

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Sustainability Assessment

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to attached sheet.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with

the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to attached sheet.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

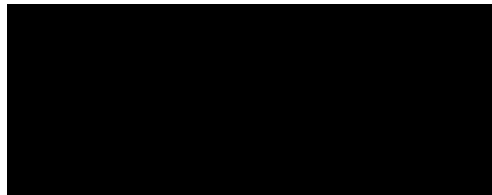
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

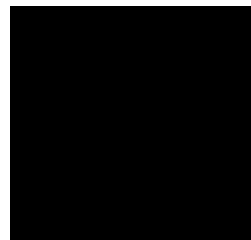
Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

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Date:

A large black rectangular redaction box covering the date area.

Representations in respect of Pre-Submission Draft Local Plan Sustainability Appraisal Report (2021)

Site G1 - Land South of Hardwicke

Name: [REDACTED]

Organisation/Company: RPS Group

Client Name/Organisation: Redrow Homes Ltd

SA Scores in relation to SA Objectives

In respect of the SA and associated scores that have been attributed to the to Land South of Hardwicke in relation to each SA objective in 2019 and 2021, we set out below further information/justification where necessary, in relation to each objective where the score should be adjusted on the basis of the information that is available. Accordingly, and in conformity with the SA methodology, we considered that the following SA matrix is applicable in respect of Land South of Hardwick (G1):

Table 1: SA Matrix for G1: Land South of Hardwicke (dwelling, local centre, community uses, primary school, green infrastructure, open space and strategic landscaping)

SA Objective LPA Justification 2019 SA Report (LUC) –2021	2019 Score	2021 Score	Redrow Suggested Score	Redrow Justification
SA 1- Housing LPA Justification 2019 This site has been identified as having potential to contribute towards future housing needs. The Draft Local Plan Site Allocation Policy sets out that the site may have potential to contribute towards future housing needs and so is included within the Draft Local Plan at this stage for the purposes of public consultation. The site is therefore allocated for a strategic mixed-use development, including approximately 1200 dwellings. SA Report (LUC) –2021 Positive effect is significant as the site will deliver more than 600 homes.	++	++	++	Agreed. The site will significantly contribute to future housing needs through the delivery of circa 1350 homes.

<p>SA 2 – Health</p> <p>LPA Justification 2019 The site is not located within 800m of a GP. The site is located within 800m of a council play area, a green space and a protected outdoor playspace but also contains a green space and a protected outdoor playspace which could be lost to development. The site is not located within 400m of a walking or cycle path. This site now includes open space uses in line with the Draft Local Plan Site Allocation Policy.</p> <p>SA Report (LUC) –2021 Notable health improvements will be made with a surgery being delivered as part of the development.</p>	<p>++/?</p>	<p>++/--?</p>	<p>++</p>	<p>The site does not include an area of protected outdoor play space as recorded within the LPA 2019 SA Report but does include existing public rights of way which cross the site.</p> <p>Apart from the public rights of way the site forms private land which is used for arable farming. Whilst the site encompasses existing areas of open space (e.g Village Green), these areas are substandard and not fit for any meaningful recreational purpose other than walking. The illustrative masterplan for the site is landscape led and provides meaningful areas of open space including enhancing and enlarging existing areas including the Village Green.</p> <p>The illustrative masterplan also includes a local centre in which it is anticipated that a community building/health care facility could be provided. A significant positive effect should therefore be recorded.</p>
<p>SA 3 Social Inclusion</p> <p>LPA Justification 2019 Residential site options will all have negligible effects on this objective.</p> <p>SA Report (LUC) –2021 Development at all strategic site allocations will include some uses (such as community, sports and/ recreation) which could contribute to the creation of more engaged and vibrant communities. The positive effect is expected to be significant at Hardwicke given that Strategic Site G1 is to be delivered to incorporate a new local centre.</p>	<p>0</p>	<p>0</p>	<p>++</p>	<p>The 2019 LPA SA Report outlines that all residential site options would have a negligible effect in respect of social inclusion. We are pleased to see that the 2021 SA Report now recognises the significant positive contribution that a local centre will make to development and the local area as a whole (although this fails to be reflected in colour coded summary assessment). The site itself will accommodate a mix of housing including affordable housing. The site will also accommodate a local centre, community uses, primary school and an enhanced allotment area within a Tier 3a settlement which would therefore benefit from an increased range of facilities. It is therefore considered that the site will have having a positive effect on the existing and expanded community in terms of social inclusion. A significant positive effect should therefore be recorded.</p>
<p>SA 4 Crime</p> <p>LPA Justification 2019</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>Agreed.</p>

