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Stroud District Local Plan Review Emerging Strategy Paper

Representations on behalf of Colethrop Farms Limited

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1 Introduction

1.1 Background

- 1.1.1 Peter Brett Associates LLP (PBA), now part of Stantec, is instructed by Colethrop Farms to submit representations to Stroud District Council (SDC) on the Emerging Strategy Paper that has been prepared for the Stroud Local Plan Review and published for consultation until 18 January 2019.
- 1.1.2 The purpose of the Emerging Strategy consultation is to establish whether SDC have identified the main issues and needs in the District up until 2031.
- 1.1.3 These representations are made in relation to land owned by Colethrop Farms at Hunts Grove, Quedgeley East and Haresfield. The representations cover the relevant sections of the consultation document.
- 1.1.4 By way of Background:
- Land at Hunts Grove is already allocated for housing in the adopted Stroud Local Plan and is in the process of being delivered by Crest Developments and others. It should remain an allocation in the emerging Local Plan to guide planning applications.
 - Land at Quedgeley East Business Park forms an extension to the recently granted St Modwen planning permission and is proposed to be allocated in the emerging Local Plan. Colethrop Farms supports this proposal but suggest it may be beneficial to consider a mixture of uses on the site.
 - Land at Haresfield has been identified to Stroud District Council as a small housing site within the village. Sites such as this can be beneficial in helping to ensure Haresfield remains a balanced and sustainable community and is of a scale that could deliver community benefits. Colethrop Farms Ltd suggest it is better to consider the allocation of a small parcel of land which will deliver benefits rather than rely upon windfall development in this settlement.
- 1.1.5 In response to the consultation document, Colethrop Farms Ltd's comments can be summarised at this stage as:
- Support for a flexible plan that provides enough land to meet a likely increase in housing need (derived from expected changes to the Standard Methodology).
 - Support for both housing and commercial growth within the M5/A38 Central Severn Vale commercial corridor, especially around Quedgeley which a focus for commercial growth is already.
 - Support for a vision that establishes what Stroud District should achieve at the end of the plan period, rather than one which assesses the current circumstances.
 - Support for a range of sites, sizes and location to ensure the plan has flexibility to respond to changing circumstances. Colethrop Farms does not support an unsustainable quantum of growth in locations such as Sharpness which would be undeliverable during the plan period. Similarly, a dispersal approach outside of the highly sustainable A38/M5 corridor is not supported.
 - Support for a clear and measurable set of objectives that ensure that there are sufficient opportunities to deliver enough housing and employment to meet at the very least, the minimum need with an appropriate degree of additional capacity for flexibility purposes.

- 1.1.6 By way of conclusion, there has been much change in the Quedgeley/ Haresfield area in recent years, including the construction of several major development projects. This has changed the landscape around J12 and supports the notion of support for further growth in this area.

2 Key Issues

1.0a Have we identified the top 5 issues for you?

- 2.1.1 Colethrop Farms note the relevance of a plan-led system as a means of delivering housing, employment and infrastructure to meet local needs. At the same time, it is necessary to be responsive from an environmental and social perspective to build sustainable and successful communities. These representations are written within this context and are focused on finding ways to achieve this outcome.

Key Issue 1

- 2.1.2 Colethrop Farms support the key issues, key issue 1 which relates to new housing development, but it is important to recognise that greenfield sites can be sustainable. In the context of the existing allocations at Hunts Grove, this provides good access to existing services and infrastructure and sustainable development can be achieved here, as identified (and allocated) is in the existing adopted Stroud Local Plan. The Hunts Grove adopted allocations will be delivered and should remain as allocated sites within the revised Local Plan.
- 2.1.3 Being in the right place is as much about being deliverable as it is being supported by services and infrastructure. There is a need for a mixture of sites, including brownfield and greenfield and the two should be enabled alongside each other. Prioritising brownfield land cannot be at the expense of failing to deliver sustainable development – providing housing, affordable housing and new infrastructure in the right locations. Small greenfield sites such as land at Haresfield would support such an approach.
- 2.1.4 Colethrop Farms support the notion that development has an important role to play in supporting new infrastructure delivery, but that care needs to be taken in choosing those sites that achieve this in a reasonable and viable manner.

Key Issue 2

- 2.1.5 Colethrop Farms support the importance of Green Infrastructure but question the basis for expanding the AONB. It was chosen for its specific qualities that are not always displayed everywhere. Expanding the AONB could risk de-valuing its status. An extension of the AONB is not supported or justified.

