

## Stroud Local Plan Review

### Emerging Strategy Paper: Response to Questions

**Organisation/Company:** RPS Group

**Client Name/Organisation:** Redrow Homes Ltd

**Response to Questions:** 1.0a, 1.0b, 2.1a, 2.3a, 2.3b, 3.2a, 3.2b, 4.2a, 4.2c, 4.2d, 4.4a, 4.4e, 5.0a, 5.0b, 5.0c, 5.0d and 5.1a.

#### **Key Issues**

##### Question 1.0a and 1.0b

No - Whilst it is recognised that 'Ensuring that new housing development is located in the right place, supported by the right services and infrastructure, to create sustainable development' is included as Issue 1 within the Emerging Strategy Paper, we also recommend that the issues listed below are included as 'top key issues' to be addressed through the Local Plan Review or at the very least used as objectives to work proactively towards achieving Issue 1:

- Meeting the District's identified future housing needs.
- Working with neighbouring authorities to meet the needs of the housing market area, and in particular Gloucester City.

These two 'top key issues' set the context for tackling the 5 key issues. The outcome of talking the 5 key issues should be the fulfilment of 'top key issues'. This is the requirement of NPPF paragraph 20a and 23.

#### **Local Economy and Jobs**

##### Question 2.1a

No - We would re-iterate that in terms of supporting the local economy the Local Plan Review should seek to retain and support the working age population by ensuring that an adequate supply and mix of housing is provided to meet employer needs. As such, it is imperative that the Local Plan Review allocates enough housing land to ensure family housing, as well as life time homes and assisted living accommodation is realistically available to people within the District over the plan period.

#### **A Local Need for Housing**

##### Questions 2.3a and 2.3b

Redrow Homes support the Local Housing Needs Assessment which is being undertaken by Stroud District in collaboration with Local Authorities in Gloucestershire. Support is also provided

to Stroud District's commitment to working with the JCS Authorities to help address the issue of the housing shortfall for Gloucester City under the 'Duty to Cooperate'. It is however imperative that any requirements for Stroud District to help meet the housing needs within neighbouring authorities via the 'Duty to Co-operate', is meaningful and fully collaborative.

The District will be required to allocate a number of additional development sites to not only meet the needs of the District but possibly also Gloucester City/JCS Authorities under the 'Duty to Cooperate'.

It is imperative that the land being allocated for future housing is deliverable and free from physical, ownership and economic constraints.

In this regard, Redrow Homes, with the support of the Hardwicke Court Estate and Gloucestershire County Council are promoting the Land to the South of Hardwicke for residential development. The area equates to approximately 65ha and has an estimated capacity of 1200 dwellings together with a primary school, local centre and associated ancillary uses including open space, infrastructure and drainage attenuation.

The Land to the South of Hardwicke was included within the Issues and Options Consultation Document and recognised as a 'potential development site' as supported by a favourable Strategic Assessment of Land Availability in 2017. The site is the subject of detailed candidate site representations and supported by a constraints and opportunities plan as well as an illustrative masterplan to demonstrate how the site could be sustainably developed. Information in support of the allocation of the site are included at Appendix 1.

The Land to the South of Hardwicke represents an entirely appropriate location for new homes that could assist in meeting the housing needs of both Stroud District and Gloucester City, if required. The site represents a genuinely available source of new homes, without significant constraints. The site can deliver housing in the short term including within the first five years of the Plan period.

## **A Vision for the Future**

### Question 3.2a and 3.2b

It is considered that the Strategic Objectives relating to Homes and Communities do not go far enough in relation to the Top Key Issues and Key Issue 1 (Ensuring that new housing development is located in the right place, supported by the right services and infrastructure, to create sustainable development).

The following strategic objectives should also be included in line with the guidance contained in the NPPF (2018) to ensure the strategic vision can be fully delivered and realised:

- In line with paragraph 20 of the NPPF, strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision of housing. As such, the strategy should ensure that housing need within Stroud District is more than adequately addressed;
- In line with paragraph 23 of the NPPF, strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable

development. The plan should therefore also enable a housing supply to come forward early in the plan period and therefore ensure a 5-year housing land supply can be realised on the adoption of the plan.

- In line with paragraph 27 of the NPPF in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan-making process to provide transparency. As such, the 'Duty to Co-operate' between Stroud District and the JCS Authorities is required to be meaningful and fully collaborative in order to address strategic delivery issues and to ensure that any requirements to meet housing needs in Gloucester City can be fulfilled.

## **Emerging Growth Strategy**

### Question 4.2a and 4.2c

Support is provided to the Emerging Strategy's approach of distributing growth across the District to the main towns as well as to medium to larger sized settlements where additional growth could help support and improve existing services and facilities.

Given the role Land to the South of Hardwicke (ref G1) is likely to play in meeting both Stroud and/or Gloucester City's housing needs (as confirmed by page 35 of the Emerging Strategy), it is however considered that the settlement of Hardwicke should be identified and included as a further growth area within the Plan.

Hardwicke is very much aligned to Gloucester City with its extensive range of facilities and services. Hardwicke is also highly accessible and contains a basic range of facilities and services and is therefore capable of being a Second Tier settlement with additional facilities that future housing growth could provide. Such facilities could include additional retail, open space and educational uses.

The area also lies outside of the statutory Green Belt, Area of Outstanding Natural Beauty and Special Landscape Area.

As previously stated, Redrow Homes, with the support of the Hardwicke Court Estate and Gloucestershire County Council, are promoting the Land South of Hardwicke for residential development. In support of the promotion of the land, Redrow Homes has a full specialist team appointed who have undertaken a full suite of technical investigations and assessments across the site. As such, all constraints, opportunities and characteristics of the site are thoroughly understood, and an illustrative masterplan has been prepared to demonstrate how the site could be developed. This technical work could therefore be swiftly converted into a planning application to ensure the site is capable of making early contribution to the housing supply. The site is also free from complex land assembly negotiations and the requirement for third party land to secure access. A technical pack of information is attached at Appendix 1 which demonstrates the immediate deliverability of this land for housing based on an evaluation of its constraints and opportunities.

