to take circa 4 years from the validation of the application through to delivering the first home on site for a scheme of this size (300 dwellings). An outline application was submitted in April 2017 and is still pending determination (Application Ref: S.17/0798/OUT), with technical issues and comments still to address.
- 4.22 This indicates that the Lichfield's Start to Finish Paper is not wholly accurate (and doesn't proport to be because it is an average) and has demonstrated already the significant difficulty with obtaining permission on a brownfield site such as this one. Given the Conservation Area, Ecological and Listed Building constraints, and no doubt viability issues associated with the site, it is potentially unrealistic to expect RMs to be submitted and approved, with buildings demolished, contamination investigation undertaken, and 110 homes delivered within the next five years.
- 4.23 The Viability Assessment May 2021 paper states *'in taking this approach it remains necessary to be cautious about relying on the brownfield sites to deliver in the early years of the Plan,*

*and the Council should only count on such sites (for example in the five-year housing land supply calculation) where it is confident the site will be forthcoming, for example there is a recent planning consent.'*

- 4.24 The work in this paper also demonstrates that this site is not viable and therefore it is anticipated that a lower level of affordable housing delivery will occur here, if assessments haven't already been submitted.
- 4.25 Accordingly, we consider that a conservative approach should be taken to this site and delivery in the trajectory delayed to years 2025-30.

### **Sharpness New Settlement**

- 4.26 We have already highlighted our concerns with the overall allocation of land at Sharpness and the fact that in our view, this is an unsustainable location for growth that has significant and overwhelming viability challenges. Aside from this, we have also reviewed the trajectory put forward and note the significant level of homes that are anticipated to come forward within the next 10 years.
- 4.27 Based on a high-level review of the Lichfields paper, the first homes would not be delivered for at least 8.4 years. However, given the scale of the scheme proposed and the mitigatory measures and infrastructure that is going to be required to make the development acceptable in planning terms (if that is indeed possible), we cannot envisage an application being submitted prior to the Inspector ratifying any allocation for the site, and the plan being adopted. As such, based on a Local Development Scheme which anticipates adoption in Autumn 2022, even if an application were submitted this year, it would be anticipated that development would not occur until at least 2030. As such, it is unrealistic to assume that 500 homes could be delivered within the next five-year period.
- 4.28 Further to this, the level of delivery anticipated in the later stages of the plan period are beyond anything previously achieved across the UK. To compare, Didcot Parkway, one of the best-selling sites in the country, have only achieved circa 350 units per year across 6 outlets (1,750 over a five-year period). Sharpness has no backing from a developer and the site is yet to be market tested, therefore the level of uncertainty is extremely high.
- 4.29 It therefore highly unrealistic that the site will deliver the 2,400 homes envisaged in the plan period and definitely not within the first 10 years of the plan.

### **Stonehouse North-West**

- 4.30 The allocation at Stonehouse North-West is for a further 700 dwellings and is a further extension of the Great Oldbury Drive site which was allocated in the 2015 Local Plan. The site is controlled by Robert Hitchins and Redrow Homes and a detailed application will be submitted in August 2021 for the development. Further to this, the spine road for the original Stonehouse allocation has already been delivered, meaning there is no requirement to wait for access to be provided before homes can be completed in this location.
- 4.31 As such, the assumptions underpinning this allocation and deliverability of the site is reasonable, in light of the evidence presented.

### **Wisloe**

- 4.32 As set out within our previous representations and within other sections of this statement, we have significant concerns in relation to the allocation of this land, not least because it is essentially a further extension of Cam and there is very little evidence to underpin it as a credible and deliverable allocation.
- 4.33 Notwithstanding this, we have again assessed the proposals and whether the trajectory is realistic over the plan period. Based on the Lichfield's paper it would take circa 7 years from the submission of an application through to the delivery of the first home on site. Given this is a GCC controlled parcel of land, and the level of objection from members to this scheme, we do not anticipate that an application would be submitted until the allocation is ratified by the Inspector and / or the plan is adopted for political reasons at least. Currently this is planned for Autumn 2022 (which in itself is ambitious given the delays associated with the preparation of Local Plans and the need for further stages of consultation in respect to modifications to the plan), even if an application were to be submitted immediately it would be surprising if any homes could be delivered prior to 2030. It is therefore highly unrealistic to expect 50 homes to be delivered within the next five years, followed by a hugely increased number of 565 homes over the five-year period.
- 4.34 As such, aside from the overall viability and deliverability of this scheme, it is highly unlikely that during the first or second five-year period would homes be delivered.

## **Conclusion on the Deliverability of Sites**

- 4.35 Having reviewed the strategic allocations set out in the Local Plan, we consider that the timeframes suggested within the trajectory is unrealistic and sites come 'online' much later than anticipated due to the infrastructure requirements and scale of the sites involved.
- 4.36 We therefore question whether, in light of our analysis which identifies that sites will not come forward as planned, SDC will be able to demonstrate a rolling 5YHLS within the first five or even ten years of the plan period due to the overreliance on strategic sites that require significant levels of infrastructure to come forward. This is because the allocations will not 'plug the gap' as anticipated by November 2023.
- 4.37 We also consider that in some cases, we have been conservative in our approach, with some Inspectors unlikely to agree that an outline application can be included within a 5YHLS trajectory even with pending RMs included.
- 4.38 As set out in our representations to the AHO Consultation, this is why a mix and balance of sites is required to ensure choice and competition in the market and to ensure homes will be delivered in a timely manner in the early parts of the plan period to boost housing supply. As the Lichfield's analysis sets out, it is likely that the majority of sites of less than 500 units have the potential to deliver housing in the five-year period (with a proportion offering detailed planning permission from the outset) and it is essential additional sites of this scale be selected to provide a more balanced portfolio and boost five-year supply in the early stages of the plan period, while also reducing the current overreliance on strategic scale sites.

## 5.0 **LAND NORTH OF CHARFIELD ROAD, KINGSWOOD**

5.1 In light of the above evidence, we consider that certain strategic-scale allocations such as Wisloe and Sharpness ought to be removed from the Plan and replaced with other, more suitable allocations, such as Whitminster and land north of Charfield Road, in Kingswood.

5.2 We have previously set out in Section 5 and Section 7 of our representations to the AHO consultation (please see Appendix J) why we consider that the site is a suitable location for growth and our concerns in respect to the lack of development proposed for the Wotton cluster.

5.3 In summary, our concerns were as follows and we would respectfully request that SDC / the Inspector to review our representations in full:

- Wotton-under-Edge should clearly be identified as a Tier 1 settlement given its performance in accessibility terms and employment levels;
- Given the AONB constraints of Wotton-under-Edge it would seem reasonable to place development in locations nearby to support its function as a key settlement within the District, such as Kingswood which lies within walking distance of Wotton;
- Kingswood outperforms a number of other settlements including Stonehouse, Nailsworth and Minchinhampton within the Settlement Function Study 2018, and these settlements are provided with higher levels of housing growth;
- It is therefore unclear why residential development is being constrained here when there is a significant employment allocation proposed and complementary housing development could reduce in-commuting and support affordable housing requirements for this area.

5.4 We have expanded on some of the points raised previously below.

### **The Sustainability Appraisal**

5.5 National Planning Practice Guidance (NPPG) requires authorities to apply an *'iterative process informing the development of a Local Plan'* (Para: 001, Ref ID: 11-001-20140306) in relation to the plan-making process and in particular the Sustainability Appraisal (SA).

5.6 NPPG also requires authorities, during the plan-making stage, to assess 'reasonable alternatives'. It states that the alternatives in the SA should be appraised to the same level as the preferred options put forward; that the SA must outline the reasons why the various

alternatives were selected, and the reasons the rejected options were not taken forward; and that the SA should be an iterative process, with the proposals being revised to take account of new findings during the preparation of the plan. The LPA should be satisfied that the SA accompanying the plan adequately gives reasons for rejecting any reasonable alternatives, and that those reasons are still valid by the end of the process. This is with the aim of achieving sustainable development objectives.

- 5.7 Land at Charfield Road, Kingswood, has been assessed to a certain degree throughout the plan's preparation – this is evidenced in Appendix 5 of the SA. The land has been assessed both as a smaller parcel (KIN013) and larger parcel (KIN008), albeit for the larger assessment it tested 150 homes rather than the 300 and land for a primary school put forward in previous Redrow representations.
- 5.8 However, in our view, the SA has not assessed this alternative to the same level as the preferred options, particular as the latest assessment does not appear to take into account the representations made during the AHO consultation earlier this year, which included the provision of an initial landscape assessment and strategy which sets out how the site can be sensitively designed and delivered to accommodate this level of growth without resulting in an adverse landscape impact. There is no reference to the masterplan for the site nor the fact that a mixed-use development is being proposed, which includes 300 homes and land for a new two-form entry primary school which will address constraints that currently affect the educational capacity of the area.
- 5.9 As such, we question whether SDC have looked thoroughly at this new evidence and assessed it in full, in accordance with PPG. In our view, had our significant evidence been taken into account, which identified that the allocation of land here would support the existing imbalance of jobs and workers (with many more jobs than local residents), the provision of affordable housing, land towards a new Primary School, and contributions and establishment of the Greenway route to reduce car travel, SDC would have considered allocating this land for development, given that it contributes to all of the various objectives of the Local Plan, but in particular SO1: Accessible Communities; SO2: Local economy and jobs; SO4: Transport and Travel; and SO5: Climate Change and Environmental Limits.
- 5.10 Importantly, we consider that the lack of allocations within the Wotton cluster fails to meet its key objective set out within the plan, which is to *'improve access to jobs, services and facilities in the south of the District, to boost local sustainability and community vitality'*.

5.11 Turning to the specific assessment of the site within the SA, we have reproduced the results of KIN008 below for ease of reference (we have disregarded KIN013 given that this is not currently being proposed):

SA Objectives	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
KIN008	+	+/-	0	0	0	-	0?	--?	?	-	0	--	--?	0	0	+	++?

Figure 7. Extract of the SA assessment of land north of Charfield Road, Kingswood

5.12 We have reviewed the SA of the site and can comment as follows:

- The site is located within 400m of two footpaths to the north and south of the site, therefore should have scored ++/- instead of +/-;
- We note under SA6 the site scored a -- due to the land not being within or directly adjoining a Tier 1-4 settlement. This is simply not the case, it lies directly adjacent to the boundary and built-up settlement of Kingswood. As such, it should have scored a +;
- The site has not been assessed as a whole within the Landscape Sensitivity Assessment nor the Strategic Development Options paper, therefore there is no evidence to suggest it has a high landscape sensitivity. Our own assessment indicates that this is low-moderate, therefore the site should score -?, rather than --? under SA8;
- Under SA9 it states that the 'site was not included in the SALA Heritage Assessment', therefore scoring ?. Our accompanying report suggests that whilst there is a nearby listed building (Langford Mill), this is not highly sensitive to change. As such, in the absence of any other evidence, it is suggested that the site can score 0 instead of ?, given that it would have a negligible impact on heritage assets.
- We are unable to find a copy of the SALA Transport Accessibility Assessment which is referred to throughout the SA which provides a score for each site. In the minimum, this needs to be uploaded to the Council's website so that it may be reviewed and it ascertained whether the site has been assessed appropriately, however as set out we consider that it is a sustainable location for growth given its proximity to Wotton-under-Edge and the number of facilities within the settlement itself;
- As set out in the accompanying drainage reports, a small proportion of the site on the northern boundary lies within Flood Zone 3a/3b which runs along the river. The majority of the site is outside of the Flood Zone and therefore it should have scored - rather than --.

- With respect to SA13, the site lies on Grade 3b and 4 agricultural land, however it would be a mixed-use scheme (housing and a school, which provides employment), which is less than 600 dwellings in size and on greenfield land. As such, this should have warranted a + score rather than a --? score.

5.13 As such, had the site been assessed thoroughly, and new evidence taken into account that has been submitted during the consultation stages, the site would have scored much higher within the SA and clearly showed that it was a reasonable alternative to pursue:

SA Objectives	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
KIN008	+	++/-	0	0	0	+	0?	-?	?	-	0	-	+	0	0	+	++?

