

Consultation response form PART B:

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

Your name

Your organisation or company

D2 Planning Limited

Your client's name/organisation
(if applicable)

Bovis Homes

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

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

Question number: 2.3, 3.2 a & b

Please use this box to set out your comments:

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

The 2017 Government White Paper "Planning for the Right Homes in the Right Place" seeks to adopt a standardised approach to the provision of housing within emerging Local Plans. The White Paper sets out a series of transitional arrangements which are relevant to the preparation of the emerging Stroud District Local Plan. It advises that if a Plan has not been submitted for examination on or before 31st March 2018, or before the revised NPPF is published (whichever is the later) the Plan should be continued using the new standardised method. In the case of Stroud District, the indicative assessment of housing need is identified for the period 2016 to 2026 as 635 dwellings per annum. The current adopted Local Plan provides for 448 dwellings per annum, a shortfall of 187 dwellings per annum. Clearly if the Government's commitment to fixing the broken housing market is to be realised, the emerging Local Plan must adopt this higher housing provision and ensure that any shortfall in housing provision in the current Local Plan is also met.

Bovis controls some 9.95 hectares of land and have an interest in 11.3 hectares of land adjacent to Brockworth Airfield, Upton St Leonard (attached plan). They believe that the land is eminently suitable to be developed for residential development as an extension to the land to the north which is currently being developed by a number of residential developers.

We agree with the Issues and Options Plan in that there is a close relationship between the northern part of Stroud District and the City of Gloucester where many of the facilities and services supporting residents living in the District located within or on the edge of Gloucester. It must therefore be 'sound' to build on that relationship and look to strengthen these linkages and provide for additional residential and community development. Indeed Bovis have previously made representations to the adopted Local Plan which supports such an approach.

We further support the identification of land identified as G3 South West of Brockworth (for housing and



community use). Potential impact summary states: -

“An initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to a designated heritage asset.

An initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to a designated natural environment site provided buffer and linkage is provided to avoid isolation and fragmentation of protected habitat. Note that the assessment does not consider whether there are protected species on the site.

The site was not considered in the current settlement landscape sensitivity assessment as it is not adjoining settlement development limits. The gap between Brockworth and Upton St Leonard is vulnerable. When a wider landscape analysis is undertaken the site could be reviewed for housing or community use when its gap function and setting in the AONB function is more clearly established.”

The G3 site has been identified as a potential allocation without any landscape consideration nor any consideration of noise mitigation from the M5 motorway. Issues related to gap function etc are considered to require further consideration but the assessment concludes that the site is acceptable for development.

The land controlled by Bovis is located immediately to the east of this land but has not been identified as a strategic allocation because: -

“The site is not suitable for development because of the likely high landscape impact, narrowing the gap between Brockworth and Upton St Leonard. Landscape features indicate an open parkland landscape setting of a former manor estate. The area provides an immediate setting for the AONB and shows landscape characteristics with the SE area being more open. There are therefore potential impacts preventing sustainable development in this location.”

It is interesting to note that the Bovis land has previously been considered suitable, available and deliverable for residential development in previous SHLAA assessments (attached). No landscape or heritage objections were previously raised and there is no consideration as to possible mitigation which can be provided. Bovis accept that the land could be developed in conjunction with Site 3 to provide a sustainable urban extension. Furthermore, we believe that the land could be development separately. The development would be capable of mitigating any landscape impact; ensuring that any gap between Brockworth and Upton St Leonard is maintained together with the setting of the AONB. We would add that there is no policy which identifies a gap between these two settlements. The additional work that Bovis has undertaken has concluded that there are no biodiversity, technical or other constraints to the development of this land.

In view of the above, the land controlled by Bovis to the east of G3 (Site SPT005) should be identified for development either separately or in conjunction with Site G3.



LAND WITH
PLANNING
PERMISSION

PROPOSED OPTION LAND
113851 sq m
28.132 acres

BOVIS LAND
100476 sq m
24.827 acres



**BOVIS
HOMES**

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PROJECT		
Additional Land, Brockworth		
DRAWING TITLE		
LOCATION PLAN		
DRAWN BY	DATE	SCALE
	March 2012	1:5000 @ A3
PROJECT NO.	DRAWING NO.	REV.
	0_103	