In terms of the Gloucester, Cheltenham and Tewkesbury JCS, the Land at Hardwicke was promoted in the event that land within the Stroud administrative area was required to meet the unmet housing needs from other authorities via the Duty to Co-Operate in the housing market area, and in particular, Gloucester.

In support of the sites suitability for residential development and to meet local housing needs, the JCS Inspector outlined at paragraph 79 of the May 2016 Inspectors Interim Report (Exam 232) that: *“on the evidence before me there appear to be no other appropriate sites to form additional, sustainable, urban extensions to Gloucester, which fall entirely within the JCS area. Nonetheless there seem to be two reasonable omission sites on the southern edge of Gloucester”*, one of which comprises the application site at Hardwicke.

The Inspector went on to recognise that the Hardwicke site is outside the Green Belt and, despite Gloucester City Councils desire to expand to the north, the land at Hardwicke accords with the JCS Spatial Strategy...*“In my judgement [Hardwicke] appears to be in sustainable location, being close to local centres, employment opportunities and school, and within reasonable distance of the City centre”* (paragraph 80 refers).

Whilst land outside the three authority boundaries was not included within the JCS, the JCS Authorities accepted in their Matter 9 Statement (relating to omission sites), that strategic levels of development at Hardwicke (in Stroud District) would accord with the Spatial Strategy of the JCS. The site was however not objectively assessed by the JCS Authorities, quite simply due to the fact that it was located outside the JCS boundary area.

The JCS Inspectors findings (at paragraph 99 of EXAM 232) concluded that *“overall, in my judgement, there are no insurmountable constraints to developing the Hardwicke site and it would make an appropriate allocation to help meet the housing requirements of Gloucester and the JCS area.”*

On the basis of the above, it is considered that the Land South of Hardwicke as promoted by Redrow Homes with the support of the Hardwicke Court Estate and Gloucestershire County Council, is a suitable area for future development to meet future housing needs.

In terms of other sites identified within the Emerging Strategy, we would raise the following concerns over the viability and deliverability of three sites in particular for the following reasons set out below:

#### Whaddon

- Complex land assembly is required to deliver site access via Waterwells, which will be time consuming, and renders the site unlikely to deliver units within the 5 year period.
- Furthermore an access via Waterwells would cross over the railway, this would be a costly upfront infrastructure cost for the scheme to bare.
- It is understood that the St Barnabas roundabout, to the north of site, is at capacity and requires a radical solution to create capacity to deliver the site if access is to come from the north. In light of these highway constraints the site is not immediately available for development.

- The site has an open landscape character – a significant amount of on-site features (such as hedgerows) appear to have been removed. These features usually assist with providing containment. The site's undulating topography can be seen from AONB.
- We question where a first phase can be delivered. It is unclear how the site would be built out. There is intervening land between the area controlled by the national housebuilder and the urban edge (to the north east of the site) and so the site does not relate well to the existing settlement or facilities and amenities.

#### Wisloe

- The identified area comprises multiple landownerships and so complex land assembly will be required, thus making the site highly likely to be undeliverable in the 5 year period.
- The proposal is to deliver a new 'garden village community' at this site. We would question whether a development on the Wisloe site would have the critical mass to support anything other than a very basic level of facilities (i.e. a local store, perhaps a take-away and a primary school) making travel out of the immediate environs of the development necessary for most day to day purposes. We therefore question the sustainability of the site as existing services are well over walking distances. The site would operate as an extension to Cam and should be promoted as such.
- Viability – has the site's viability been assessed? New settlements/garden villages often require significant abnormal costs for servicing therefore it would be helpful to understand whether the site can deliver policy compliant affordable housing etc.
- The site has not been submitted as a comprehensive candidate site. Confirmation is therefore required about whether the land in questions is available for development.
- Coalescence – as proposed, the scheme would arguably join Cam with Slimbridge and Gossington, and significantly erode the gap with Cambridge. It would be very difficult to understand how the subject site can be delivered without comprising the unique character of each surrounding settlement/hamlet.

#### Sharpness

- Viability – Sharpness is a low value market area, differing substantially from the Berkeley market, therefore we query whether the scheme can deliver a policy compliant level of affordable housing in addition to the necessary infrastructure.
- Brownfield extant Local Plan Allocation – the Council's aspiration to see the current allocation developed first is unlikely– this will delay the site's delivery.
- Floodplain – has the extent of the flood plain been fully explored in order to establish whether the unit numbers quoted can be delivered?
- Accessibility – a tram-trail link is being proposed to connect the strategic site to Cam station, Stagecoach have raised concerns regarding its deliverability. Without this is, strategic scale growth (over 500 dwellings) in this location appropriate or sustainable?

#### Question 4.2d

In terms of Stroud District assisting Gloucester City and the JCS Authorities in meeting their housing needs, it is vital that the Stroud District through the Local Plan Review engages in an effective, meaningful and fully collaborative joint working relationship with the JCS Authorities.

As previously identified, paragraph 27 of the NPPF (2018) makes it clear that: *“In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency”*.

During the last Local Plan and JCS Core Strategy making processes, there was little evidence that effective cross-boundary working relationships took place in respect of meeting housing supply issues; merely lip service was paid in regard to the Duty to Cooperate and the JCS Core Strategy was adopted without meeting all of its housing need requirements. A stronger commitment should therefore be made to ensure this cross-boundary working relationship can work as effectively as possible.

In respect of the sites identified to potentially address Gloucester’s housing needs, support is provided for the development of the Land to the South of Hardwicke to help assist Stroud District and/or Gloucester City and the JCS Authorities to meet their housing needs.