Figure 8. Our assessment of land north of Charfield Road based on the objective criteria set out in the SA methodology

5.14 We may accept the Council’s argument that the site had been dismissed on landscape grounds had an assessment of the entirety of the land actually been undertaken as part of the supporting evidence base; however as our evidence sets out, the site can be sensitively delivered with a robust landscape strategy which has informed the masterplan.

5.15 We appreciate that the argument will be made that other factors have been taken into account when selecting sites; however, with respect to land north of Charfield Road, there are clear reasons why one may select this site as option for growth and outweigh the alleged landscape impact. We discuss this below.

**Affordable Housing**

5.16 We have examined the provision of affordable housing across Stroud and in particular the Wotton cluster; having studied this it is our view that the lack of delivery in Wotton-under-Edge in previous years and in future will have an impact on the ability to meet general market and affordable housing need in this location, which will in turn affect affordability.

5.17 We have reviewed the historic applications in Wotton-under-Edge since 2011 and the majority of these sites are 10 units and under, meaning that no affordable housing has been provided. We found three examples of major development sites in Wotton, however two of these were brownfield redevelopment opportunities and so viability assessments were submitted with them to reduce the level of affordable housing provision to zero, with the third providing policy compliant levels. An application for an affordable scheme of 8 units was approved in 2019 (Application Ref: S.19/1054/FUL).



- 5.18 Based on the available evidence, we estimate that only 16 affordable homes have been completed in Wotton-under-Edge since 2011. As there are no allocations in Wotton-under-Edge due to its constraints within the AONB, it seems logical to place development in the adjacent settlement to meet the need for affordable homes, such as Kingswood. This is particularly acute given that the most recent data indicates that there are 237 applicants on the register in need in Wotton-under-Edge, with a further 72 applicants on the Homeseeker Plus register, as of December 2020.
- 5.19 Whilst commitments and the proposed allocation at Wickwar Road will go some way to addressing this, there will still be a significant proportion of local people without a home. Land north of Charfield Road can deliver 90 affordable homes based on the current masterplan which can deliver up to 300 dwellings.
- 5.20 Accordingly, we consider that further growth is required within the Wotton cluster to address the critical issue of a lack of affordable housing delivery over the last 9 years in Wotton-under-Edge and future requirements for affordable homes. Given the constraints that apply to Wotton itself, homes should be allocated within Kingswood which lies in close proximity to address the need.

### **Economically Active People to Number of Jobs**

- 5.21 Within our previous representations we highlighted the fact that Kingswood has a high number of jobs compared to people, equating to a ratio of 1.63:1. This ranks amongst one of the highest within the list of settlements and evidence has demonstrated there is a net importer of workers to this area. We have reiterated this table below for ease of reference:

*Table 3. Comparison of Ratio of Jobs : Workers*

<b>Settlement</b>	<b>Ratio of Jobs : Workers</b>
Stonehouse	1.75 : 1
<b>Kingswood</b>	<b>1.63 : 1</b>
Whitminster	1.41 : 1
Brimscombe	1.06 : 1
Eastington (Alkerton)	1.06 : 1
Frampton on Severn	1.04 : 1
Upton St Leonards	0.98 : 1
Minchinhampton	0.88 : 1
Stroud	0.84 : 1

Painswick	0.82 : 1
Nailsworth	0.78 : 1
Berkeley	0.72 : 1
Dursley	0.69 : 1
Newton & Sharpness	0.65 : 1
Chalford	0.56 : 1
Uley	0.56 : 1
Wotton-under-Edge	0.53 : 1
Hardwicke	0.51 : 1
Cam	0.47 : 1
Leonard Stanley	0.42 : 1
Kings Stanley	0.41 : 1
Whiteshill & Ruscombe	0.38 : 1
Manor Village (Bussage)	0.36 : 1

- 5.22 We therefore suggested that in order to meet the Local Plan's goal of providing '*improve[d] access to jobs, services and facilities in the south of the District, to boost local sustainability and community vitality*', land should be allocated in this area.
- 5.23 The allocation at Renishaw is a significant step in further engendering employment growth in the south of the district and we are pleased to see this going forward as part of the Plan for a mix of office (B1), B2 and B8 uses of up to 10 hectares. Based on the most recent representations submitted in connection with this employment allocation by Ridge and Partners in May 2021, it is anticipated that an application for a building of 3,000m<sup>2</sup> GIA will be submitted imminently for '*the purpose of research and development of electric vehicle technology with provision made for small-scale prototype production and sales*'. This is an extremely positive step in supporting the tech industry and shows that there is continuing demand for employment in this area.
- 5.24 Based on the Government's Employment Densities Guide (last revised in 2015), they establish that for the R&D sector (which sits between B1, B2, and B8 uses – now use class E), creates circa 1 full-time employee (FTE) per 47m<sup>2</sup>. Dependent on the level of the final number of buildings on the site, but assuming that the allocation will yield circa 5-7.5ha of actual employment land (assuming that 25-50% will need to be given over to infrastructure such as parking, drainage and landscaping), this would create over 1,000 – 1,600 jobs over the plan period.

- 5.25 In our view, the significant increase in the number of jobs in this location needs to be supported by commensurate housing growth to give people the opportunity to walk or cycle to work, supported by bus services and infrastructure which has already been planned and costed for by local providers – such as Stagecoach, which we highlighted in our previous representations (paragraph 5.10 of Appendix J of this statement).
- 5.26 At the current time, the provision of just 50 dwellings within the Wotton cluster would only equate to an additional 70 workers (based on the NOMIS labour market statistics which states there are 34.1 million economically active people, and 24.4 million dwellings based on the dwelling stock estimates 2019 – resulting in approximately 1.4 economically active people per house).
- 5.27 As a result, the lack complementary housing growth to this employment allocation will exacerbate issues of in-commuting as there will be a lack of supply of new homes in this location, which in our view goes against the importance of reducing car travel which is recognised in the Local Plan. In Kingswood, there is clearly not sufficient housing to support the existing number of jobs in the area, let alone the future plan aspirations. Housing growth at Kingswood would help reduce this issue and support the objectives of the Local Plan.
- 5.28 In addition to this, since the COVID-19 pandemic has begun, there has been a shift in workplace patterns and individual's attitudes towards travel and transport. Whilst the full repercussions are yet to be established, recent surveys and studies have found that people no longer want to commute to work over a long distance, and would prefer travelling shorter distances more sustainably, such as by walking or cycling to work. Further to this, the importance of open space and mental health has come to the forefront of place-making and it is clear that any employment development of Renishaw should be supported by extensive parkland and open space.
- 5.29 Land north of Charfield Road can accommodate this, as already shown on the layout plan provided which includes extensive levels of public open space as well as a dedicated walking / cycling path for commuters. Its proximity to Renishaw means that during lunch hours it would be perfectly reasonable for employees to access this space for their mental health and wellbeing, or to go home quickly to spend time with family. As part of their development proposals at Kingswood, Redrow Homes would be willing to fund a new pedestrian crossing between the employment land and the extensive parkland proposed to ensure the free movement of pedestrians and cyclists to and from these areas.

- 5.30 This will improve connectivity and support access to open space for both existing and future employees as well as residents in the local area.

### **Technical Assessments**

- 5.31 A summary of the technical work undertaken to date is presented below, technical work can be found in the accompanying appendices. Since the previous consultation period further technical work has been undertaken in the form of an Agricultural Land Quality Assessment, Heritage Statement and updates to the masterplan to take into account these findings.

#### *Accessibility*

- 5.32 We consider that the development proposed at Charfield Road could form a sustainable extension to the village and provide the critical school infrastructure required to address the existing capacity issue cited by the Primary School itself and the Parish Council.
- 5.33 The site is well located and lies between the urban edge of Kingswood and the major employer Renishaw, which is allocated for further development of 10 hectares of land for commercial uses.
- 5.34 Kingswood itself contains a number of everyday facilities, including a convenience store, village hall, playing fields, primary school, churches, public house, MOT garage and car home. Katharine Lady Berkeley's Secondary School lies to the north-east, approximately 0.6km east of the site.
- 5.35 Beyond this to the north lies the settlement of Wotton-under-Edge, where there are a multitude of everyday facilities and services capable of meeting everyday needs. The site sits circa 2.3km walking distance to the centre of Wotton-under-Edge from the centre of the site, using main roads which have pavements. This is only marginally over the maximum walking distance that the CIHT guidance refers to (2km), and many facilities within Wotton lie within the 2km distance (swimming pool, secondary school and doctor's surgery).
- 5.36 As set out above, there are existing bus stops in proximity to the site which carry the 60, 63, 84, 85, 626, 860 and S8 bus routes, which provide regular services to Thornbury, Wotton-under-Edge, Charfield, Yate and Wickwar. The Stagecoach representations submitted earlier this year highlight the potential to expand and improve these services which already see a significant amount of traffic flow in this location with ease, with the strategy for improving this already agreed and costed.

5.37 Proportionate development in this location could therefore support, sustain and enhance existing facilities and services through the provision of the critical mass required to make a viable business case for enhancing and improving infrastructure.

#### *Landscape*

5.38 As the proposed site lies adjacent to the established boundaries of Kingswood and has the potential to influence long range viewpoints from the AONB, the landscape impact of the development and the setting of the site has been an important consideration when considering the extent and form of development that is possible here.

5.39 Accordingly, landscape advice has informed the design process so far and this has been summarised in the Landscape Strategy document prepared by Pegasus which is provided in Appendix D.

5.40 The initial work set out a range of key recommendations that the development must adhere to in order to minimise landscape impacts to acceptable levels, these included:

- The development should be set within a landscape framework that works with the topography of the site and site context and provides a lower density edge to it, to provide an appropriate transition to the rural areas and AONB beyond;
- Provide POS that breaks the mass of the development up and provides mitigating screening;
- Carefully consider the nearby viewpoints, such as the PROW to the north and provide parkland areas that screen and filter views of the development;
- Integrate SUDs into a POS scheme for the site that respects the current water-based infrastructure that serves the site;
- Provide an appropriate landscape buffer to existing development in Kingswood, in particular in respect to the adjacent listed Langford Mill House building;
- Utilise and integrate existing landscape features such as trees and hedges into the new proposed landscape strategy for the site; and
- Propose the most extensive POS areas to the north of the site to provide an appropriate buffer between the site / Kingswood and the Renishaw employment site.

5.41 These recommendations have guided the emerging master plan proposals and the extent of the development footprint and its structure. Essentially the strategy now seeks to create

a generous parkland setting around the housing development which 'bleeds' into the housing site via existing hedgerow and ditch corridors. Extensive planting is proposed within the parkland which will be multi-functional in making this area attractive and useable for all existing and new residents of Kingswood, greatly enhance the biodiversity value of the site and visually break up and screen the development from key views nearby, and from the AONB.

- 5.42 The resulting landscape strategy plan is set out in figure 14 below and it is considered that if this is implemented the landscape and visual effects of the development will be acceptable and an attractive and useable new publicly accessible park provided for all residents, and nearby employees, to use.

