

Black Box Planning on behalf of Taylor Wimpey

Hearing Statement

Matter 6: Site Allocations &

Matter 6E Gloucester's Rural Fringe Site Allocations

1. This Hearing Statement has been prepared on behalf of Taylor Wimpey and should be read alongside the Representations submitted in response to the pre-submission (Reg19) version of the Stroud Local Plan (SLP) in May 2021. It seeks to respond to specific questions set out in the Inspector's Matters, Issues and Questions raised in respect of Matter 6 and 6E, where relevant to concerns held by Taylor Wimpey.
2. These representations are submitted with regard to TW's control over land (130 ha) at Whaddon, with neighbouring promoters L&Q controlling land to the north and Newland Homes controlling a small proportion of the site fronting Grange Road. All parties have been working jointly in respect of the emerging strategic allocation at Whaddon to ensure a comprehensive approach is taken to the masterplanning and deliverability of the site and associated infrastructure.

Matter 6a General Questions

3. Core Policy CP5 sets out environmental development principles for strategic sites.

a. How does the policy relate to the strategic site allocation policies, which specify the location of the site, the density of development and set out detailed requirements including the production of a masterplan? What are the reasons for duplicating these elements?

3. Criterion 3 and 5 of CP5 read as site selection requirements when the local plan has already identified the location of strategic sites therefore rendering the policy somewhat superfluous.

b. How does the policy relate to other Plan policies e.g. Core Policies DCP1 and CP14 and Delivery Policies ES1, ES2 and ES3? What are the reasons for any duplication and is this justified?

4. In considering the questions above, TW are of the view that policy CP5 duplicates other policy requirements in the plan. For example, CP4 and CP14 provide policy

requirements relating to design quality which adequately address the themes of policy CP5.

c. How will the requirements A-H in the policy be measured and how will a decision-maker know if the required statement accords with the requirements? What are the benchmarks for assessment?

5. It is considered unnecessary for the assessments associated with A-H to be a policy requirement as such matters are required to be addressed via the Council's validation checklist.

d. Is it clear that the policy applies to all strategic sites set out in the Plan? Are all the requirements relevant to residential and employment strategic sites and are they justified and viable?

6. It is not clear how the Sharpness new settlement allocation conforms with criteria 3 of CP5.

e. Is the policy and supporting text clear on what a Construction Environmental Management Plan would contain and how will a decision-maker determine when this would need to be produced? Is this approach justified?

f. Overall, is the policy consistent with the Framework and is it clear how it relates to national planning guidance including the National Design Guide and National Model Design Code?

7. It is unclear what is meant by the second criteria of the policy in respect of 'low impact in terms of the environment'. The policy is too vague and the Council has provided no greater clarity in responding to earlier representations in this regard. As above, the reasoning for the policy is unclear and it unnecessarily duplicates other policies.

4. Site allocations that include housing development specify dwelling capacity figures.

a. Is it clear how these have been determined for each site allocation? Are they based on the suggested yields from the SALA, or have they been updated to take account of more recent developer evidence or detailed assessments?

b. Is the scale of housing for each site allocation justified having regard to any constraints and the provision of necessary additional infrastructure?

c. Do the site allocations achieve appropriate densities and make effective use of land, in accordance with the Framework?

d. What are the reasons for using different terms for setting out the number of dwellings within each policy, such as 'comprising', 'comprising up to' and 'comprising approximately'? Is there a particular explanation as to why some sites are restricted by an 'up to' number and is this approach consistent with national policy?

e. Overall, is the development density and capacity for each individual site justified?

8. In response to the questions above, TW and the adjoining promoters have collaborated towards a comprehensive masterplan approach to derive the proposed site capacity as circa 3,000 dwellings. The TW proportion of the site has been informed by a full suite of technical work including careful consideration of constraints and infrastructure requirements to determine the site capacity at an appropriate density.

5. Many of the site allocations propose a mix of development but only the number of dwellings is specified. Where other uses such as employment are also sought, why is the size of that other use (i.e. floorspace or land area) not also specified? How will a decision-maker determine if a future development proposal meets the policy and identified needs, if the requirements are not clearly defined?

9. In respect of Whaddon, the exact make-up of ancillary mixed use for the local centre and community hub will be influenced by market interest which can only be firmly established when the site has some planning status. The TW masterplan (**enclosed at Appendix 1**) makes provision for a multitude of ancillary uses but these will be tested through marketing with necessary adjustments (for example if a nursery operator is secured or the size of store which convenience retailers are operating their model on). Such requirements fluctuate so it is difficult to stipulate exact floor space provisions at allocation stage.