In addressing strategic housing delivery issues both within Stroud District and potentially Gloucester City, it however pertinent that Stroud District ensures that sites such as Hardwicke are not required to meet their own needs first. For the reasons given above, we are already concerned about the viability and deliverability of a number of the sites included as potential development locations in the Local Plan Review.

The full housing needs of the local authorities using the standard method for assessing local housing need needs to be clearly understood to ensure the most appropriate planning strategy for the delivery of housing. This will require the identification of land for residential development to the south of Gloucester to meet what we consider should be a substantial housing requirement arising from both the Stroud Local Plan Review and JCS Core Strategy Review process. Whilst we understand that an assessment of potential sites to meet Gloucester’s long-term housing needs will be carried out during 2019, this assessment is fundamental to Stroud’s Plan making process and therefore it is of vital importance that the timetable for the Stroud Local Plan Review should stay in sync/twin track with the JCS Core Strategy review to ensure that the adequate land can be allocated to address the issue of the housing shortfall in Gloucester City.

## **Our Towns and Villages**

### Question 4.4a and 4.4e

No - The settlement limits of Hardwicke should be extended to include the Land to the South of Hardwicke as promoted by Redrow Homes Ltd, as shown on the site location plan at Appendix 2. Extending the settlement limits of Hardwicke is required in order for the plan to fulfil its top key issue of providing housing in the right place.

## **Making Places**

### Question 5.0a, 5.0b, 5.0c and 5.0d



## Gloucester Fringe

Given the vital role that the Land to the South of Hardwicke is likely to have in delivering housing to meet Stroud District and/or Gloucester City's housing requirements, reference to the site should be made within the vision for the Gloucester Fringe area. To reflect this, it is suggested that the over-arching vision should also make reference to: *"promoting an inclusive community capable of providing significant community and infrastructure benefits to benefit both existing and future residents of Hardwicke"*.

### Question 5.1a

Support is provided to Site G1 – Land South of Hardwicke and its role to meet the needs of both Stroud District and/or the unmet needs at Gloucester.

Redrow Homes Ltd, with the support of the Hardwicke Court Estate and Gloucestershire County Council, are promoting the land at Hardwicke Court Estate for residential development.

The Land to the South of Hardwicke is the subject of detailed candidate site representations (attached to this submission) and supported by a constraints and opportunities plan as well as an illustrative masterplan to demonstrate how the site could be sustainably developed without any significant planning, physical or ownership constraints.

Significant investment has been made to progress to the stage where constraints are understood, mitigation where necessary can be installed and the scale of potential development is known. As such, the full suite of technical work can be swiftly converted into a planning application to ensure the site is capable of making early contribution to the housing supply.

It is therefore considered that the Land to the South of Hardwicke represents an entirely appropriate location for new homes and represents a genuinely available source of new homes, without significant constraints that can deliver housing in the short term including within the first five years of the Plan period.

In particular:

- The promotion of the site is being led by Redrow Homes with the support of both Hardwicke Court Estate and Gloucestershire County Council. Redrow Homes also hold a freehold interest in part of the site.
- Free from planning and physical constraints, is economically viable and immediately available.
- The site can be accessed without third party land/complex land assembly.
- The land is not within the statutory Green Belt, not within the designated Special Landscape Area and does not associate with the Area of Outstanding Natural Beauty.
- Close to key employment, service, facilities with good vehicular and public transport connectivity to Gloucester City Centre. A primary school is immediately adjacent to the site;
- Other local service centres are within reach (including Quedgeley and Hunts Grove)
- Good road links to Gloucester City Centre and southwards (A38, B4008 and M5);

- Good 'containment': A38/Hardwicke village (Pound Lane/Church Lane/Green Lane)/the Gloucester-Sharpness Canal and the existing Hardwicke development do all provide quite clear limits, beyond which growth and expansion would be illogical.
- Site has the potential to enrich and supplement services and facilities, to serve what would be a larger and potentially more self-sustaining community at Hardwicke.
- More visually remote from AONB and other sensitive landscape features (than sites in alternative areas (e.g Brookthorpe/Whaddon and Upton St Leonards)).





# APPENDIX 1: CANDIDATE SITE INFORMATION

# LAND SOUTH OF HARDWICKE CANDIDATE SITE

JANUARY 2019





“We focus on delivering high quality homes and creating community and physical environments that help promote people’s sense of wellbeing”

Redrow Homes







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## THE OPPORTUNITY

Land to the South of Hardwicke, in Stroud District immediately adjoins the urban edge of Gloucester and represents a key opportunity to assist Stroud District, Gloucester City Council and the other JCS Authorities in the delivery of future housing.

The site lies outside of the statutory Green Belt, Area of Outstanding Natural Beauty, Special Landscape Area and is located close to local centres, employment opportunities, schools, healthcare and the range of facilities and services offered by Gloucester City centre.

The site area equates to approximately 65ha (160.5 acres) and has an estimated minimum capacity of 1200 dwellings together with a primary school, local centre and associated ancillary uses including open space, infrastructure and drainage attenuation.

The site is readily available to make an early contribution to the housing need for Stroud District, Gloucester City and the other JCS Authorities as a whole.

The site had the following positive commentaries from the JCS (Core Strategy) Inspector:

- In support of the site's suitability for residential development and to meet local housing needs, the JCS Inspector outlined at paragraph 79 of the May 2016 Inspectors Interim Report (Exam 232) that: "on the evidence before me there appear to be no other appropriate sites to form additional, sustainable, urban extensions to Gloucester, which fall entirely within the JCS area. Nonetheless there seem to be two reasonable omission sites on the southern edge of Gloucester", one of which comprises the development site at Hardwicke.
- The Inspector went on to state..."In my judgement [Hardwicke] appears to be in sustainable location, being close to local centres, employment opportunities and school, and within reasonable distance of the City centre" (paragraph 80 refers).
- In conclusion, the JCS Inspectors findings at paragraph 99 outlined that "overall, in my judgement, there are no insurmountable constraints to developing the Hardwicke site and it would make an appropriate allocation to help meet the housing requirements of Gloucester and the JCS area."