#### *Highways*

- 5.43 Accessibility has already been discussed above, however in terms of highways safety Paul Basham Associates (PBA) have assessed the potential access into the site including visibility splays and are comfortable that up to 350 dwellings can be delivered in this location (up to 350 was considered to allow for flexibility in case the proposals go over 300) (Appendix C).
- 5.44 It is acknowledged that there are existing capacity issues at J14 of the M5; solutions are already been discussed to create a roundabout which will ensure there is reserve capacity to accommodate committed and future development. It is our view that further development in this location will capture obligations towards improving the junction which can be secured via s106 or CIL.
- 5.45 As set out within our previous representations, we consider that there are other more suitable options for development which could leverage off existing transport connections with a more appropriate level of funding, compared to proposals such as Sharpness. This notion is supported by Stagecoach who agree that there is no business case for Sharpness but can see a credible plan to improve existing services between Wotton-under-Edge, Kingswood, Charfield and Thornbury.
- 5.46 Paul Basham Associates have undertaken a review of the existing transport offering in Kingswood and Charfield and considered committed development (both residential and employment), as well as pending applications and allocations in these areas. Their report is available in Appendix C and also provides a map showing the level of potential development coming forward between these settlements, and how this increased level of patronage, including the allocation of land at Charfield Road, could reasonably sustain an existing

transport service and allow an operator to make improvements to enhance the level of provision. Notably, Kingswood and Wotton also lie in close proximity to the proposed Charfield Railway station, which an improved bus link could connect in with. An extract of the map is shown below for ease of reference:

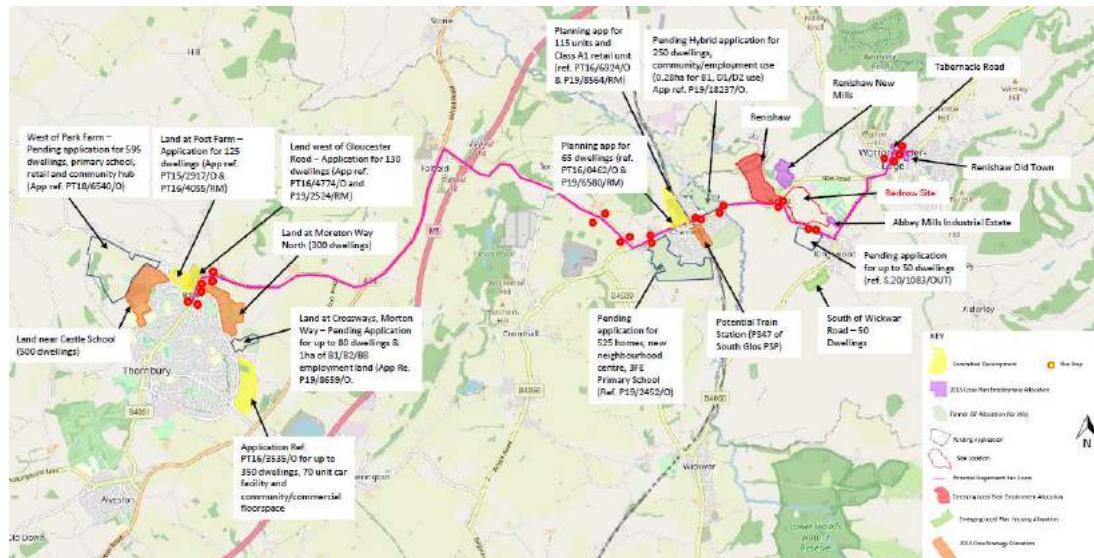


Figure 9. Extract of map showing proposed allocations, committed development and pending applications within Thornbury, Charfield, Kingswood and Wotton-under-Edge (both residential and employment)

- 5.47 This is a far more credible option for sustainable transport goals, where there are existing services already in place, compared to proposing new development in Sharpness where there are limited (if any) services and this would require significant levels of funding to become viable.

### Flood Risk & Drainage

- 5.48 The site lies within Flood Zone 1 and is at low risk from flooding, as well as at a low risk from surface water flooding. As such soakaway testing will be undertaken to ascertain whether infiltration is possible across the site as a method of drainage, if not attenuation will be used and discharge to an existing outfall in close proximity to the site.

### Ecology

- 5.49 A Phase 1 Ecological Assessment has been undertaken by Green Ecology for the land to the east in December 2019 and across the whole of the site in October 2020. This report accompanies these representations and can be found in Appendix G. The assessment however identified that there are limited ecological constraints to this land and additional surveys were required for birds, bats and reptiles (including Great Crested Newts) only. It has also been

noted that a buffer to the stream to the north should also be incorporated to protect these habitats.

- 5.50 A minimum 10% net gain will be achieved on the site in line with Biodiversity Impact Assessment regulations and the conversion of sterile agricultural fields to more diverse parkland should be viewed as a significant benefit to biodiversity and ecology.

#### *Heritage*

- 5.51 We are aware of the Grade II Listed Building to the east of the application site known as the Landford Mill House.
- 5.52 An initial Listed Buildings Settings Assessment has been undertaken by Cotswold Archaeology and can be found in Appendix E. This has identified that whilst the Langford Mill is of heritage interest it is not particularly sensitive to change and therefore the site can be developed for housing and a school. They have made a number of recommendations within their report to mitigate any potential impact on this asset which have now been reflected within the updated masterplan. Heritage therefore does not present a significant constraint to development.

#### *Odour*

- 5.53 The Kingswood Wastewater Treatment Works (WTW) lies to the north of the Redrow site. Therefore, the potential for odour to cause a negative impact on, and potentially preclude development, has been assessed by technical consultants Isopleth Ltd.
- 5.54 Their report is included as Appendix H to this document and the assessment undertaken used information provided by Wessex Water to consider the odour emissions from the WTW and produced a contour plan that models the potential impacts arising from the WTW.
- 5.55 The results of the assessment have identified that the average odour impact associated with the WTW is within acceptable parameters at all locations within the potential development site except for those closest to the WTW on the site's northern edge. These fringe areas of the site are to be proposed as parkland so no adverse effects on residents will occur.
- 5.56 In light of the assessment undertaken the presence of the WTW to the north of the site presents no constraint to the proposed development and would not result in any adverse impacts in relation to odour.



## *School Capacity*

- 5.57 As set out in previous sections of this statement, we are aware of an existing school capacity issue at Kingswood Primary School, noted by both the Primary School itself and the Parish Council. Additional housing applications in this location have been objected to by Gloucestershire County Council (GCC) due to the lack of provision in this location. A separate note has been prepared by Mike Melton, who is an education property specialist, in relation to this issue. This can be found as Appendix I at the end of this report.
- 5.58 The Sustainability Appraisal (SA) Report which accompanies the Draft Local Plan also highlights this issue and the impact this could have on sustainability objectives in this area. Paragraph 5.33 of the Report states:
- "In the Wotton-under-Edge area, new housing developments local to Kingswood Primary School should be monitored as there are short term capacity issues due to this school's site restrictions. There is likely to be a requirement to continue to hold discussions with developers to inform how they will make provision available locally. There may be primary school capacity within the wider planning area, at Wotton-under-Edge, however, this would require parents and children to travel out of Kingswood village for primary education".*
- 5.59 The evidence base has identified that there are also capacity issues at the schools in Wotton-under-Edge and this has been significantly downplayed in the SA Report that accompanies the plan. It is understood that whilst a temporary solution has been considered, there is no longer-term plan for the capacity issues at Kingswood Primary School. Land north of Charfield Road can provide this.
- 5.60 This is therefore a critical issue which needs to be addressed now to avoid worsening capacity issues at KPS and resulting in primary school-aged children having to travel via bus or car to get to school each day – the NPPF (July 2021) urges authorities to ensure that there is a sufficient choice of school places available to meet the needs of existing and new communities (paragraph 95), and to *'work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted'*. This issue does not appear to have been resolved in Kingswood and land north of Charfield Road can provide an immediate solution to this problem if allocated for development.

### *Agricultural Land Quality*

- 5.61 The assessment recently undertaken by Kernon Consultants has identified that the land is Grade 3b and 4 quality agricultural land and is therefore not considered to be Best and Most Versatile, and therefore it is not protected under national policy.

### *Updates to the Masterplan*

- 5.62 The masterplan has been updated to respond to the additional technical work undertaken with respect to landscape and heritage, and can be found in Appendix B to this statement. Additional technical work will continue to be undertaken to inform the masterplan in due course.

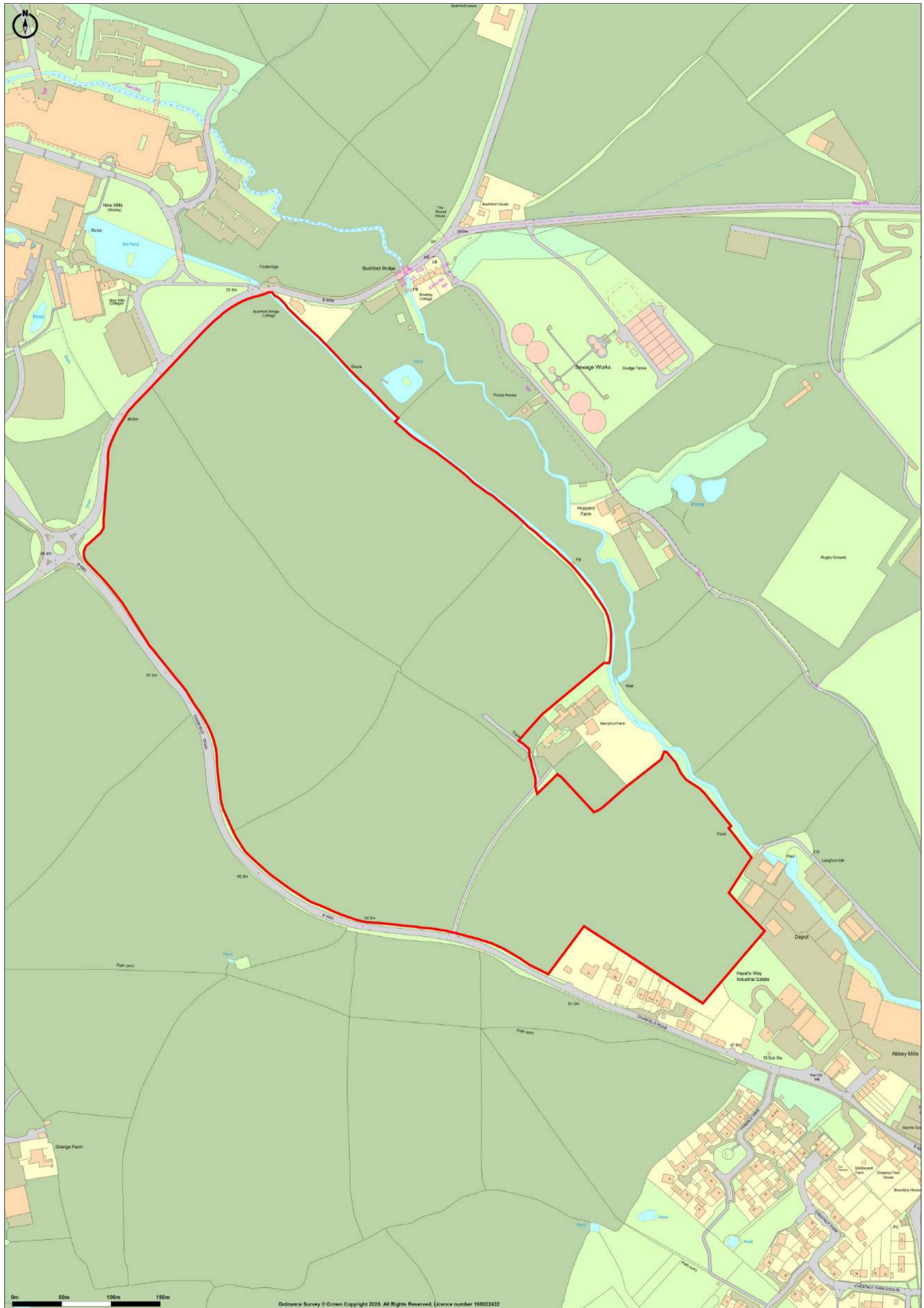
### **Conclusion**

- 5.63 The technical work undertaken to date which is primarily landscape-led has informed and shaped the masterplan presented which is continually being updated to respond to the additional survey work.
- 5.64 The proposals will incorporate a mix of dwellings and policy compliant affordable housing to meet both Kingswood and Wotton-under-Edge's need, which is significant given the issues we have discussed in this statement and our previous representations.

