



To: Stroud District Council
From: Wisloe Action Group (WAG)
Date: 16th December 2020 (emailed)

Introduction

This document is submitted by Wisloe Action Group (WAG) in response to the Stroud District Local Plan Review Additional Housing Options Public Consultation October 2020. Broadly, the consultation document is broken into two sections; the first section covers analysis of the strategic spatial growth options and the second section covers analysis of the recently submitted development site proposals; in particular the two Additional Growth Points (AGP) at Moreton Valence / Hardwicke and Whitminster and the Sustainability Assessment evidence.

The major justification for Stroud District Council (SDC) undertaking the spatial review is in response to the Planning for the Future Whitepaper issued in August 2020 which '*proposed changes to the way Government calculates the minimum housing requirement for each Local Authority*'. For SDC, '*current monitoring indicates we may have to find land for an additional 1,050 – 2,400 homes between now and 2040*'. Recognising that Government is now re-assessing its position to address the levelling up between the North and the South, WAG questions the need to achieve a target number of dwellings in excess of the original target detailed in the 2019 Draft Local Plan consultation. WAG recognises the proposed Additional Growth Points sites need to be consulted upon, as they emerge, as part of the standard planning process and could form a significant part of the emerging plan.

This document from WAG comments on the Additional Spatial Options, and new housing development proposals and the SA before detailing its conclusions.

1.1 Spatial Options for Additional Housing Land

Question 1 asks "which strategy option(s) would you support, if additional housing land is required?"

Option A – Intensify (urban proposed sites)

Option B – Towns and villages

Option C – Additional growth point

Option D – Wider dispersal

Option E – Would you support a hybrid / combination option?

WAG SUPPORTS Option E - a hybrid / combination option

Q1f Option F – Another strategy

WAG SUPPORTS a Brown Field first approach to site selection.

Q2 Rationale Supporting Hybrid Strategy

WAG SUPPORTS a hybrid combination of Options A, B, C and F.

With Option A, the ‘*strategic urban extension sites*,’ identified as red circles in the illustration, identified a total of circa 2,280 proposed dwellings:

CAM North West – 700 dwellings

CAM North East – 180 dwellings

Huntsgrove Extension – 750 dwellings

Stonehouse Northwest – 650 dwellings

The consultation paper suggests the proposed urban development sites have planned average densities of around 30 dwellings per hectare (dph). If the average density of these urban extensions is increased from 30dph to 35 dph, which is typical for edge of settlement urban extensions, these allocations could potentially deliver 380 more homes (in total), as identified below:

CAM North West – 117 additional dwellings

CAM North East – 30 additional dwellings

Huntsgrove Extension – 125 additional dwellings

Stonehouse Northwest – 108 additional dwellings

The average densities per hectare could be increased to 35 by changing the mix of dwelling type rather than increasing the same type of dwellings per hectare on the same site.

Option B is a strategy to distribute the housing load more evenly throughout the district, albeit to primarily towns and larger villages. WAG supports this limited level of housing dispersal as it helps to remove undue significant reliance on realising the majority of new dwellings in the Severn Vale. WAG is therefore supportive of new housing proposals in Q7 which could deliver an additional 115 homes. The additional dwellings calculated under options A and B combined could deliver an additional 500 dwellings.

Numerous relatively small housing developments around the edges of towns and major villages can also limit the dependency on the need for significant additional infrastructure as existing facilities can be utilised, as well as existing employment being closer to the dwellings.

Option C proposes AGP’s to help fill the housing demand requirement. The major conclusion from the spatial assessment undertaken for SDC earlier this year was that probably three separate AGPs would be required to help achieve the increased total housing target as part of a hybrid solution. The 2019 Local Plan consultation detailed several proposed AGPs (including PS37) and this latest 2020 consultation introduces two more. All the proposed AGPs, which have been consulted upon individually, will need to be assessed and compared to determine their relative sustainability, deliverability and viability prior to recommendations made to the Environment Committee, Full Council and a decision made prior to the pre-submission 2021 Local Plan consultation. WAG has reviewed the site assessments for the two new AGP submissions contained in the 2020 SA and our findings are detailed in the WAG submission in answer to Q11.

WAG also agrees with the findings from the site reviews, and WAG’s own assessment, that proposed site PS37 is less sustainable, deliverable, and viable than the two new AGPs and other sites included in this consultation (PGP1 & PGP2).

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Option D is broadly Option B plus further small sites at Tier 4 villages and is unlikely to add significant housing numbers in view of limited potential for growth in smaller villages. Also, the consultation document identifies that adoption of this Option would trigger the need for SDC to look for more sites and carry out further consultation. This could result in a significant delay to the submission of the Local Plan. The current spatial consultation is focused on additional housing allocation only, it is not an entire review of the existing strategy. To date, WAG has been vocal in advocating wider dispersal of housing across the district to achieve a more even distribution, rather than to focus too heavily on the Severn Vale. Dispersal options should have been considered much earlier in the local plan process following feedback from previous consultations as this was the preferred option. WAG still maintains this view but recognises the need to get a Local Plan agreed and that a change in approach for 'additional housing' only will not generate the necessary change in strategy required from SDC. To avoid delaying submission of the Local Plan, WAG suggests SDC also reviews option D in parallel with the existing housing spatial strategy (but not to delay the local plan) to identify scope for any additional housing projects more widely throughout the district.