## OWNERSHIP AND SITE DESCRIPTION

Redrow Homes Ltd, with the support of the Hardwicke Court Estate and Gloucestershire County Council, are promoting the Land to the South of Hardwicke for residential development. Redrow Homes is leading the promotion of the site and also owns the freehold of part of the site.

The site is located adjacent to the suburb of Quedgeley at the southern edge of the Gloucester conurbation; adjacent to the 'A38' Bristol Road. The candidate site divides into three separate areas, the majority of which is currently agricultural. Access to the site is currently achieved via Green Lane, Sticky Lane, Pound Lane and Church Lane.

The site's western boundary is formed by the Gloucester and Sharpness Canal, which provides both a physical and visual barrier to the west. The eastern boundary is formed by the B4008, A38 and the large buildings of the Quedgeley Trading Estate West. To the south lies the open countryside.

Development at Hardwicke would provide further opportunity to consolidate and enhance the development in the area including the ongoing development at Hunts Grove on the eastern side of the A38. The site itself would deliver a range of services and facilities to deliver a sustainable community.

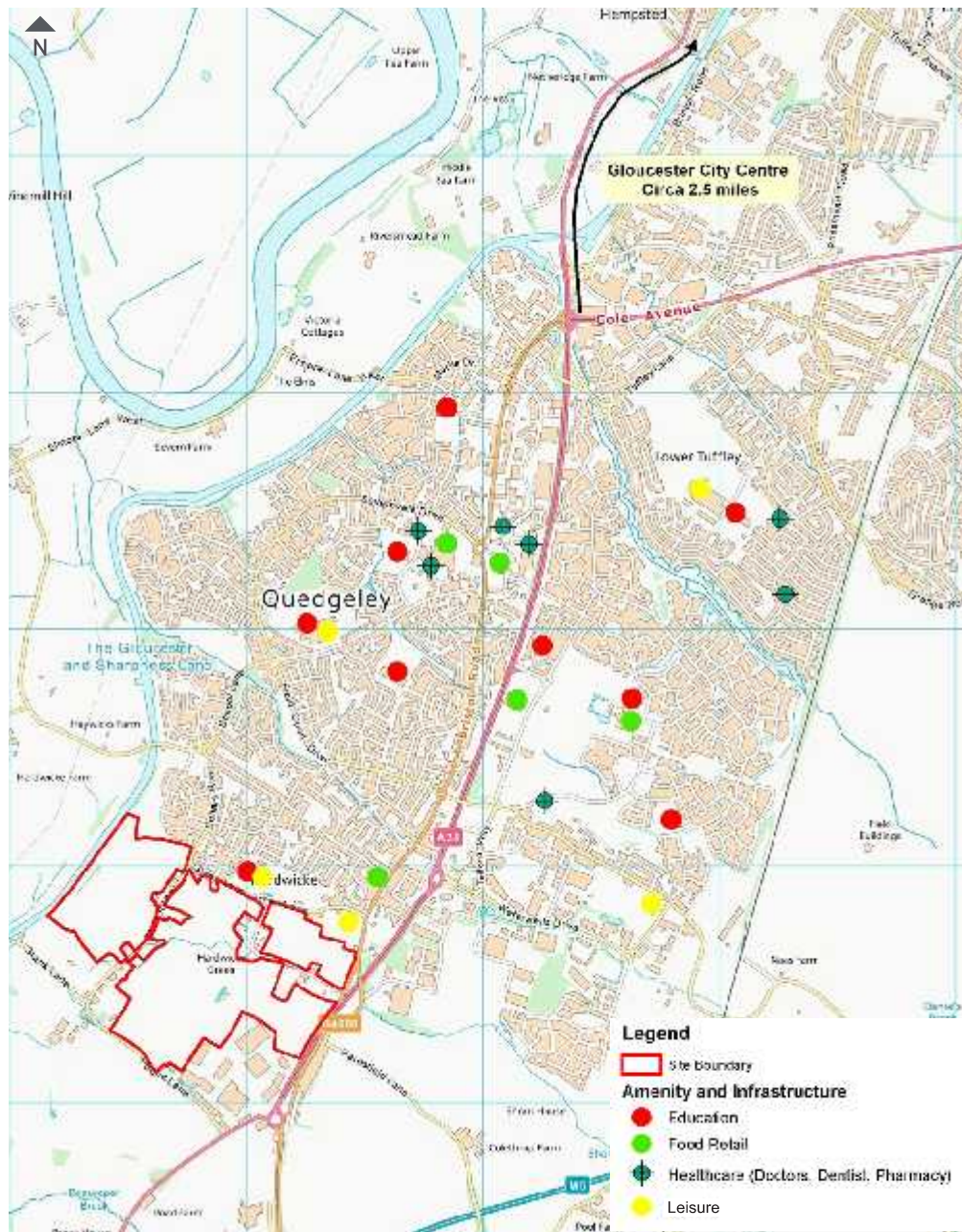
Outline planning permission for the development of 175 dwellings on the north-eastern corner of the site, known as 'Land to the West of Bristol Road' was submitted in January 2017. The application (ref: S.16/2793/OUT) is under consideration with Stroud District Council's Planning Department. At the current time we consider that all technical matters have been satisfactorily addressed.