## 6.0 CONCLUSIONS

- 6.1 In summary, we continue to have significant concerns that the current Local Plan strategy relies too heavily on strategic sites. Such sites have no realistic prospect of coming forward within 5 – 10 years which will have a knock-on effect on five-year housing land supply. The Plan therefore fails to be effective in this respect as it does not front-load supply to a degree that provides a robust five-year supply in the first five years of the plan, and thereby does not allow SDC to meet its obligations to maintain such a supply. Such an approach is inconsistent with national policy as a result because it will be ineffective at delivering housing.
- 6.2 We also do not consider the plan to be sound because of a lack of credible evidence to underpin the allocation of land both at Sharpness and Wisloe and we continue to be concerned over the viability and deliverability of these allocations as no robust evidence has been presented to demonstrate how infrastructure has been costed and how development will pay for it, which is likely to be required at an early stage in the development, therefore exacerbating the problem of funding. It is therefore not justified, and consequently unsound.
- 6.3 Furthermore, there is little to no provision for the Wotton cluster in terms of complementary housing delivery to support the employment land identified, and as such, we consider that the aforementioned strategic allocations should be removed and replaced with more suitable and sustainable locations that already have new infrastructure costed and planned for, where concentrations of jobs already exist to avoid extensive commuting and facilities are available that are easily accessible via non-car means. This would include at locations such as land north of Charfield Road, Kingswood.
- 6.4 Redrow's proposals for Charfield Road would deliver 300 homes, land for a school and extensive parkland and open space, providing significant green infrastructure for not only existing and future residents but also supporting the expansion of Renishaw and employees' mental health and wellbeing.
- 6.5 Technical work to date has not identified any significant constraints to the site's development, with the proposals underpinned by a landscape-led strategy to ensure that there will be no adverse effects of the development.
- 6.6 We therefore conclude that the inappropriate strategic allocations of Sharpness and Wisloe should be removed to make the plan sound, and land should instead be allocated across other strategic sites and smaller allocations to ensure a balance of sites are achieved, to boost housing supply in the short-term to ensure that the plan is effective for its lifetime.





















**APPENDIX A**  
**SITE LOCATION PLAN**



**KEY**

- First Property
- Second Property
- Ransom Strips

**APPENDIX B**  
**EMERGING CONCEPT LAYOUT**

-  Site boundary
-  All modes access
-  Pedestrian / cycle / emergency vehicle access
-  Existing pedestrian route
-  Proposed Greenway route
-  Proposed pedestrian route
-  Residential street
-  Shared surface street
-  Private drive / pavement
-  Residential development + indicative frontage
-  School
-  Public open space
-  Structural open space (not publically accessible)
-  Retained trees
-  Existing hedgerows retained
-  Proposed trees
-  Proposed hedges
-  Ecological / odour offsets
-  Potential attenuation area (subject to drainage design)
-  Play area

**Concept Masterplan**

**Access and Movement**

1. Potential Access from Charfield Road for all modes.
2. Strategic pedestrian / cycle link connecting Kingswood to Renishaw through the development and open space. There is further future opportunity to integrate with the established Sustrans network, creating a new sustainable route locally.
3. A hierarchy of streets creates a legible residential environment. The hierarchy includes a main avenue which runs through the site and connects to secondary residential streets, shared surface areas and private drives.
4. Connected Green Infrastructure strategy which includes large usable areas of POS around the periphery of the development as well as open space around the retained hedgerows within the site.
5. Walking routes.

**Landscape**

6. SUDS provided as part of a site wide biodiversity net gain package.
7. Legible green street through the development to provide north east to south east axis;
8. Integration of existing vegetation into the landscape framework - enhance & improve whilst protecting and retaining existing trees & hedgerows
9. Creation of a pocket park at the centre of the development for formal play provision
10. Creation of a series of formal surfaced and informal paths to provide a variety of routes for informal amenity within the parkland
11. Enhance the western edge of the site into a green edge to the development through retention of hedgerow and mature trees along Charfield Road. Enhance with complementary tree planting;
12. Improve biodiversity through grassland to provide habitat and visually attractive wildflower grassland for users;
13. Enhance existing hedgerows to create green corridors to provide separation between the development parcels and to provide a verdant landscape framework
14. Potential to incorporate play areas, micro-allotments and community orchard within large open space to provide convenient access for all.

**Community**

15. Potential 2 form entry Primary School central to the site and located for easy access, particularly by foot / cycle.
16. Buildings will address POS with shared space / private drive frontage to promote quiet streets. Green spaces have frontages overlooking them to provide natural surveillance.
17. A range of family homes houses will be two-storey with potential use of roof space for an additional accommodation level (2.5 storey).
18. The site is well connected to Kingswood and its local facilities through a new strategic pedestrian / cycle link connecting onto Charfield Road



client:  
**Redrow Homes**

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project:  
**Charfield Road, Kingswood**

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drawing title:  
**Concept Masterplan**

job number:  
**RED102**

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scale:  
**1:4000 @ A3**

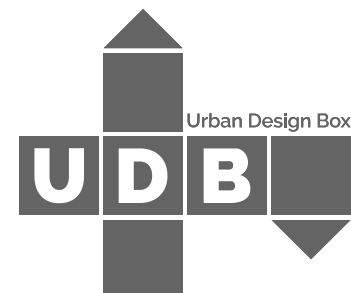
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date:  
**July 2021**

drawing number:  
**3201A**

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status:  
**Preliminary**

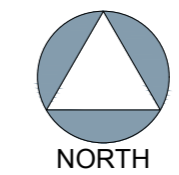
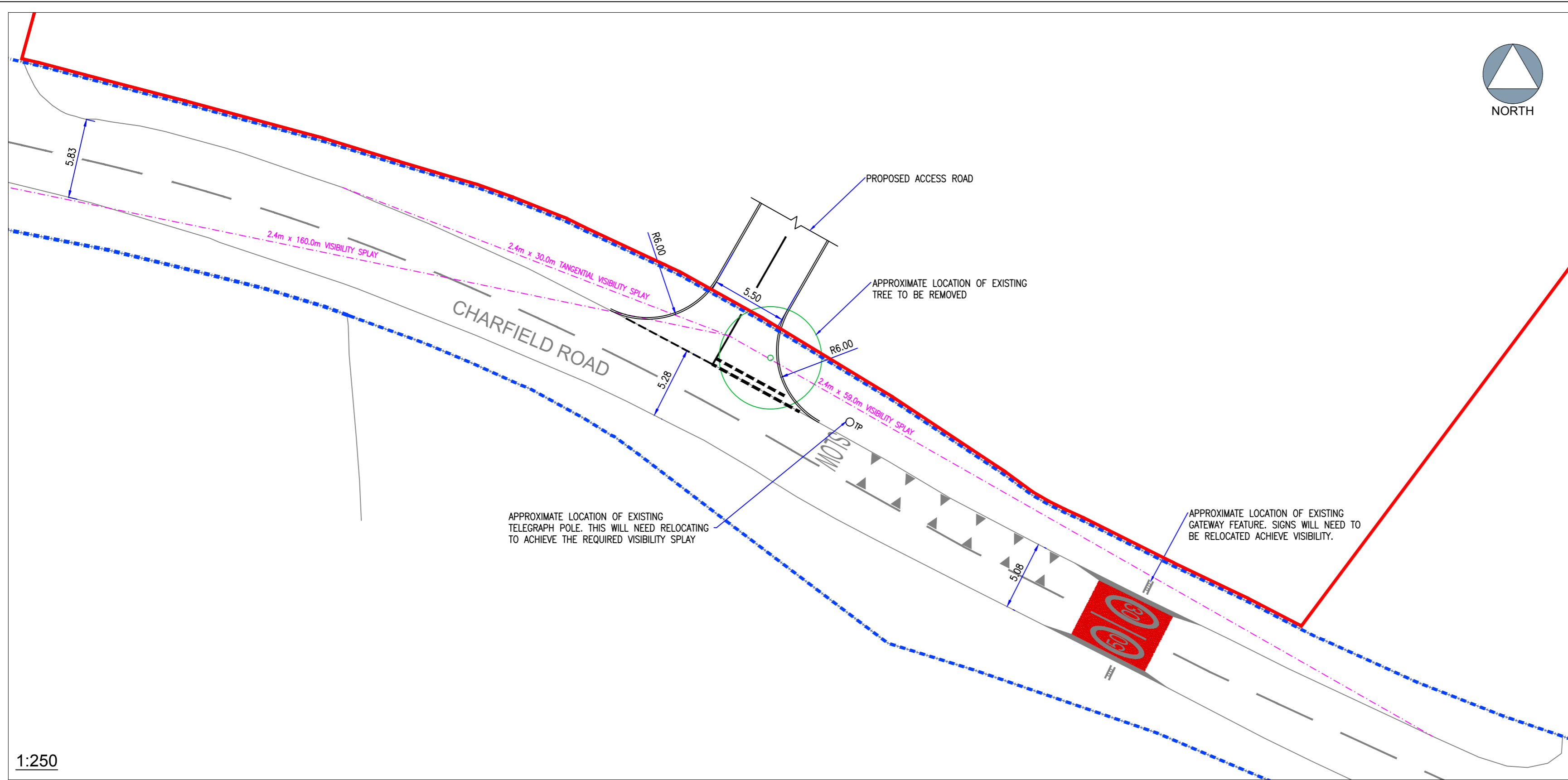


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## **APPENDIX C**

### **ACCESS PLAN & TECHNICAL NOTE RELATED TO PUBLIC TRANSPORT OPTIONS**





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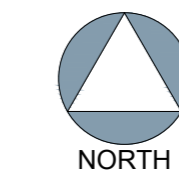
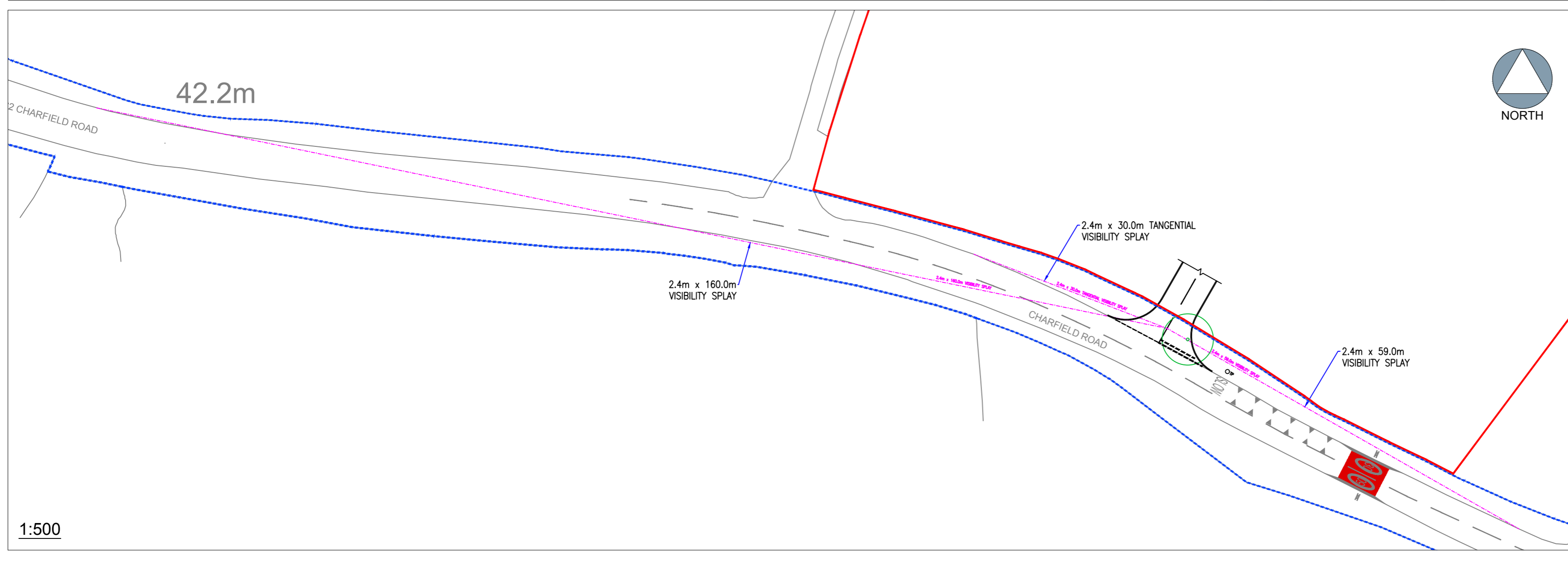
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**KEY**

- SITE BOUNDARY
- - - HIGHWAY BOUNDARY

**PRELIMINARY**  
DRAWING/DESIGN IS STILL 'IN DEVELOPMENT'  
YOU ARE ADVISED TO MAKE DUE ALLOWANCE



Rev	Description	Date	By	Chkd
-	-	-	-	-



Client	
Project Name CHARFIELD ROAD, KINGSWOOD	
Title PROPOSED ACCESS WITH VISIBILITY SPLAYS	
Project Phase PRELIMINARY	
Client Drawing No. -	Scale NTS (AT A2 SIZE)
PBA Drawing No. 801.8001.001	Drawn Date 25.10.18
Revision -	