14. Has an appropriate lead-in time and delivery rate been used when determining the delivery timeframe for each site (whether residential, employment or mixed use) and is this realistic?

10. In submitting a delivery trajectory to the Council for inclusion in the SoCG, TW, L&Q and Newland Homes have adopted what is considered a cautious and realistic delivery trajectory.

- 15. Overall, is each site allocation justified, viable and deliverable or developable (in accordance with the Framework definitions)?**
16. We do not repeat our previous representations to the SLP, but land at Whaddon is justified, viable and deliverable.

Matter 6e Gloucester's Rural Fringe Site Allocations

Strategic Site Allocation Policy G2 Land at Whaddon

40. The site is proposed to be 'safeguarded' to meet future housing needs of Gloucester City, if required. The policy seeks a development brief incorporating an indicative masterplan, that will address 22 listed requirements. This includes the provision of at least 3,000 dwellings, 8 serviced plots for travelling showpeople and necessary infrastructure.

a. If this is proposed as a safeguarded site and a decision on whether it would be allocated for development would be made through a future review of the Plan, why is it necessary at this stage to set out specific requirements for the site?

17. For the reasons set out in our Matter 2 and Matter Statements, for the SLP to be found sound, it is necessary for the Whaddon site allocation to be confirmed in this SLP without further delay or deferral. The site's status in the plan should be changed from a 'safeguarded' site to a site allocation through modifications.
18. The detailed allocation policy is required to ensure the site can come forward early in the SLP period in order to address local housing need including the extant housing shortfall in Gloucester City.

b. Are all the 22 listed requirements justified by up to date robust evidence and are they sufficiently clear and effective in their level of detail? Do any duplicate other Plan policies and if so, why?

19. Consistent with our earlier representations, TW comment on the 22 criteria as follows alongside further consideration of duplication with policy requirements elsewhere in the SLP.
1. Support the site being identified for at least 3,000 dwellings with 30% affordable housing;
 2. Object to the requirement for serviced sites for showpeople due to the lack of evidence to demonstrate how site selection process has been determined and

testing of any reasonable alternatives, including for example land at Hardwicke or Moreton Valance. We note the updated needs assessment but no evidence regarding site selection has informed this requirement. Furthermore, we understand the Gloucestershire authorities intend to undertake a call for sites to address such requirements during 2023. TW do not intend to submit land at Whaddon G2 as an available or suitable site for travelling showpeople provision.

3. Clarification is required on the school provision with an update to be provided from Gloucestershire County Council to reflect its update methodology of pupil yield calculations and capacity assessments.
4. No objection as masterplan has flexibility for uses within the community core area should a party come forward to acquire land for a surgery. This can be explored through a marketing exercise once the allocation is confirmed.
5. The policy should recognise overall space provision on the masterplan as overprovision of certain types of green space may be preferable for environment/habitat creation resulting in modest under-provision of other types of green space. The policy should allow a degree of flexibility.
6. On mitigation welcome as masterplan for Whaddon incorporates on site mitigation with abundant, accessible, and attractive recreational spaces. Requirement duplicated ES6.
7. No objection to local centre as masterplan seeks to deliver a local centre on the Stroud Road frontage.
8. No objection to buffers where appropriate and justified.
9. No objection but duplication with ES4.
10. No objection but duplication with ES4.
11. No objection but clarification required in respect of 'sensitive landscape' as the site is bounded by the M5 and does not adjoin the AONB. The sensitivity of Whaddon Church is recognised and the masterplan responds accordingly in terms of retaining generous landscape setting. The policy requirement also duplicates ES7 and ES10.
12. No objection, walking and cycling intrinsic to the masterplan. Requirement overlaps with EI12.

13. No objection, connectivity intrinsic to the masterplan.
14. And 15/16/17/18/19/20 – No objection but 18 (EV charging) is duplication of building regs and 19 has some overlap with E112.
21. No objection - IDP needs to reflect updated requirements for county education/other infrastructure following technical analysis and testing
22. No objection on understanding that employment uses are ancillary to local centre/community core. The masterplan does not envisage large business park for example owing to the site context and local employment provision.

c. Have all site constraints and development impacts been robustly assessed, particularly as regards highways and opportunities for sustainable modes of transport?