Residential site options will all have negligible effects on this objective.				
<p>SA 5 Vibrant Communities</p> <p>LPA Justification 2019 This site is on greenfield land. This site now includes community uses in line with the Draft Local Plan Site Allocation Policy.</p> <p>SA Report (LUC) –2021 Development at all strategic site allocations will include some uses (such as community, sports and/ recreation) which could contribute to the creation of more engaged and vibrant communities. The positive effect is expected to be significant at Hardwicke given that Strategic Site G1 is to be delivered to incorporate a new local centre.</p>	+	++	++	Agreed. As SA3 – the site includes community uses.
<p>SA 6 Services and Facilities</p> <p>LPA Justification 2019 This site is at a tier 3a settlement.</p> <p>SA Report (LUC) –2021 The site would incorporate a new local centres with a range of uses which is likely to substantially improve access to services and facilities in the area. As such, significant positive effects are expected.</p>	+	++	++	Agreed.
<p>SA7 Biodiversity</p> <p>LPA Justification 2019 The site is not within 1km of an internationally or nationally designated site. The site is within 7.7km of the Severn Estuary SAC/SPA/Ramsar site. It is also within 250m of Gloucester and</p>	+/--?	+/--?	+	The site does not include an area of protected outdoor play space as recorded within the LPA 2019 SA Report. The site has been the subject of a Phase 1 Habitat Survey and associated relevant species surveys and the site has been assessed to have a low ecological value overall.

<p>Sharpness Canal KWS. There are existing GI assets (a green space and a protected outdoor playspace) within the site that could be lost to development. This site now requires the provision of green infrastructure in line with the Draft Local Plan Site Allocation Policy.</p> <p>SA Report (LUC) –2021 Existing GI assets at the site may be lost. Likely recreation effects with regards to the Cotswold Beechwoods SAC and Severn Estuary SAC/SPA/Ramsar have been identified in combination with other strategic housing sites.</p>				<p>We disagree with the 2021 SA Report which asserts that the existing GI assets will be lost at the site. The illustrative masterplan for the site is landscape led and incorporates strong GI principles including the provision of open space corridors which will act as green fingers across the site creating strong connectivity between existing hedgerows, trees, areas of open space and the Village Green. No existing GI assets will be lost due to the development – in fact existing on site features/habitats will be enhanced through additional planting and management. The masterplan takes full account of all biodiversity assets on site and will achieve a Biodiversity Net Gain, thus a tangible positive impact will be achieved. Furthermore, the development will consider any identified impacts in relation to the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC and will contribute to the approved SDC mitigation schemes or undertake an independent mitigation strategy as appropriate. As such, it is considered that a positive effect should be recorded.</p>
<p>SA8 Landscape/Townscape</p> <p>LPA Justification 2019 The majority of the site is in an area which was rated in the Landscape Sensitivity Assessment as being of medium/low – medium sensitivity to residential development. It is not within the Cotswolds AONB or within 500m of the AONB. It is now required that development at the site incorporates strategic landscaping in line with the Draft Local Plan Site Allocation Policy. This may potentially limit impacts in terms of the local landscape setting, however, impacts will be dependent upon the specific design which is unknown at this stage.</p> <p>SA Report (LUC) –2021 Minor negative effects are expected as the site is located in an area that has low-medium or medium landscape sensitivity to development. The site is also expected to have a positive effect</p>	-?	+/-?	0	<p>The site is in an area which is well contained and was rated in the Landscape Sensitivity Assessment as being of medium/low – medium sensitivity to residential development as set out in the LPA SA matrix. The site is not within the Cotswolds AONB or within 500m of the AONB. The site incorporates strategic landscaping in line with the Draft Local Plan Site Allocation Policy. This will limit impacts in terms of the local landscape setting. Specifically, the illustrative masterplan for the site is landscape led and incorporates strong GI principles including strategic landscaping along the canal and boundaries of the site whilst also providing open space corridors which act as green fingers ensuring connectivity across the site. Any potential impacts on the local</p>