Project Name:	Charfield Road, Kingswood	
Document Reference:	801.0001/TN/1	
Document Name:	Technical Note	
Prepared By:	[REDACTED]	
Checked By:		
Approved By:		

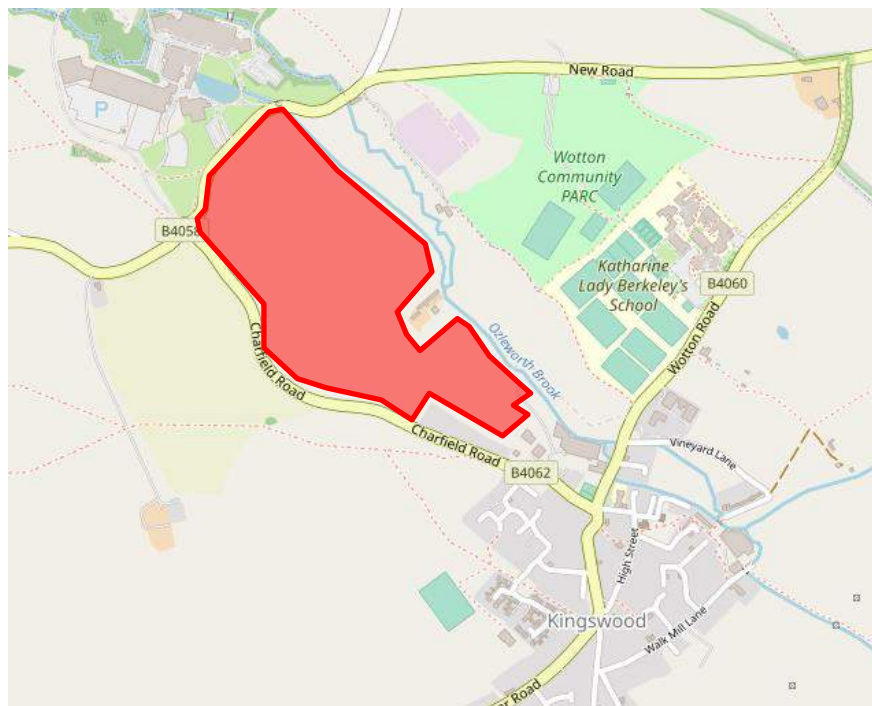
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**1. INTRODUCTION**

1.1 This Technical Note (TN) has been prepared by Paul Basham Associates on behalf of Redrow Homes to support site allocations and potential public transport infrastructure improvements in relation to an application of circa 300 homes along Charfield Road, Kingswood. The site location is shown below in **Figure 1**.



**Figure 1:** Site Location

1.2 This Technical Note will explore the existing public transport options available, the committed developments and site allocations coming forward as well as the proposed bus services that are likely to come forward.

## 2. EXISTING PUBLIC TRANSPORT CONDITIONS

2.1 Within the vicinity of the proposed development site, the nearest bus stops are located approximately 450m east of the site along Charfield Road. The stops are served by buses providing connections to nearby towns such as Gloucester and Thornbury. The bus stops are marked by a pole with a timetable attached highlighting the services available. A summary of the bus services operating from these stops can be seen below in Table 1.

Bus Number	Bus stop location	Route	Operator	Frequency		
				M-F	Sat	Sun
60	Charfield Road	Gloucester-Dursley-Thornbury	Stagecoach	Every 2 hours	Every 2 hours	No Service
84/85	Charfield Road	Yate- Wotton-under-Edge via Wickwar-Charfield-Hawkesbury Upton	Stagecoach	Every hour		No Service
626	Charfield Road	Wotton-under-Edge- Bristol	Eurotaxis	One service a day	No Service	No Service
S8 (School Service)	Wotton Road (Railway Tavern)	Wickwar – Chipping Sodbury – Yate – Rangeworthy – Iron Acton – Charfield – Kingswood	Taylor's Travel	1 service a day at 0810 and at 1454	No Service	

**Table 1:** Existing Bus Services

2.2 From looking at **Table 1** it is demonstrated that there are regular bus services Monday to Saturday, with the 84/85 service provide hourly buses.

2.3 The 60, 85, S8 and 626 bus services operate within Charfield, however, Charfield is subject to a number of additional services, as demonstrated within **Table 2**.

Bus Number	Bus stop location	Route	Operator	Frequency		
				M-F	Sat	Sun
63	Charfield Road	Forest Green – Nailsworth – Stroud – Whiteshill – Gloucester	Stagecoach	1 service a day at 0703 and at 1705	No Service	
X6 (School Service)	Wotton Road (Railway Tavern)	Sharpness – Berkeley – Stone – Charfield – Katherine Lady Berkeley School; Kingswood	Taylor's Travel	1 service a day at 0750 and at 1450	No Service	

**Table 2:** Existing Bus services within Charfield

- 2.4 It is demonstrated in **Tables 1** and **2**, that there would be an opportunity to increase the bus frequencies within the area to encourage more trips to be made by sustainable modes.

### 3. COMMITTED DEVELOPMENT AND SITE ALLOCATIONS

3.1 The villages of Wotton-under-Edge and Kingswood are located within Stroud District, while Charfield is located within South Gloucestershire. Within both Local Plans of the aforementioned districts, there are multiple developments outlined within all these villages. A map highlighting all of the committed developments and site allocations is included as **Appendix A**.

#### **Wotton-under-Edge**

3.2 Within Wotton-under-Edge several employment developments are coming forward including:

- Tabernacle Road – Allocated 2015 Local Plan employment development (EK36); and
- Renishaw Old Town – Allocated 2015 Local Plan employment development (EK37).

3.3 Both of these sites will include the regeneration of existing commercial sites, and will be key in meeting the employment infrastructure criteria.

#### **Kingswood**

3.4 Within Kingswood, there are also multiple developments that are proposed within both the Stroud 2015 Local Plan and the Emerging Local Plan including:

- S/20/1083/OUT – Pending application for up to 50 dwellings which is located opposite the proposed development site;
- Abbey Mills Industrial Area – 2015 Local Plan Employment allocation for a development located to the east of the proposed development (EK19);
- Renishaw New Mills – 2015 Local Plan Employment allocation for a development of B1,B2 and B8 uses (EK17);
- Renishaw – Adjacent to the aforementioned site, there is a further allocated employment site outlined in the emerging Local Plan for a development of 10 hectares specifically for B1,B2 and B8 uses (PS47); and
- South of Wickwar Road – Emerging Local Plan housing allocation for up to 50 dwellings (PS38).

3.5 Utilising the information provided by the Census 2011 Data, there are approximately 784 households within Kingswood, if all of the aforementioned residential developments come forward there will be 400 additional residential dwellings built (this includes the Redrow site) totalling 1184 dwellings in Kingswood. This equates to a 51% increase in the number of households located within Kingswood.

### **Charfield**

3.6 Charfield Village also has multiple employment and housing developments allocated in the adopted and emerging Local Plans, the 2013 Core Strategy and the Policies, Sites and Places (PSP) Plan, including:

- PSP47 in the PSP of the South Gloucestershire Local Plan – Land safeguarded for the opening of the Charfield Railway Station;
- P19/18337/O – Pending hybrid planning application for 250 residential dwellings, and community/employment use (0.28ha for B1,D1/D2 use). This site did make up a former Joint Spatial Plan allocation;
- PT16/6924/O & P19/8564/RM – Committed development of 115 residential dwellings and a Class A1 retail unit;
- PT16/0462/O & PT16/6580/RM – Further committed development of 64 residential dwellings;
- P19/2452/O – Pending application for 525 homes, new neighbourhood centre and a 3FE Primary School.

3.7 Utilising information outlined with South Gloucestershire's *'Population, household and housing statistics for towns and parish areas in South Gloucestershire (2013)'* there were approximately 974 occupied households within Charfield at the time of the 2011 Census. If all of the aforementioned residential developments come forward, there will be an additional 954 homes built in Charfield, totalling 1928 homes. This therefore equates to a 98% increase in the number of homes in the settlement.

### **Summary**

3.8 It is identified that there are significant plans for growth across Wotton-under-Edge, Kingswood and Charfield, with a potential increase of 51% of homes in Kingswood and nearly doubling of the existing settlement at Charfield. Making reference to the expected increase in both housing and employment sites, this would therefore provide the opportunity to deliver an improved public transport offer, taking advantage of the expected

population increase in each of these three settlements, due to residents and employees.

#### 4. PUBLIC TRANSPORT PROPOSALS

- 4.1 Due to the increase in the number of proposed residential dwellings and commercial developments across the study area, there will be an increased demand for regular public transport options to provide links to the surrounding area as well as Gloucester and Bristol. As mentioned previously, as outlined within PSP47 in the PSP of the South Gloucestershire Local Plan (2017), a Rail Station within Charfield has been identified as a key piece of proposed infrastructure.
- 4.2 In addition to this, Stagecoach Bus Company have been consulted in relation to the potential of an additional service that would serve the aforementioned villages before linking into Thornbury. Stagecoach have provided a Regulation 18 Preferred Strategy to the Stroud District Local Plan in relation to the provision of additional services and infrastructure in the area.
- 4.3 Within the response, they have outlined that multiple services located within the Stroud District need to be updated from the 'Tier 2' category in the Bus Network Strategy to a 'Tier 1' status, defined as a frequency of at least 30 minutes frequency. Based off this, the response identifies an additional route to be provided between the A38 and Thornbury linking to Wotton via Charfield and Kingswood mainly via the B4062 and the B4058. This route has been included in the site allocations map (**Appendix A**).
- 4.4 With the combined increase of circa 1,354 dwellings across both Charfield and Kingswood as well as a proposed push for residents of these areas to start to make the switch to more sustainable modes of transport, an additional bus service would be well supported in the proposed location. The combined development proposals (both residential and employment) could provide the initial funding in order to initiate the service and as the development proposals are built out, these will provide the passenger demand in order to continue the viability of the services going forward.

##### **Proposed Greenway**

- 4.5 As outlined with the Emerging Stroud Local Plan, there is proposed to be a Greenway linking Wotton-under-Edge, Charfield and Kingswood. While there is no specified route at this stage, the Charfield Neighbourhood Plan outlines Policy 015, stating: 'The Parish Council will work with the District Council, neighbouring Parish, landowners and developers to secure a foot/cycleway to Wotton & Kingswood. Major new development in Charfield