20. Yes, the site has been subject to strategic traffic modelling and more scheme specific traffic modelling in relation to our forthcoming planning application to ensure that the allocation and development do not result in unacceptable highway impacts and make appropriate provision for promoting sustainable modes of transport. The emerging proposals have been subject to dialogue with County Highways and Stagecoach. TW have also been working with the adjoining promoters L&Q Estates and Newland Homes to ensure a coherent masterplanning approach emerges, including with regard to connectivity for bus, cycle and pedestrian routes through the site.
21. The Whaddon allocation provides opportunities to strengthening sustainable connections across the adjacent railway line and with Waterwells Business Park to the west. This will be delivered through the provision of a modal filter onto Naas Lane, providing access for sustainable transport modes only. To further enhance this link, a footway will be provided along Naas Lane to join existing infrastructure to the west. The provision of the footway will be facilitated through the provision of shuttle working section at the Naas Lane Railway bridge.
22. The development at Whaddon will deliver the much needed improvement works to the St Barnabas junction. The proposed solution being put forward by TW comprises a signalised crossroads arrangement alongside enhanced provision and safety for pedestrians and cyclists, all which is deliverable within the constraints of the existing highway boundary. The scheme will also allow the opportunity to integrate bus priority signals, therefore enhancing opportunities for sustainable modes of travel, including for existing background trips.

23. We will be undertaking community engagement on our proposals for St Barnabas in advance of submitting a planning application. The highway impacts of the Whaddon allocation have been robustly tested and the site remains suitable, acceptable and deliverable in respect of highways with a clear emphasis towards promoting more sustainable movement.

d. Are necessary infrastructure requirements and mitigation measures proposed within the policy and would these ensure the development was sustainable, particularly in terms of travel modes?

24. Yes, subject to our comments above and covered by our representations, the masterplan emerging for the site responds to the infrastructure requirements of policy G2. This includes providing a layout which prioritises pedestrian, cycle and bus movements and convenient routes to connect to the wider locality and footway/cycle/highway network. The Taylor Wimpey proposal anchors this mobility strategy with a modal interchange located at the northeast corner of the TW land control where accessibility to the Stroud Road frontage provides the optimum location for the interchange. This is then complemented by a number of neighbourhood mobility hubs throughout the masterplan whereby bus stops are located alongside secure cycle storage or a cycle locker.

25. In addition, TW's highway consultants have entered into a statement of common ground with Stagecoach West regarding transport matters and particularly the proposed bus routes to serve the development site. A copy of this SoGC is attached at **Appendix 2** to this statement.

e. Has the boundary been correctly drawn on the maps within the Plan (pages 155 and 160) and on the policies map?

26. TW are comfortable that the G2 allocation boundary includes all land under their control and being promoted for development.

f. Some representors raise other concerns relating to the development of the site, including the impact on wildlife, flooding and the character of the area and the recreational pressures on the AONB. Have such factors been suitably assessed as part of the process to allocate/safeguard this site?

27. The local plan evidence base include SA considers all relevant environmental impacts to help inform the site selections process undertaken by the Council. The SLP plan has also been subject to several rounds of stakeholder engagement to arrive at this point.

28. From TW's perspective, such concerns do not reflect the evidence provided by detailed assessment of the site. The environmental baseline of the site is relatively low with the watercourse, hedgerows, trees having been historically managed to maximise pasture for intensive livestock grazing. The site has been subject to a full suite of ecological surveys, landscape and flood risk assessments to ensure no unacceptable impacts arise from development, but rather the masterplan takes the opportunity to enhance biodiversity across the site, including a new amenity park along the re-profiled Daniels Brook corridor at the heart of the scheme. Assessment of the brook corridor indicates that the scheme will realise a 100%+ biodiversity net gain with implementation of the redesigned water course with natural features and associated habitat creation. The benefit of development on this scale is that masterplanning enables on-site mitigation measures to deal with the vast majority of perceived environmental impacts.

g. The site does not form part of the housing trajectory. If the site was found to be required to meet unmet housing needs, what would be its delivery timeframe and would this be realistic?

29. TW, L&Q and Newland Homes have provided a trajectory as part of the draft Statement of Common Ground for Whaddon. It is expected the Council will be able to submit the SoCG to the examination. In summary, the site is expected to yield 80 dwellings in 24/25 and 200 dwellings annually thereafter through to completion. The trajectory provided is considered to present a realistic delivery rate for the site.