Key Issue 3

- 2.1.6 Colethrop Farms support initiatives to reuse brownfield land and underused sites but note this is not a new objective and one which does generate some dwellings, but not many in Stroud when compared with larger urban authorities. In the context of a significant housing requirement there will be a need to support the early delivery of some greenfield sites.

Key Issue 4

- 2.1.7 Colethrop Farms note strategies which seek to conserve open spaces which serve a local community's need and protect and mitigate impacts on the natural environment. However, by choosing to develop the right greenfield land the LPA can use development to improve biodiversity.

Key Issue 5

- 2.1.8 Greenfield development is usually financially best placed to deliver affordable housing. Colethrop Farms support the delivery of affordable housing in a viable manner

General

- 2.1.9 Design quality is missing as an issue and should be included.

1.0b Do you agree with the ways we intend to tackle them?

- 2.1.10 Colethrop Farms support issue 1 relating to the location of new housing, creating new sustainable communities and concentrating employment growth in tandem with housing along the A38/M5 corridor.
- 2.1.11 Retaining existing housing and employment allocations at Hunts Grove and Quedgeley East will contribute to the delivery of sustainable development – providing both homes, jobs and services in a sustainable location. There is a commitment to deliver the existing allocations and as such, the plan should support their provision.
- 2.1.12 The NPPF addresses (at paragraph 72) that the supply of new homes can often be best achieved through planning for large scale developments which includes new settlements and goes on to say; *‘Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.’ (NPPF July 2018, para 72).*

3 Issue Topics

2.1a Do you agree with the ways in which the emerging Strategy intends to support the Local economy and the creation of jobs?

- 3.1.1 Colethrop Farms Limited support the M5/A38 corridor as the most sustainable locational choice for growth and furthermore agree with the aim of the strategy to develop new employment together with new housing to create sustainable communities. Development at Hunts Grove and Quedgeley East provide the opportunity to deliver the aims of the emerging strategy in respect of the local economy and the creation of jobs. Land at Haresfield would support sustainable growth at a local level within this corridor.
- 3.1.2 Housing and job growth is linked. Housing is needed to ensure a sufficient labour force to attract new business and new business is needed to support the purchase of housing. The key to both is having the right sites in the right location that are attractive to growth.
- 3.1.3 The extension to Quedgeley East has planning permission. St Mowden are in the process of delivering these proposals to meet employment needs of the current Local Plan.
- 3.1.4 Colethrop Farms Limited support employment growth in this location and especially a further extension to Quedgeley East Business Park (beyond that which has planning permission). At this stage it is suggested that further growth may take the form of a mixed use proposal as this would create a more balanced development on the south side of the M5, which would respect Haresfield and the surrounding area.
- 3.1.5 Not everyone will live and work in the same settlement/location, so access to a range of travel modes is important to support the economy. Hunts Grove, Quedgeley East and Haresfield are all well placed within the A38/M5 corridor.
- 3.1.6 Homebuilding makes a major contribution to the economy and in this case, over the lifetime of a plan, development at Hunts Grove would be a significant employer contributing significantly to the local GVA.
- 3.1.7 We support a clear economic strategy and larger-scale sites like Hunts Grove should continue to form part of that strategy.

2.2a Do you agree with the ways in which the emerging Strategy intends to support the District's Town centres?

- 3.1.8 We support the approach to supporting town centres.

2.3a Do you agree with the ways in which the emerging Strategy intends to meet local housing need?

- 3.1.9 Flexibility and the robustness of the deliverability of sites is important in the context of immediate land supply and 5-year rolling land supply. There is a clear emphasis in the NPPF to deliver efficient housing development where there are sustainable reasons to do so. Throughout the NPPF, there is a consistent theme of flexibility in plan making terms to adjust to changes in market conditions.
- 3.1.10 Stroud has managed to avoid land supply issues in recent times unlike neighbouring authorities; we believe part of this has been a result of allocating enough deliverable land. However, the LPA should note the much more stringent approach being taken by MHCLG as to what constitutes a deliverable site, and this makes it significantly more important to make sure the plan is flexible and robust with regard to delivery. Part of this includes having a range

of sites and sizes in different locations to make the most of the housing market's ability to deliver.