# SITE SUITABILITY

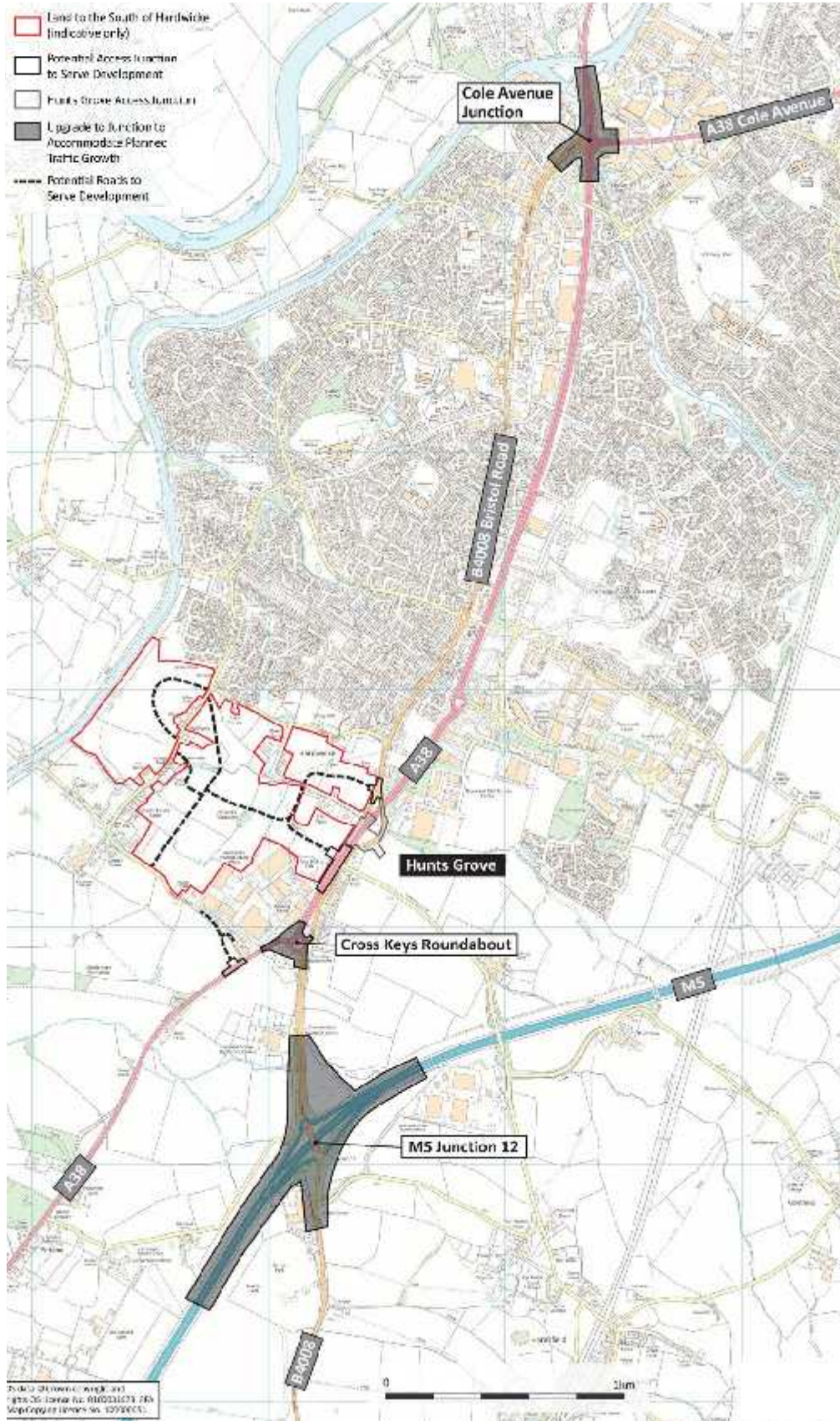
## ACCESSIBILITY

Land to the South of Hardwicke is located where a sustainable pattern of development can be achieved by way of access to local facilities including education, leisure, health, retail and employment on foot, by bicycle or by bus. The internal site layout and site access arrangements would be designed in a manner which facilitates walking and cycling, and a bus strategy to serve the site would be devised in consultation with Gloucestershire County Council and local bus operator. Existing public rights of way may need to be diverted but desire lines would be accommodated as part of the proposals and these public rights of way together with new pedestrian and cycle links to both existing and proposed routes would provide good access for these sustainable modes of transport.



## LOCAL FACILITIES AND AMENITIES PLAN





**KEY JUNCTIONS AND HIGHWAY LINKS PLAN**

In respect of the 'Phase 1' development proposals, a detailed Transport Assessment has been undertaken to establish the Transport infrastructure needs and suitable access arrangements to serve a development of 175 dwellings; the subject of planning application S.16/2793/OUT. The proposed site access arrangements to serve 'Phase 1' comprise a roundabout on the B4008 Bristol Road positioned at the 'top' of the A38 Northbound Off-Slip. This slip road is part of a form of grade separated junction that provides connections between the B4008 and the A38. The proposed roundabout would act as an effective speed control feature and would be compatible with the consented signalised junction onto the A38/B4008 to serve the Hunts Grove development (the Hunts Grove access), which includes the conversion of the existing overbridge to two-way traffic.

It is proposed that the primary access to development on Land to the South of Hardwicke would be from the A38 by way of a new signal controlled junction that would operate in conjunction with the Hunts Grove access and would be compatible with the County Council's Cross Keys roundabout improvement scheme.

In addition to the proposed accesses from the B4008 Bristol Road and the A38, it is possible other accesses to roads surrounding the site could be formed, which, in combination with a network of new roads crossing the site would relieve sections of Green Lane, Church Lane and Pound Lane by way of improved connectivity providing alternative routes for local traffic to gain access to the wider highway network. The key junctions and highway links together with a potential network of roads to serve development on the site are shown on the accompanying plan.

## LANDSCAPE AND VISUAL

Hardwicke is visually well contained located adjacent to the developments of Hunts Grove and Sellars Farm, both of which have been found to constitute appropriate urban extensions to Gloucester. There is no reason to believe that the same should not be true for Hardwicke. Furthermore, Hardwicke does not extend any further south than Quedgeley Business Park and therefore does not represent urban sprawl in this regard.