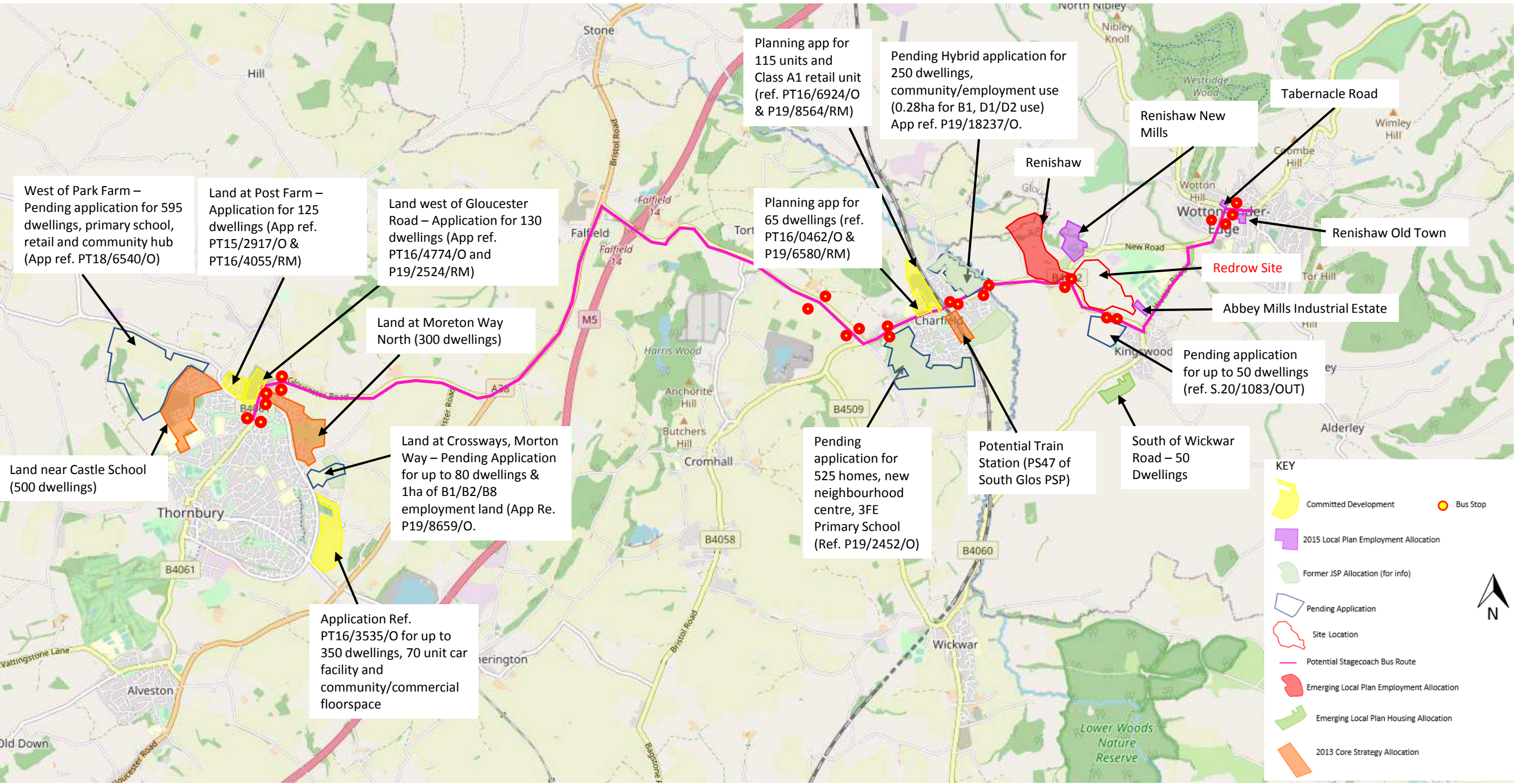


should as appropriate accommodate, connect and or make contributions towards the proposed Greenway'. The Redrow development site will look to link into the Greenway once a route has been specified in more detail.

## 5. SUMMARY AND CONCLUSIONS

- 5.1 This Technical Note has been prepared by Paul Basham Associates on behalf of Redrow Homes to support site allocations and potential public transport infrastructure improvements in relation to an application of circa 300 homes along Charfield Road, Kingswood.
- 5.2 The site and surrounding areas are currently collectively served by the 60, 63, 84/85,S8, X6 and the 626 bus services, with some of these services operating school services only, one service a day with the remainder of these services operating every 1 or 2 hours with no services on Sundays. This level of service is reflective of the existing rural settlements and current populations.
- 5.3 If all of the proposed residential development sites that are currently allocated within their respective Local Plans were to come forward, there will be an additional 1,354 dwellings built within both Charfield and Kingswood. Taking this, along with the proposed employment sites into consideration, will further result in additional passenger demand for the existing services in the area.
- 5.4 Stagecoach have provided a Regulation 18 Preferred Strategy to the Stroud District Local Plan in relation to the provision of additional infrastructure in the area, stating that an additional service to be provided between the A38 and Thornbury linking to Wotton via Charfield and Kingswood mainly via the B4062 and the B4058.
- 5.5 In summary, this TN has demonstrated that there is a need for additional public transport infrastructure within Wotton-under-Edge, Kingswood and Charfield due to the number of housing and employment site allocations that will be coming forward and would be supported by Stagecoach Bus Company. The bus and Greenway routes would be secured through discussions with landowners and developers with a steer from the District Councils to ensure that the infrastructure can be delivered for the benefit of the wider area.

## Appendix A



West of Park Farm – Pending application for 595 dwellings, primary school, retail and community hub (App ref. PT18/6540/O)

Land at Post Farm – Application for 125 dwellings (App ref. PT15/2917/O & PT16/4055/RM)

Land west of Gloucester Road – Application for 130 dwellings (App ref. PT16/4774/O and P19/2524/RM)

Land at Moreton Way North (300 dwellings)

Land at Crossways, Morton Way – Pending Application for up to 80 dwellings & 1ha of B1/B2/B8 employment land (App Re. P19/8659/O).

Application Ref. PT16/3535/O for up to 350 dwellings, 70 unit car facility and community/commercial floorspace

Planning app for 115 units and Class A1 retail unit (ref. PT16/6924/O & P19/8564/RM)

Pending Hybrid application for 250 dwellings, community/employment use (0.28ha for B1, D1/D2 use) App ref. P19/18237/O.

Planning app for 65 dwellings (ref. PT16/0462/O & P19/6580/RM)

Pending application for 525 homes, new neighbourhood centre, 3FE Primary School (Ref. P19/2452/O)

Potential Train Station (PS47 of South Glos PSP)

South of Wickwar Road – 50 Dwellings

Pending application for up to 50 dwellings (ref. S.20/1083/OUT)

Tabernacle Road

Renishaw New Mills

Renishaw

Renishaw Old Town

Redrow Site

Abbey Mills Industrial Estate

**KEY**

- Committed Development
- 2015 Local Plan Employment Allocation
- Former JSP Allocation (for info)
- Pending Application
- Site Location
- Potential Stagecoach Bus Route
- Emerging Local Plan Employment Allocation
- Emerging Local Plan Housing Allocation
- 2013 Core Strategy Allocation
- Bus Stop



**APPENDIX D**  
**LANDSCAPE STRATEGY**

# DRAFT



LAND NORTH OF  
CHARFIELD ROAD  
KINGSWOOD

## LANDSCAPE STRATEGY

PREPARED BY PEGASUS GROUP  
ON BEHALF OF REDROW HOMES (SOUTH WEST)  
P20-2437\_01 NOVEMBER 2020

Revisions

-	November 2020	Draft Issue -			









## Vision

The Landscape Strategy will ensure that the site promotion at Kingswood provides an attractive sense of place that responds to local character and distinctiveness, biodiversity, sustainable transports movements and healthy lifestyles for future generations.

## 2 | INTRODUCTION

- 2.1 This Landscape Strategy has been prepared by Pegasus Group on behalf of Redrow Homes in support of the site promotion of Land North of Charfield Road, Kingswood.
- 2.2 This strategy reviews the existing landscape character and visual amenity for the Site to help inform the Strategic Landscape Masterplan. This document has been produced to aid and help inform discussions with Stroud District Council and other local stakeholders.
- 2.3 As set out within the Site Promotion Document there is the opportunity for the development of 300 homes as well as the delivery of a new two-form entry primary school within the site.
- 2.4 Part one of this Landscape Strategy provides a baseline study for the scheme identifying the existing assets within the site and its surroundings. Within Part two a review of the site's opportunities and constraints will aid the development of a Strategic Landscape Masterplan which will set out how a scheme can protect and enhance the existing landscape framework and create a new place for people to live and play and where biodiversity will prosper.
- 2.5 The site location plan is shown on the Figure 1.



Figure 1: Site Location Plan



2.6 The promotion of landscape or green Infrastructure is well supported at the national and local level and is a key driver within the Redrow 8 place making principles which seek to deliver thriving places for people to live.

2.7 Each green infrastructure asset provides a range of existing functions and has the potential, through a considered and planned approach, to provide additional targeted functions.

2.8 The typical principles of Green Infrastructure that are to be considered as part of this study include:


- **Multi-functionality** - an ecosystem services<sup>1</sup> led approach to integrate with, contribute to and enhance natural systems;
- **Interconnectivity** - with the connection of urban and countryside areas whilst creating new recreational facilities;
- **Connectivity** - avoid fragmentation of existing habitats, and natural features, to increase potential for natural regeneration and migration of species of flora and fauna associated with the affects of climate change;
- Contribute to **protection, conservation** and long term management of the local landscape;
- **Maintain and enhance biodiversity**, ensuring that development results in net gain of biodiversity assets;
- Provide a focus for **social inclusion**, community development and lifelong learning; and
- Be designed and managed to a high standard of quality to deliver **social, economic and environmental benefits**.

2.9 In addition, the Landscape Strategy and strategic design proposals that have the ability to help deliver a cohesive and high quality development that:

- Encourages and promotes healthy active lifestyles through the provision of high quality, safe and accessible open space for leisure, recreation and play;
- Supports local landscape character to provide an attractive sense of place whilst considering visual amenity;
- Creates and supports inclusive, safe and cohesive communities;
- Protects and enhances existing green infrastructure assets to be enjoyed and valued by everyone for future generations;
- Protects, creates and supports habitats that enable biodiversity, habitats and species to survive and thrive;
- Enhances connectivity to promote and facilitate sustainable travel movements; and
- Is resilient and adaptive in the face of climate change.

Footnote<sup>1</sup> - The term 'ecosystem services' is defined by the UK National Ecosystem Assessment as "The benefits provided by ecosystems that contribute to making human life both possible and worth living."





**PART 1**  
**UNDERSTANDING THE SITE AND THE**  
**SURROUNDING CONTEXT**

# 3 | THE SITE & SURROUNDING CONTEXT

## The Site

- 3.1 The site is located on the north west edge of Kingswood with the Renishaw employment site positioned to the north west of the site.
- 3.2 Comprising two parcels of land dissected by an existing track, the site is currently used for agricultural (arable) use. The site is bounded by existing vegetation on all boundaries and along internal field boundaries. Access between the fields which comprise the site is provided via agricultural field gates set within the hedgerows which define the broadly rectilinear shaped fields. The southern edge of the site is bounded by Charfield Road (B4062) and the northern western edge with New Road (B4058) as highlighted on Figure 2.
- 3.3 In addition to the well maintained hedgerows that define the site's external boundaries, the internal fields boundaries are similarly defined with mixed species hedgerows and occasional hedgerow trees. Agricultural drainage ditches run along some of the internal field boundaries.
- 3.4 Scattered mature broad-leaf trees demarcate the watercourse along the site's eastern edge. Occasional gaps are present within the vegetation that runs along the north eastern boundary of the site. A number of mature trees are scattered along the western edge of the site adjacent to Charfield Road.
- 3.5 Access into the site is provided via an existing farm access track which connects Merryford Farm to Charfield Road. Merryford Farm is located between the eastern and western parcels of the site and is outside the site's boundary.
- 3.6 There are no Public Rights of Way (PRoW) crossing the site.
- 3.7 The Abbey Mills Industrial Estate is located to the south-east of the site, and provides a local employment area in addition to the Renishaw site to the north-west. Agricultural land and Merryford Farm are located to the north, west and north-west of the site, with Kingswood adjoining the southern boundaries. A row of properties on Charfield Road are located on the southern boundary of the site with the converted Langford Mill found to the east of the southern field.
- 3.8 South west of the site beyond Charfield Road lies agricultural farmland with a Public Right of Way leading from Kingswood, west towards Charfield.

## Ecology

- 3.9 Preliminary ecological surveys (undertaken by others) have considered the baseline ecology features of the Site including potential species and habitats that would need to be considered as part of a scheme. These recommendations are set out within Section 6.

## Topography

- 3.10 The landform of the site slopes gently towards the Cotswolds escarpment to the north east of the site with c. 49m above Ordnance Datum (AOD) being the highest point of the site on the southern boundary. The landform within the site falls away to the north at approximately of c.38 AOD.

## The Site's Surrounding Context

- 3.11 As highlighted on Figure 2, there are a number of educational, employment and community facilities within the surrounding of the site.

## Land Uses

- 3.12 Kingswood is located 2km to the south of Wotton-Under-Edge and 3.2km to the east of Charfield. The settlement of Kingswood comprises a primary school, village hall, church, shops and post office as well as a public house. To the south west of the village centre, in association with the village hall there is a recreational ground and allotment site.
- 3.13 To the west of the site is Hopyard Farm with associated fields used for equestrian activities. To the north of the farm is the sewage treatment works which is accessed from New Road. The facility includes a number of tanks and a pumping station. Within the wider landscape there are other farmsteads within the agricultural landscape in between the larger settlements.
- 3.14 There are two employment sites including Renishaw to the north west and the Abbey's Mill Industrial Estate to the south east of the site. Within the Stroud District Local Plan Review Draft Plan for Consultation (Nov 2019) a further employment allocation (PS47) is proposed to the north west of the site within the Renishaw Employment site
- 3.15 Katharine Lady Berkeley's Secondary School is located approximately 0.6km to the east of the site with associated sports pitches (including floodlights). The Wotton Sports Centre is located to the south of the school, with Wotton Rugby club, and the Wotton skate park and pump track within this community recreation area. Kingswood Primary School is situated approximately 0.8km to east and within close walking distance of the site.

