<p>in relation to SA objective 8 given the requirement through the site allocation policies for the incorporation of structural landscaping buffers and/or incorporation of new native hedgerows and trees included as part of development.</p>				<p>landscape setting will therefore be limited. A negligible to minor positive effect should therefore be recorded.</p>
<p>SA 9 Historic Environment</p> <p>LPA Justification 2019 This site scored 3 in the SALA heritage assessment.</p> <p>SA Report (LUC) –2021 This site scored 3 in the SALA heritage assessment.</p>	--	--	0	<p>The site does not have significant heritage constraints. The site itself contains no designated heritage assets. The only known non-designated assets are the course of a Roman road, some relict ridge and furrow and, bounding the site, the Gloucester & Sharpness canal. Whilst there are a number of listed buildings in the vicinity of the site, the design of development will ensure that the character and setting of each of the built heritage assets and the Roman road are protected. Landscape buffers and planting will be introduced to screen off site listed assets to minimise impact and therefore in the long term, once established, no negative impact/harm is expected.</p> <p>Any impacts to heritage receptors will be negligible, or at the lower end of 'less than substantial harm'.</p>
<p>SA 10 Air Quality</p> <p>LPA Justification 2019 The majority of the site scored 83 in the Stroud SALA Transport Accessibility Assessment. The site is expected to be delivered to prioritise walking, cycling, and public transport over the use of private car in line with the draft policy. These types of improvements could have benefits in terms of limiting the release of air pollutants as new development is occupied.</p> <p>SA Report (LUC) –2021 The site scored between 70-80 in the SALA transport assessment and therefore a minor negative effect is expected for the site. Positive effects are also expected as part of an overall</p>	+/-	+/-	+	<p>The site is not located within an air quality management area and part of the site has already been the subject of an air quality assessment which concluded any effects of the development on air quality would not be significant.</p> <p>The site is located in an accessible sustainable location and the development will provide opportunities for increased connectivity to public transport as well as improved walking and cycling links. These improvements will limit the release of air pollutants for existing and future residents. A minor positive effect should therefore be recorded.</p>

<p>mixed effect due to sustainable transport measures outlined in the site's respective allocation policy.</p>				
<p>SA 11 Water Quality</p> <p>LPA Justification 2019 The site is not within a Drinking Water Safeguarding Zone or a Source Protection Zone.</p> <p>SA Report (LUC) –2021 The site is not within a Drinking Water Safeguarding Zone or a Source Protection Zone and the development will tackle waste water generated by the development.</p>	0	+	+	<p>Agreed. The site is not within a Drinking Water Safeguarding Zone or Source Protection Zone and the development will include measures to deal with waste water generated by the development.</p>
<p>SA 12 Flooding</p> <p>LPA Justification 2019 The site is on greenfield land within flood zone 3a or 3b.</p> <p>SA Report (LUC) –2021 The site is on greenfield land within flood zone 3a or 3b.</p>	--	+/--	0	<p>The majority of the site is located within Flood Zone 1, not 3a or 3b as set out in the 2019 and 2021 SA Reports. The flood risk from all sources to the site and the surrounding area has been investigated and it has been demonstrated that the areas within and adjacent to the site (mainly associated with Shorn Brook) which do lie within flood zone 2, 3a or 3b are not at risk of flooding (please refer to the submitted Constraints and Opportunities Plan which illustrate these areas). In any event, the illustrative masterplan directs all built development away from these areas. A negligible effect should therefore be recorded.</p>
<p>SA 13 Efficient Use of Resources</p> <p>LPA Justification 2019 The site is relatively large in size and on greenfield land. The site is within an area of Grade 3 agricultural land.</p> <p>SA Report (LUC) –2021 The site is relatively large in size and on greenfield land. The site is within an area of Grade 3 agricultural land.</p>	--	--	--	<p>It is noted that all Grade 3 agricultural land is scored 'red'/likely to have a significant effect with the 2019 and 2021 SA reports. It should however be recognised that the site makes efficient use of a greenfield site for housing in accordance with local housing need. A recent 2021 ALC survey for the site confirms that the site is classified as comprising 97% Grade 3B with only 3% of the land being classified as 3A.</p>

<p>SA 14 Climate Change</p> <p>LPA Justification 2019 Residential site options will all have negligible effects on this objective.</p> <p>SA Report (LUC) –2021 Residential site options will all have negligible effects on this objective</p>	0	0	0	<p>Agreed. The development proposals we be supported by an Environmental Assessment in any case.</p>
<p>SA 15 Waste</p> <p>LPA Justification 2019 This site is on greenfield land.</p> <p>SA Report (LUC) –2021 This site is on greenfield land.</p>	0	0	0	<p>Agreed.</p>
<p>SA 16 Employment</p> <p>LPA Justification 2019 The site is located within 600m of key employment sites (Quedgeley West; Hunts Grove / Quadrant Distribution Centre) but is not at a Tier 1 or 2 settlement.</p> <p>SA Report (LUC) –2021 Site is within close proximity of existing key employment sites (Quedgeley West; Hunts Grove / Quadrant Distribution Centre) but is not at a Tier 1 or 2 settlement.</p>	+	+	+	<p>Agreed. The site is well located to key employment areas.</p>
<p>SA17 Economic Growth</p> <p>LPA Justification 2019 The site is located within 800m of at least one existing primary school but is not within 800m of an existing secondary school. The site would provide a new primary school as part of the mixed use development in line with the Draft Local Plan Site Allocation Policy.</p>	++?	++?	++	<p>Agreed. The site is well located to key employment areas and would provide a new primary school and local centre as part of a residential-led mixed use development.</p>

SA Report (LUC) –2021

Site is expected to have a significant positive effect. New school facilities will be delivered.