- 3.1.11 Places like Hunts Grove is not constrained and is deliverable from the outset of the plan period to ensure that by the end of the period it has provided what is set out to achieve.
- 3.1.12 It is also recognised that this process should be supported by both brownfield and smaller greenfield sites such as land at Haresfield to ensure there are no delivery gaps in the housing trajectory.
- 3.1.13 Providing for housing in sustainable locations and identifying land where it is most needed, to address the needs of groups with specific housing requirements is set out in paragraph 59 of the NPPF and re-iterates the approach that the plan should take.
- 3.1.14 Under the Standard Housing Methodology, Government requires the Local Plan Review to provide for at least 603 new homes per year (based on the latest 2016 household projections), or at least 638 new homes per year (based on the previous 2014 household projections). Either way, this requires a 32% to 40% increase on the figure in the current Local Plan of 456 homes per year. The preparation of a Local Housing Needs Assessment which will produce a minimum number of houses expected to be planned for is welcomed.
- 3.1.15 It is understood that before this plan is adopted, the Government intends to produce further guidance on the Standard Housing Methodology and how this may achieve the delivery of 300,000 dwellings per annum (nationally). At present the methodology achieves around 266,000, so retaining some flexibility to meet a modest increase in Stroud District would be prudent at this stage.
- 3.1.16 To meet this new challenging target every year, over a 20-year period, will require the Local Plan Review to identify land for at least 12,800 new homes. Currently, 7,100 new homes have received permission or are already identified in the current Local Plan and so the Council is required to identify land for at least 5,700 homes to meet this requirement. Maintaining the allocation at Hunts Grove supports the delivery of at least 750 dwellings.
- 3.1.17 The latest affordability ratio between income and house prices in Stroud District is 8.8:1 – one of the highest levels in the South West which is a major factor in driving the future housing requirement in the District using the new standard methodology. As indicated above, the Standard Housing Methodology currently has an affordability cap; any subsequent removal of this would focus a greater proportion of housing at Stroud and this needs to be borne in mind especially as the Methodology represents a minimum requirement. We recognise the importance of affordable housing delivery and support a strategy that focuses some development at larger strategic sites to support a shift towards addressing the broken housing market.
- 3.1.18 The Hunts Grove allocation is large strategic site and consequently there are opportunities to deliver a greater variety of housing solutions and tenures.
- 3.1.19 There is, however, a need for a proportion of allocated sites to be smaller (as per the NPPF), these, along with any windfall allowance will deliver a significant number of self or custom build dwellings. The decision to deliver further custom or self-build dwellings on larger sites should be a choice for the developer to support timely delivery of housing on these particular sites.
- 3.1.20 We support a mix of dwellings, but emerging policy should recognise over the lifetime of the plan, the housing market will alter and a prescribed mix in one part of the District may not match need in another part. Emerging policy should be mindful of this and the need to allow the latest housing evidence to determine mix at the time applications are made rather than just when a plan is adopted. The emerging plan should also recognise the importance of viability to the delivery process.

3.1.21 The comment on a local housing occupier clause is noted and this requires more clarity. There is no specific market issue with holiday homes in Stroud and it is important to give the housing market (as part of the local economy) enough room to engage with purchasers. It would be perverse to prevent for example a doctor from being able to move to Stroud because they are relocated from elsewhere in the country. We don't believe that is the intention of the approach, but clarification is needed.

2.4a Do you agree with the ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?

3.1.22 The Green Infrastructure, Sport and Recreation Study commissioned by the Council and the proposed set of standards for local open space and sport and recreation facility provision is supported.

3.1.23 There appears to be a potential drafting error in the current local plan (Policy ES15). It is suggested that future policy wording relates to the Fields in Trust Six Acre Standard and the definitions it sets out should be used in any new policy wording. This is to avoid what may be a double counting in the current Policy ES15.

2.4b Do you support an alternative approach, or have we missed anything?

3.1.24 We do not support an alternative strategy but do think the current strategy should recognise the importance of strategic growth locations to local economic output and support for business growth.

3.1a Do you agree with the vision for 2040 as drafted?

3.1.25 The over-arching vision sets out a clear aspiration for the future of Stroud District. It sets out the distinct areas of Wootton-under-Edge in the south, Stroud Town in the centre and Upton St. Leonards in the north.

3.1.26 The vision is currently more of a statement of what is important now, rather than a vision for the future. It needs to be clear of what the plan should result in for Stroud at the end of the period.

3.1.27 The Vision should reflect different needs of towns and villages which are not always the same.

3.2a Do you agree with the strategic objectives as drafted?