-  Site Boundary
-  Emerging Employment Allocation (PS47)
-  Public Rights of Way (PRoW)
-  Education
-  Sports Pitches
-  Wotton Skate Park and Pump Track
-  Community - Sports Provision
-  Agricultural Land
-  Allotments
-  Village Hall
-  Employment Site
-  Village Centre

Figure 2: Site Context Plan



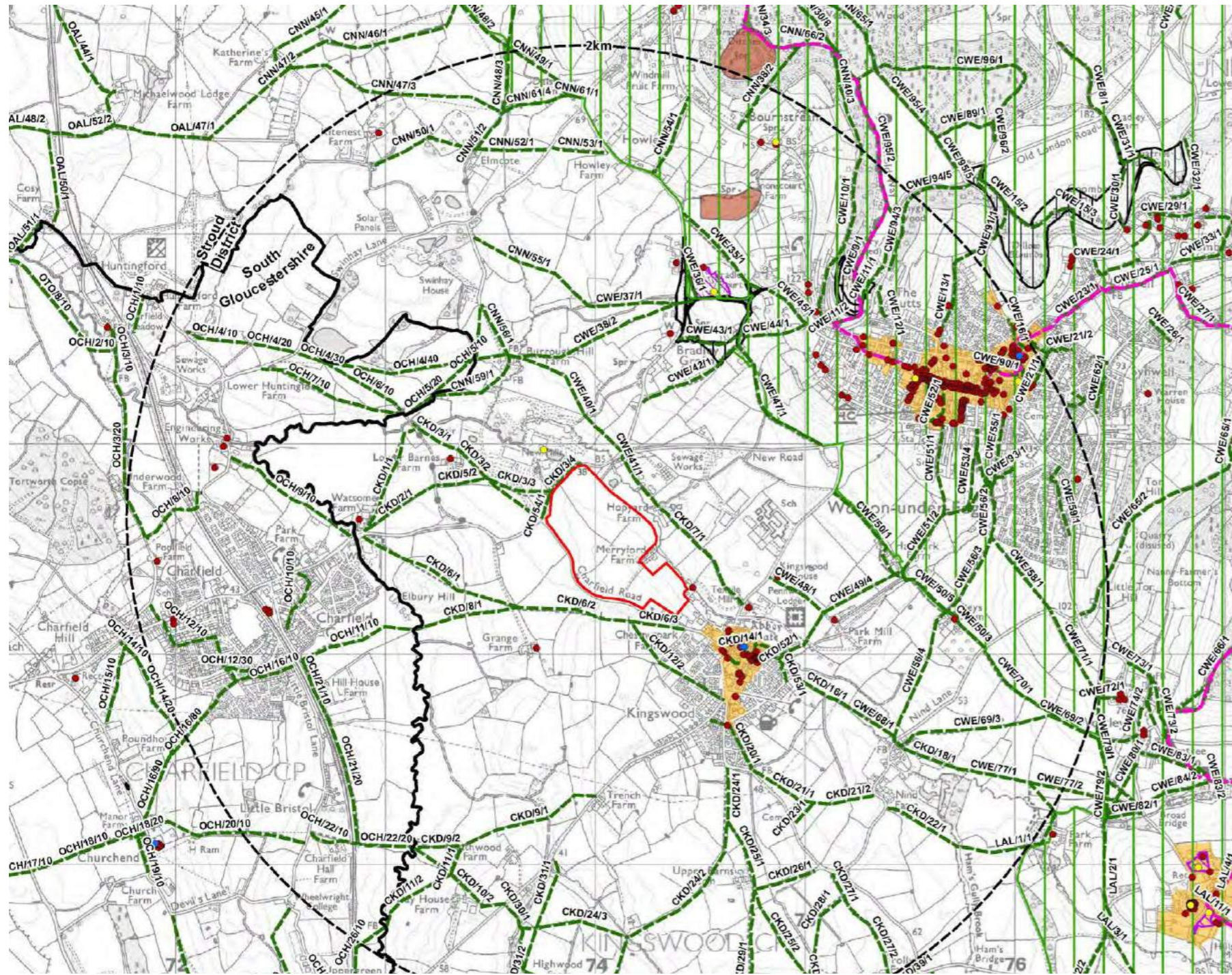
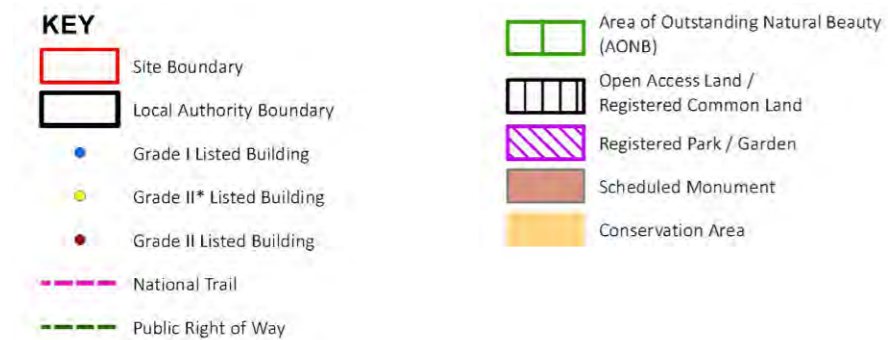


Figure 3: Environmental Designation Plan



3.16 The Monks Meadow scheme at Tyndale View is located south of the site, opposite the industrial estate off Charfield Road. Within this development there is a small play area.

3.17 An area north and west of the site along Ozleworth Brook is defined as Environment Agency Flood Zones 2 + 3.

#### Access

3.18 The M5 motorway located 6.5km to the west provides transport connections to the wider highways network via Junction 14. At the local level a number of B roads provide access between settlements, with smaller rural lanes providing further links.

3.19 Bus routes around the local area provide access to the site with bus stops located along Charfield Road.

3.20 At a local level there is a network of PRoW (as shown on Figure 3) within the vicinity of the site, that provides access between the settlements around Kingswood and to the Cotswolds Way, as well as the Monarchs Way recreational trails. In addition to this, there are local connections provided by a number of bus routes within the vicinity of the site with bus stops along Charfield Road.

#### Surrounding Topography

3.21 Beyond the site the land rises to the north east towards the Cotswolds escarpment within the AONB. This provides a ledge within the local landscape with rolling farmland below with dispersed settlements connected by the aforementioned road network. Wotton Hill is located on the Cotswolds escarpment and provides a panoramic viewpoint above the settlement of Wootton under Edge.

#### Designations

3.22 The site is not subject to any ecological, landscape or heritage designations. Figure 3 illustrates the environmental designations within the vicinity of the site.

3.23 Langford Mill (Grade II Listed Building) has been converted to residential dwellings and administrative offices and is situated on the eastern corner of the site. The context and setting would be considered within the development proposals. Beyond the site, within Kingswood there are a number of other listed buildings with part of the settlement covered by a Conservation Area designation.

3.24 Beyond the site, the scheduled monument at Brackenbury camp hillfort is located on the wooded Cotswolds Escarpment approximately 2.1km to the north of the site northern boundary. The hillfort is one of a number of features along the escarpment, with the William Tyndale Monument also located to the north of the site.

3.25 The Cotswolds Area of Outstanding Natural Beauty (AONB ) is located to the north of the site. The Cotswolds Way National Trail runs through the AONB and provides a recreational route along the escarpment in addition to the PRoW which cross areas of the Open Access Land.

#### Landscape Character

3.26 The site is located on the southern edge of the Stroud District, the Cotswolds National Character Area (NCA 107) to the east, with the Cotswold AONB being a distinctive feature within the area. The Site itself is located within the Bristol, Avon Valleys and Ridges National Character Area (NCA 118).

3.27 At the national level, this character area study sets out high level, strategic guidance for managing the landscape, nature conservation and biodiversity improvements to be considered at the local level.

#### Gloucestershire Landscape Character Assessment (2006)

3.28 At the county level, the Gloucestershire Landscape Character Assessment locates the site within the SV 5A Kingswood and Wick Vale character area, and within the Unwooded Vale landscape character type. Key characteristics of this character type are listed below:

- A broad, gently rolling landscape that become gentler in places, and appearing almost flat in the context of the wider landscape, together with intermittent locally elevated areas;
- Open, productive agrarian landscape with mixed pasture and arable fields; dominance of improved pastures on heavier clays and arable farmland on freer draining soils;
- Medium to large scale mosaic of hedged fields with a combination of both regular and irregular field pattern;
- Narrow floodplains bordering the streams and small rivers that drain the vale, with occasional locally incised streams;
- Sparsely settled agrarian landscape with nucleated pattern of rural villages and scattered farms and dwellings. Few towns or other urbanising influences give the landscape a strong rural character;
- Woodland is not a characteristic of the landscape although scattered hedgerow and streamside trees, and occasional copses and shelter belts, can sometimes give the impression of a well treed landscape;
- Surrounding hills, ridges, escarpment and outliers form a backdrop to many views across the Vale; and
- Quiet rural lanes connecting settlements and numerous isolated farms and hamlets.

3.29 The study notes the influence of the M5, main line railway and the broad vale which extends along the foot of the Cotswolds escarpment as being features within the Unwooded Vale character type. The description of the character type notes that the “M5 motorway is intrusive, both visually and physically, and contributes to the settled character of the vale. However, its area of influence is confined to this northern side of the character area.”

3.30 Whilst the study notes that “the overall character of the landscape is distinctly rural, small scale and domestic” the document recognises the settlement pattern within the landscape including farmland at the base of the escarpment with clusters of villages and settlements of varying size bordering the lower slopes.

3.31 The study notes that field boundaries are defined by hedgerows, with some stone walls in places (including within the Kingswood area) which hints at the influence of the Cotswolds. In terms of a managed landscape, it also states how the “hawthorn hedgerows [that] define a patchwork of moderate and large fields...are often well maintained and give the sense of a managed productive agricultural landscape.”

3.32 Hedgerow trees are also noted as being conspicuous across the vale landscape with the potential of offering habitat value for a range of species being highlighted. In addition, the study notes how woodland cover is not a characteristic feature of the area, however copses along streams for parts of the landscape with the treelined uses to identify where many watercourses are located.

3.33 The Gloucestershire Landscape Character Assessment notes how “Kingswood is the largest settlement in the character area, and has a distinctive nuclear form clustered around the junction of a number of minor roads.” It also acknowledges how more recent developments “are prominent in the approaches to the village”.

3.34 In terms of materiality, it notes that there are a mix of building styles within Kingswood “with a number of old stone properties, notably within its historic core, and stone wall boundaries. Elsewhere, the rural landscape is settled with scattered farms and dwellings throughout the vale, frequently set back from roads and accessed via minor tracks.”

3.35 It notes how the road pattern is “relatively sparse, with narrow country lanes bordered by hedgerows and grass verges, as well as stone walls in some areas.”

3.36 The network of PRoW is acknowledged, with specific referent to the areas to the north and south of Kingswood being more accessible due to the extensive network.



1: View towards Langford Mill and the site from PRoW with Kingswood beyond.  
 2: View towards the site from PRoW by Hopyard Farm  
 3: View from the Skate Park and Pump Track car park towards the Katharine Lady Berkeley’s Secondary School and community sports pitches and floodlights.