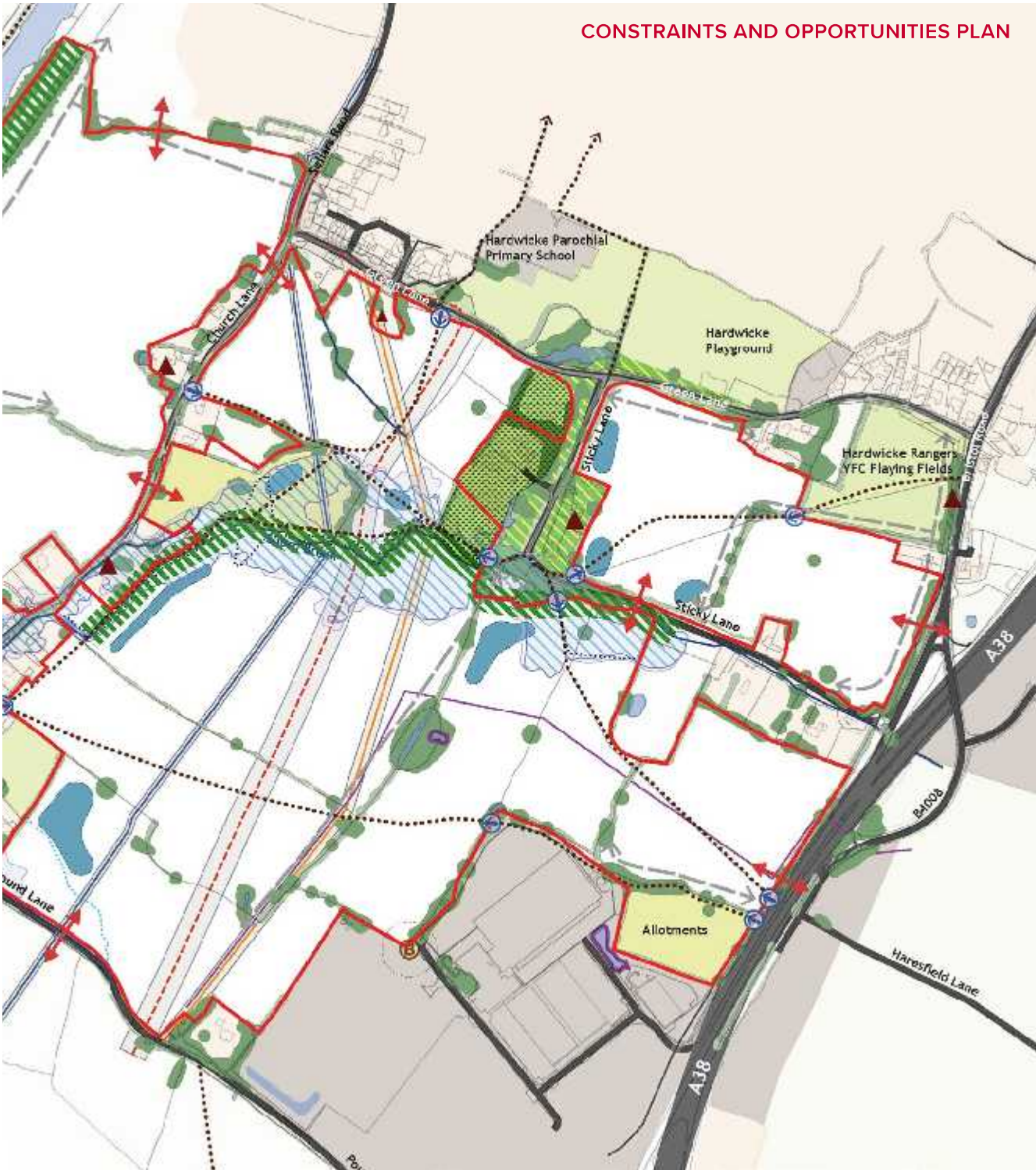
A Landscape and Visual Appraisal has been undertaken and it has been established that from a landscape perspective, it will be possible to introduce development onto the site without any adverse character effects taking place within the wider area. This is predominantly due to existing vegetation and the fact that the development character will mimic that of the surrounding area.







## CONSTRAINTS AND OPPORTUNITIES PLAN



With regard to the visual appraisal, due to the topography of the site, existing built form and vegetation, views of the site are contained to the site itself and the immediate vicinity. The development, from a distanced perspective, will integrate into the wider built panorama and constitute a small extension to the current urban form.

The principles contained within the illustrative masterplan are considered to be appropriate in terms of its setting and the landscape character of the site. The masterplan has green corridors and large area of green space at the interface with the land to the South and West.

## HERITAGE

The work undertaken to date confirms that the site contains no designated or non-designated built heritage assets. The site is however abutted to the west by a Grade II listed former farmhouse which is situated on Hardwicke Green. To the north of the site there is also a Grade II listed milestone and the road that abuts the eastern end of the site is recorded on the Gloucestershire Historic Environment Record. To the west of Hardwicke Green there is an 18th century farmhouse that is also noted on the Historic Environment Record. The location of listed buildings is shown on the Constraints and Opportunities Plan.

The designated and non-designated heritage assets will be unaffected by the development. Listed buildings that lie further afield would also be unaffected due to distance from the proposed site and screening.

## ARCHAEOLOGY

A desk-based archaeological assessment has been undertaken, there are no designated or non-designated archaeological assets recorded on the site. Additionally, geophysical investigations and trial trenching has also taken place within the north-eastern area of the site for the land the subject of the outline planning application for Phase 1. Based on the findings of the investigative surveys, the LPA advisor confirmed that no further fieldwork was required in this specific area.