3.1.28 The strategic objectives positively align with the ambitions for new development at Hunts Grove. In particular, the Hunts Grove location has good access to services and is able to deliver affordable housing to meet local needs.

3.1.29 The objectives are, however, very generic and could better relate to specific settlements within the local authority area, which follows through from the vision. This should include objectives relating to the geographical areas of Wootton-under-Edge in the south, Stroud Town in the centre, Upton St. Leonards in the north and the A38/M5 corridor to the west.

4.2a Do you support the broad approach of the emerging growth strategy in terms of distributing the growth required by national policy for Stroud District?

3.1.30 Colethrop Farms Limited support development at Hunts Grove, as envisaged through the Local Plan.

- 3.1.31 Hunts Grove was already identified for development and allocated for housing and employment in the previous Local Plan.
- 3.1.32 Retaining existing the housing and employment allocation at Hunts Grove will support the delivery of sustainable development – providing both homes, jobs and services in a sustainable location. There is a commitment to deliver the existing allocations at Hunts Grove from both Stroud District Council and we are working towards its delivery.
- 3.1.33 The extension to Quedgeley East has planning permission. St Mowden are progressing the delivery of this site to meet employment needs of the current Local Plan. Colethrop Farms Limited support further employment in this location, however the question is whether it is better as a mixed-use site. This could create a more balanced development on the south side of the M5, which would also respect Haresfield.
- 3.1.34 Option 3 will not bring about infrastructure delivery because a dispersal strategy will reduce the ability to delivery new infrastructure in the A38/ M5 economic corridor.
- 3.1.35 The Stroud Valleys are constrained in terms of development opportunities. Significant dispersal into the Stroud Valleys is not supported.
- 3.1.36 The main focus for development should be at Stroud Town and along the A38/M5 corridor. Development at Hunts Grove provides a sustainable development solution for the district.
- 3.1.37 There also needs to be a balance with some growth in smaller settlements which have a good level of community facilities.

4.2c Have we identified the right towns and villages for growth? Or do other settlements have growth potential?

- 3.1.38 Colethrop Farms is unable to comment fully on the approach to the selection of towns and villages for growth because at the moment, the LPA has yet to publish its settlement hierarchy evidence base. Once this is published, Colethrop Farms Ltd would like to provide further comment, specifically in respect of Haresfield.
- 3.1.39 It is hoped that the study is a dynamic one which does not simply explore existing facilities as a means of grading settlements, but rather looks at opportunities to improve sustainability for existing residents and create communities that are able to sustain services and facilities over the plan period and beyond.
- 3.1.40 Colethrop Farms Ltd believe that there are sound sustainability reasons to support a small amount of growth at Haresfield in a location which has seen significant economic growth.

4.2d Do you support our approach to addressing Gloucester's housing needs?

- 3.1.41 Colethrop Farms Ltd support the collaborative approach to housing delivery demonstrated in the Emerging Strategy. The approach is:
 - a) in accordance with the duty to cooperate established in paragraphs 24 to 27 of the NPPF, addressing the shortfall of housing delivery in Gloucester and reacting to the individual constraints of the neighbouring JCS plan area;
 - b) continues the existing shared responsibility and partnership for housing delivery in Gloucestershire as outlined in the existing Memorandum of Understanding and Statement of Cooperation signed by Stroud District; and
 - c) provides the opportunity to promote sustainable place making in accordance to the plan making objectives outlined in paragraph 16 of the NPPF.

3.1.42 Gloucester City will have the largest level of housing need within Gloucestershire in the next round of Local Plans. The existing evidence base for the JCS (Neil McDonald, 2018), demonstrates that Gloucester’s housing growth accounts for around 20% of Gloucestershire’s overall growth across six districts. However, Gloucester City is unable to make any strategic land contributions towards the delivery of its own housing need (see para 34 of the JCS examiners report, 2017) and has routinely failed to meet its annual minimum requirement for housing with an existing shortfall of 1577 homes since 2011 (see table 1).