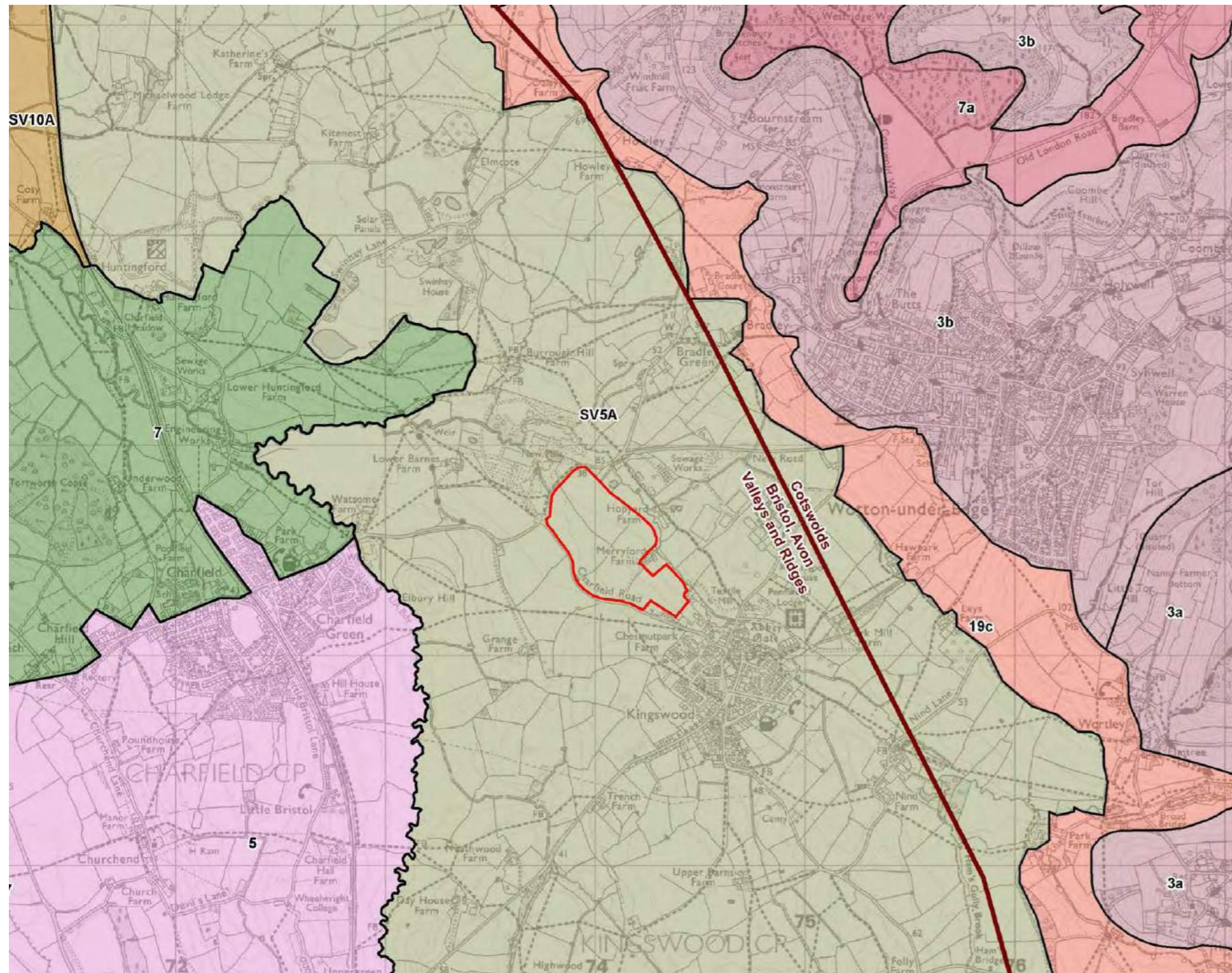


Figure 4: Landscape Character Areas Plan

**KEY**

- Site Boundary
- National Character Areas
- Character Area Boundary

**South Gloucestershire Landscape Character Assessment (2014)**

- Character Types**
- Parkland Vale 05: Wickwar Ridge and Vale
  - Shallow Ridge 07: Folfield Vale

**Gloucestershire Landscape Character Assessment (2006)**

- Character Types**
- Low Wooded Cambrian Hills SV10A: Michael Wood Hill
  - Unwooded Vale SV5A: Kingswood and Wick Vale

**Cotswold AONB Landscape Character Assessment (2004)**

- Character Types**
- 03. Rolling Hills and Valleys
    - 3a: Ozleworth Bottom and Lower Kilcott
    - 3b: Stinchcombe and North Nibley
  - 07. High Wold
    - 7a: Nympsfield and Kingscote Plateau, and Minchinhampton Common
  - 19. Unwooded Vale
    - 19c: Wickwar Vale

**Stroud Landscape Assessment (2000)**

3.37 The Stroud District Landscape Assessment (a Supplementary Planning Guidance document) addresses the landscape character at the local scale. Whilst the Stroud Landscape Assessment precedes the Gloucestershire Landscape Character Assessment a number of the key characteristics are correlated between the guidance documents. However, it is worth noting that the landscape around the site and Kingswood has developed and seen many changes since this document was produced.

3.38 Whilst the site is not situated within the escarpment character type, it is noted that due to the physical and visual characteristics of the escarpment, it is sensitive to change from some of the surrounding areas including the lower lying areas.

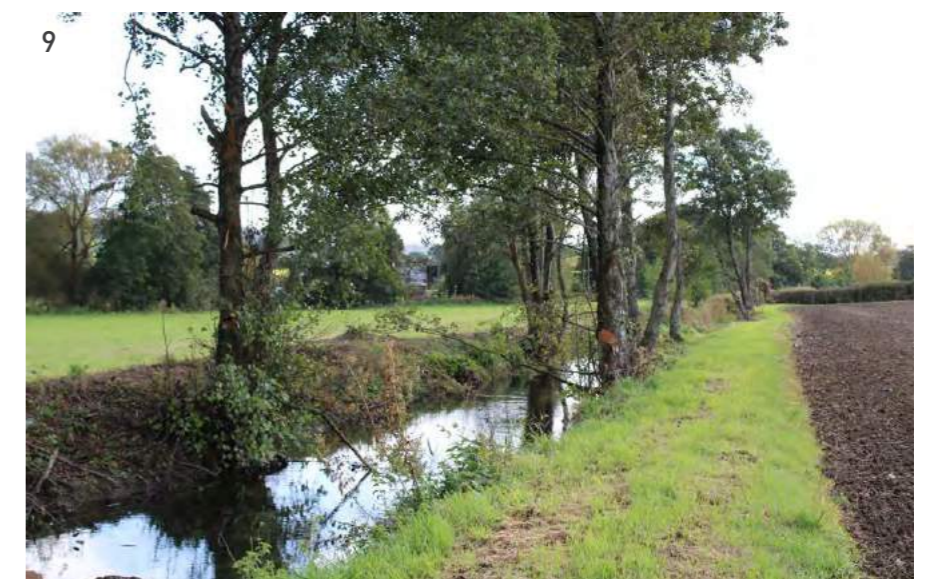
3.39 The Site is located within the Kingswood Vale and the key characteristics of this character type are included below:

- Irregular undulating to locally broken, rolling terrain, becoming more gentle to south;
- Transitional landscape from Cotswold Escarpment footslopes to Severn Vale lowlands;
- Medium scale fields with a mix of regular / irregular enclosure pattern;
- Mixture of pasture and arable land use;
- Frequent hedgerow as and oak and small farm woodlands becoming fewer to the south;
- Visually semi-enclosed to open, with more outward distance views to south;
- Alder and willow along stream courses; and
- Buildings of red brick and stone.

3.40 It is noted that the Kingswood Vale is considered within the setting of the town of Wotton-under-Edge and the wider AONB landscape. It is acknowledged that “when viewed from the escarpment the existing larger scale buildings, such as the school to the north of Kingswood, are prominently visible and give an indication of the likely impact of any other new buildings and development of this scale”.

3.41 The character type summarises that “given its generally open character, particularly to the south where there is the greater density of settlement, this landscape is sensitive to further large scale development.” However, as discussed above, and set out within the landscape and visual section, the Renishaw site and school provide prominent features within the landscape within the setting of the Cotswolds escarpment.

3.42 A priority within the landscape assessment includes to discourage the removal of hedgerows, encourage the replanting of orchards, as well as the protection of small streams and related wetland habitats throughout the area.



3.43 Key priorities for action for the Kingswood Vale character type are to:

- Ensure strict control of any future development to protect the predominantly rural character of the area;
- Conserve the high quality views from the AONB escarpment;
- Ensure the implementation of appropriate landscape schemes for any development to maximise integration within the landscape pattern and minimise visibility from the AONB; and
- Encourage sympathetic redevelopment of vernacular buildings such as mills and farm buildings to retain local character.

3.44 The land use and landscape pattern description notes the visual backdrop of the Cotswolds Escarpment which forms a key feature within the local area noting its high scenic quality. Reference is also made to the road and PRoW network, noting that roads and lanes radiate from Kingswood providing connections into the wider area and neighbouring settlements.

### Landscape Character of the Site

3.45 The site displays a number of the characteristics discussed within the published landscape assessments. The eastern boundary of the site is defined by the tree lined watercourse which is a characteristic of how the watercourses are defined within the character type. The character of the site is rural however there are a number of urbanising influences within the site and it's immediate context.

3.46 The fields which comprise the site are divided and bounded by hedgerows with some hedgerow trees. There is a sense of tranquillity, however, the settled context to the south and south-east reduces the sense of rural isolation and remoteness in combination with Charfield Road, New Road and the Renishaw Site to the north.

3.47 Outward looking, the wooded Cotswold escarpment provides an physical and visual influence on the site its surroundings. From the site, the scarp is viewed within the context of farmsteads dotted within the landscape on the lower slopes, the edge of Wotton-Under-Edge and the Renishaw employment site.

4: View towards Charfield from within the site

5: Renishaw site boundary on New Road

6: William Tyndale Monument

7: Public right of way by Renishaw entrance at the Renishaw Roundabout

8: View from the access track towards the Cotswold escarpment

9: Tree lined watercourse denoting the site's eastern edge

# 4 LANDSCAPE PLANNING POLICY CONTEXT

4.1 The following section outlines the landscape policy context for the site to be considered in the development of this Landscape Strategy.

## National Policy and Guidance

### National Planning Policy Framework (NPPF)

4.2 The NPPF (2019) aims to protect the environment and to promote sustainable growth noting that high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities. It states in paragraph 171 that:

“Plans should(...)take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure”

4.3 In paragraph 96 of the NPPF it states that:

“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.”

4.4 The NPPF also notes the requirement to conserve and enhance landscape and scenic beauty in places such as AONBs as well as protecting biodiversity and recognising the character and beauty of the countryside and the wider benefits from natural capital and ecosystem services.

4.5 In paragraph 172 of the NPPF it states that:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads<sup>54</sup>. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development<sup>55</sup> other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Footnote 55 from the NPPF - “For the purposes of paragraphs 172 and 173, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

## A Green Future – Our 25 year Plan to Improve the Environment (2018)

4.6 The 25 year environment plan sets a number of goals including to achieve “enhanced beauty, heritage and engagement with the natural environment”. It recognises the actions required to help focus policy on the environment in order to safeguard natural assets and managed environmental pressures in order to experience the many benefits.

## The Natural Environment White Paper – The Natural Choice: Securing the Value of Nature (2011)

4.7 This statement outlines the Government’s vision for the natural environment over the next 50 years. It recognises the need for...

“Urban Green Infrastructure to complete links in our national ecological network. Urban green space allows species to move around within, and between, towns and countryside.”

## Natural England: Green Infrastructure Guidance (2009)

4.8 Natural England’s GI guidelines states that GI:

“Should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types...”

## Local Policy & Guidance

### Stroud District Local Plan (2015)

4.9 The Stroud Local Plan sets out key issues and priorities for different areas of the district. The ‘Wotton Cluster’ in which the site is located is centred around the settlement of Wotton-under-Edge as a local service centre, and notes that Kingswood is a “settlement with limited facilities” however there is potential growth for employment areas within this area.

4.10 As well as addressing local issues such as school capacity for Kingswood, the key issues and priorities for the ‘Wotton Cluster’ that are relevant to the Landscape Strategy below “conserving and enhancing Stroud District’s countryside and biodiversity” and “achieving a better transport system”.

4.11 Guiding principles for the Wotton Cluster include conserving and enhancing the area’s heritage assets, high quality, distinctive design and local identity and character. It also mentions conserving and enhancing the high quality natural landscape, including the Cotswolds AONB and its setting.