While it is not possible to extrapolate this potential across the whole of the wider site, the results in the Phase 1 area indicate that there may be a limited archaeological potential across the rest of the wider site. It is therefore concluded that there is no indication of any absolute constraint to development arising from the presence of archaeological remains within the wider site.


## ECOLOGY

A Phase 1 Habitat Survey of the candidate site was undertaken in August 2018. In spring/summer 2018 protected species surveys were undertaken for bats, water vole (along Shorn Brook), great crested newts and breeding birds.

The reports confirm that the site largely comprises intensively farmed arable fields which are of low ecological value. Ecological features of interest in the context of the site, such as boundary hedgerows, grassy field margins and Shorn Brook, are almost entirely retained within the illustrative masterplan. The small number of mature and semi-mature trees will also be retained. The existing vegetation is not species-rich, but the retention of tree/hedgerow corridors is necessary in order to allow for bats to travel freely and unhindered by the development. There are limited opportunities on the site for badgers, hedgehogs and other small mammals to be accommodated.







The species surveys have confirmed that water vole are resident in Shorn Brook, great crested newts (GCN) breed in one of the on-site ponds and in a second pond within 250m of the boundary, as such the development of the site will be covered by a GCN European Protected Species Mitigation Licence.

Taking into account the overall low ecological value of the site and with the incorporation of appropriate species protection measures and the proposed habitat creation and enhancement, it is considered that the principles included within the illustrative masterplan will successfully deliver no biodiversity net loss and will result in no significant, adverse effects on existing, ecological features of the site.

### **FLOOD RISK AND DRAINAGE**

A Desk Top Assessment of the flood risk in the area based on Environment Agency and Strategic Flood Risk Assessment data has been undertaken. The majority of the site is located within Flood Zone 1. Areas of the site associated with Shorn Brook, which runs through the middle of the site from Church Lane, and an un-named water course at Pound Lane are located within Flood Zones 2, 3a and 3b. The submitted constraints and opportunities plan illustrates the extent of the flood zones.

The flood risk from all sources to the site and the surrounding area has been investigated and it has been demonstrated that areas within and adjacent to the site that are within flood zone 2, 3a and 3b are not at risk of flooding. The illustrative masterplan directs built development away from these areas. The plan also assumes that attenuation basins will be located at the lowest points of the site. The exact size and location of the basins will be subject to detailed analysis later however, it is considered that surface water flooding risk as a result of the proposed development can be adequately managed on site within attenuation ponds.

The drainage review undertaken to date demonstrates that the development accords with National and Regional Policy requirements and satisfies Environment Agency criteria. The site can therefore be safely developed without flood risk and without increasing flood risk elsewhere.

### **CONTAMINATION/POLLUTION/LAND STABILITY**

The site is greenfield and has only been used for agricultural purposes. The site is therefore considered to be of little or no risk of contamination to future land uses. There are no known land stability issues.

### **PIPES, SEWERS AND OVERHEAD LINES**

The routes of all known pipes, sewers and overhead lines, as identified on the constraints and opportunities plan, are respected in the masterplan design for the site.

“overall, in my judgement, there are no insurmountable constraints to developing the Hardwicke site and it would make an appropriate allocation to help meet the housing requirements of Gloucester and the JCS area.”

*JCS Inspectors findings (paragraph 99)*

## DESIGN AND AMENITY

The submitted constraints and opportunities plan for the site (ref: COP\_01 Rev E) has been submitted to demonstrate the consultant teams clear understanding of the site. The constraints plan also accommodates Severn Trent Water's recent sewerage upgrade which has utilised the land at Hardwicke in collaboration with the development proposals.

The illustrative masterplan (ref: ILP01 Rev B) then demonstrates the arrangements of land uses and demonstrates how the land at Hardwicke Court Estate could be developed in a sustainable manner and as a positive response to the site constraints and opportunities.

The illustrative masterplan has been submitted to the JCS Joint Core Strategy Review for information only. This masterplan is a working draft and as such is open for discussion.

Notwithstanding its early stage, the illustrative Masterplan has been informed by a detailed level of assessment information in relation to a number of factors regarding the constraints, opportunities and characteristics of the site.

Having regard to this information, the illustrative masterplan demonstrates how the site could provide for approximately 1200 dwellings at an average density of between 35 to 40 dwellings per hectare. This density range is considered appropriate and in keeping with the rural feel of neighbouring developments. The illustrative masterplan also incorporates the proposed development of Phase 1: 'Land West of Bristol Road' (planning ref: S.16/2793/OUT) which remains under consideration with Stroud District Council's Planning Department.

The main principles that have informed the development relate to the retention of existing landscape features, flood zones, the establishment of green links, movement desire lines and built heritage assets. In particular, development has been directed away from the flood zones and the existing hedgerows and trees are retained where possible. In turn, this has formed the basis of the structure of the scheme and open space provision. A green corridor has also been formed by the location of the high-powered gas main as well as the stream corridor and the location of great crested newts and bat corridors. Transportation routes have also been designed to try and relive pressure on the existing lanes within the site and aid permeability.

The illustrative masterplan demonstrates how the site could be sustainably developed to promote an inclusive community which would support a critical mass capable of providing significant community and infrastructure benefits including for example a primary school, local centre, public open space, sports pitches and transport links. Such facilities would benefit both existing and future residents of Hardwicke.







**ILLUSTRATIVE MASTERPLAN**



## DELIVERABILITY AND VIABILITY

Redrow hold a freehold interest in part of the site and confirm that it is immediately available should a site allocation/planning permission be forthcoming.

From a start of 50 homes being completed in the first year the whole site could be completed in 10 years on the basis of delivering circa 100 homes each year.