Housing Delivery over the Plan Period 2011-2031 (Gloucester City Council Monitoring Report 2017/2018)

Monitoring Year	Net Completions	JCS Annual Target	Shortfall
2011- 2012	593	718	125
2012-2013	430	718	288
2013-2014	476	718	242
2014-2015	554	718	164
2015-2016	470	718	248
2016-2017	439	718	279
2017-2018	487	718	231
Total	3449	5026	1577

3.1.43 Colethrop Farms Limited agree that Gloucester City will be reliant on neighbouring authorities to meet its future housing growth. Housing delivery in Gloucester clearly constitutes a strategic matter requiring cooperation across authorities in accordance with paragraph 24 of the NPPF which states:

“Local Planning Authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies on strategic bodies, on strategic matters that cross administrative boundaries.” (NPPF, 2018).

3.1.44 In terms of the location of new homes, the priority should be in those which have the greatest ability to contribute to the achievement of sustainable development in accordance with paragraph 16 of the NPPF. As recognised by paragraph 268 of the JCS Inspectors Final Report (2017), the immediate review of Gloucester’s housing supply following the adoption of the JCS has allowed for the consideration of options from both within and outside the JCS area.

“The JCS authorities’ Statement of Co-operation with Stroud District provides a tool for exploring the possibility of housing land supply in Stroud contributing to the JCS authorities’ needs, where it is reasonable to do so and consistent with achieving sustainable development.” (Paragraph 269 of the Final JCS Inspectors Report, 2017).

3.1.45 It is noted that Tewkesbury are currently already considering options to account for previous delivery shortfall to the north of Gloucester. The ongoing JCS Issues and Options consultation also recognises that Cheltenham is constrained and unable to wholly accommodate its own growth within its administrative area (see paragraph 7.1 of the consultation). It is therefore

positive and rational to consider sustainable and deliverable options for housing growth to the south of Gloucester and outside of the JCS administrative area.

- 3.1.46 The development options proposed within the Emerging Strategy Paper including mixed use development which provides the opportunity for economic growth in locations already served by the M5 and the rail network.

4.3c Do you support the idea that the Local Plan should seek to manage the cumulative impacts of growth on individual settlements?

- 3.1.47 In addition to identifying a settlement hierarchy for existing settlements, it is important to realise the role that the proposed new settlement at Wisloe can fulfil in this structure.

4.3a Are any of the settlements in the wrong tier and, if so, for what reason?

- 3.1.48 As set out in response to Question 4.2c, Haresfield needs to be considered in the context of wider growth around the village and how this impacts upon its function.

- 3.1.49 Colethrop Farms would be pleased to comment on question 4.3a once the evidence base has been published by the Council.

4.3b Should Tier 4 and 5 settlements be included within the hierarchy or treated as ‘open countryside’

- 3.1.50 Development in and around sustainable rural settlements should be permitted to support existing rural services, such as primary schools, shops, bus services and public houses etc.

- 3.1.51 The Council should consider rural small settlements, which are located very close to strategic employment areas (such as Haresfield), for further modest growth (housing or mixed use). In such places development may be able to support new community uses which support its long-term sustainability.

4 Gloucester Fringe

5.1a Have we identified the best site(s) at each town and village?

- 4.1.1 Colethrop Farms Limited support strategic growth at Hunts Grove and support the allocations PS30, PS31 and PS32, as set out in page 76 of the consultation document.
- 4.1.2 Retaining existing housing and employment allocations (PS30) at Hunts Grove will contribute to the delivery of sustainable development – providing both homes, jobs and services in a sustainable location. There is a commitment to deliver the existing allocations at Hunts Grove from both Stroud District Council and we are working towards its delivery.
- 4.1.3 The extension to Quedgeley East has planning permission (SA4a). St Mowden are already progressing towards the commencement of development to meet employment needs of the current Local Plan. Colethrop Farms Limited support further employment in this location, however the question is whether PS32 may be better used as a mixed-use site? This could create a more balanced development on the south side of the M5, which would help to respect Haresfield while at the same time responding to the benefits of this strategically important location.
- 4.1.4 Haresfield village also has a role to play in providing sustainable development at a scale that is commensurate with the settlement. It is a sustainable location with access to major employment and many services and facilities. New development may through consultation, be able to enhance the long-term sustainability of the settlement.

5 Conclusions

- 5.1.1 Overall, Colethrop Farms Limited support Stroud District Council in its continued production of the Local Plan. It is positive that the Emerging Plan has addressed the role of new settlements and is flexible, rather than over-prescriptive, to encourage development delivery.
- 5.1.2 Site plans have previously been submitted to Stroud District Council in respect of the Call for Sites process identifying land controlled by Colethrop Farms Ltd. Should the Council see further clarification, this can be provided.