Redrow has a full specialist team appointed in the respect of the site. This team, the majority of which has been in place for over 3 years, is actively working up the proposals for the land with a full package of technical works and surveys. These include:


- Phase 1 Ecology Report
- Protected Species Surveys and Reports including in respect of Great Crested Newts and Bats
- Drainage Strategy
- Services and Utilities
- Landscape and Visual Assessment
- Arboriculture Assessment
- Heritage Assessment
- Archaeological Assessments
- Highways and Transportation

The above suite of detailed technical investigations and assessments can be quickly converted into a planning application to support future development of the site.



## CONCLUSION

- The promotion of the site is being led by Redrow Homes with the support of both Hardwicke Court Estate and Gloucestershire County Council. The site can also be accessed without third party land/complex land assembly;
- The site is free from planning and physical constraints and is economically viable.
- The land is not within the statutory Green Belt, not within the designated Special Landscape Area and does not associate with the Area of Outstanding Natural Beauty.
- Close to key employment, service, facilities with good vehicular and public transport connectivity to Gloucester City Centre. A primary school is immediately adjacent to the site;
- Other local service centres are within reach (including Quedgeley and Hunts Grove)
- Good road links to Gloucester City Centre and southwards (A38, B4008 and M5);
- Good 'containment': A38/Hardwicke village (Pound Lane/Church Lane/Green Lane)/ the Gloucester-Sharpness Canal and the existing Hardwicke development do all provide quite clear limits, beyond which growth and expansion would be illogical.
- Site has the potential to enrich and supplement services and facilities, to serve what would be a larger and potentially more self-sustaining community at Hardwicke Estate.
- More visually remote from AONB and other sensitive landscape features (than sites in alternative areas (e.g Brookthorpe/Whaddon and Upton St Leonards).

A photograph of a modern brick house with white window frames and a large tree in the foreground. The house is a two-story structure with a mix of red and white bricks. It has several windows, including a large bay window on the left and a smaller one on the right. A large, leafy tree stands in the foreground, partially obscuring the house. The house is set on a green lawn with a paved driveway. The sky is clear and blue.

This candidate site represents a key opportunity to assist Stroud District, Gloucester City Council and the other JCS Authorities in the delivery of future housing





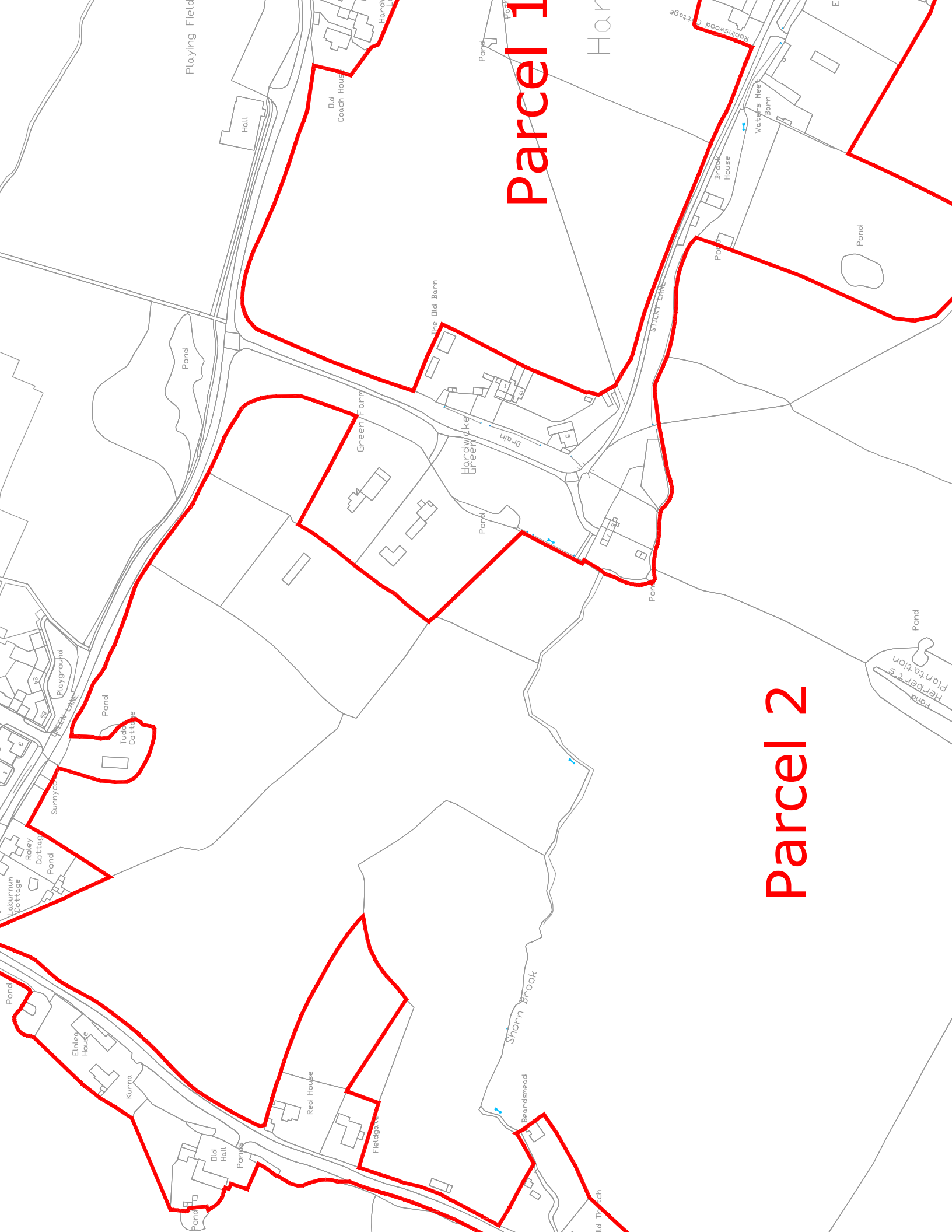
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## APPENDIX 2: SITE LOCATION PLAN



Parcel 1

Parcel 2