WAG propose that SDC should adopt a brownfield first approach to future housing provision (i.e. Option F). Regard must be had to the NPPF, which stipulates at paragraph 117 that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land. Focus should initially be centred around realising brownfield land before proposing a site that have the Best and Most Versatile Land which will be lost forever. Building on the highest quality agricultural land in the district is in conflict with to Stroud's commitment to CN2030 and need for greater self-sufficiency resulting from Brexit.

The Stroud Five Year Housing Land Supply (August 2019) identifies that historic evidence demonstrates that small site windfall deliveries have averaged delivery of approx.75 dwellings per annum. It is evident from the Employment Land Availability report (<https://www.stroud.gov.uk/media/1287101/ela-2020.pdf>) Tables 4A-D (Actual and Potential loss of B-Use Employment Land) that significant amounts of brownfield housing provision have been, and are likely to continue to come forward from current and former employment sites. These additional sites could deliver circa 450+ additional dwellings which do not appear to be taken into account in the existing target numbers of dwellings with the draft Local Plan numbers. SDC's development strategy must seek to maximise and prioritise brownfield development near to existing employment in order to reduce the need for development needing to occur on greenfield sites. The long-term impact on employment sites and reduced working in offices is not yet know, but it is likely that an increase to employment land will not be as significant as previously planned.

Therefore, in order to ensure that the target dwelling numbers are met and to provide the flexibility required for SDC to assess a range of options WAG is supportive of a hybrid approach which combines options A, B, C and F.

1.2 Spatial Options – Reserve Housing Supply

Q3 NO, WAG does NOT SUPPORT the approach of identifying a reserve site or sites. WAG does not believe that it is either necessary or desirable to identify a reserve site. To do so would create undue uncertainty in the selection of any identified sites. Instead, WAG believes that SDC should ensure that the most suitable, sustainable, deliverable, and viable proposed sites are selected from the outset in the Draft Local Plan. The biggest weakness of SDC's last proposed strategy is its dependence on too many major new developments within one particular cluster in the Severn Vale. It needs to be recognised that only so much development is capable of being delivered at the same time within any one area. This would lead to land banking and sites not delivering against the plan.

Limiting the development to AGPs at extreme ends of the district would help alleviate the risks of under-absorption, with replacement provision identified elsewhere in the district, where market absorption would not be an issue.

Furthermore, with regard to the need for a reserve site, WAG would point out that SDC is required to review its Local Plan on at least a five-yearly basis, therefore any delivery concerns could be addressed through this process.

Q4 As WAG does NOT SUPPORT a reserve site(s) then none of the options identified in Q4 are supported. See response to Q3.

Q5 No hybrid reserve housing strategy is supported as WAG does NOT SUPPORT a reserve site(s). See response to Q3.

Q6 WAG does NOT SUPPORT a reserve site(s) and therefore a trigger is not required, it is an academic question.

2.1 New Housing Sites

Q7 WAG broadly SUPPORTS development of the 5 smaller proposed sites at:

- 7a BER016 Hook Street Farm, Berkeley
- 7b BER017 Bevans Hill Farm, Berkeley
- 7c HAR017 Land at Sellars Road, Hardwicke
- 7d STR065 Beeches Green Health Centre
- 7e WHI012 South of Hyde Lane, Whitminster

The sites are all small to medium scale in size (ranging from 15 to 45 dwellings) and capable of delivering 115 dwellings in total. This is consistent with supporting the option B spatial strategy. Paragraph 68 of the NPPF requires local planning authorities to recognise the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, as they are often built-out relatively quickly. Paragraph 68 requests councils '*to promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved*'.

Q8 No, WAG is not aware of any other site(s) which could be considered for future housing development within this local plan.

2.2 Potential Growth Points

Q9 WAG SUPPORTS the two proposed growth point developments at:

- 9a PGP1 Land at Grove End Farm, Whitminster. Including SALA sites WHI007 and WHI014.
- 9b PGP2 Broad location at Moreton Valence / Hardwicke. Including SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009.

The sites are sustainable, viable and deliverable within this local plan.

WAG has reviewed the site assessments presented as evidence for these two new AGP submissions contained in the 2020 SA.

Proposed site PS37 is far less sustainable than both sites for the following reasons:

- Further from the main centres of employment, distance to M5 junctions and a higher dependency on commuting journey miles (SA2).
Note – Area 49 (PS37) is calculated to have 22088 jobs within 45 mins and a low number of jobs are accessed via public transport vs 92059 and high jobs access for area 41 (PGP 1 and 2).
Loss of predominantly Best and Most Versatile (MBV) Grade 2 agricultural land, highest quality in the district and very limited across the District. Note – The Promoters evidence presented an independent soil survey has been proven to be of insufficient standard to be considered for re-grading. The land quality remains at Grade 2 recorded with Natural England.
Promoter plans are not to move the high-pressure gas pipeline. This results in a considerable additional constraint (vs other growth points) resulting in an inability to convert large areas of the site for housing due to the safety constraints posed by the pipeline's proximity to the M5, rail line, A38 and A4135. (SA13).
- Proposed site PS37 will lead to coalescence within the Parish and with Cam and Dursley. It would not be a stand-alone development. It would be an urban extension beyond the parish boundaries of Cam. (SA8).
- Surface walk finds alone confirm the likely presence of at least one and possibly more Roman buildings on the proposed PS37 site. Gloucestershire County Council Heritage Team are aware of the sensitivity of the site (SA9).
- The topography of proposed site PS37 being circa 25 feet lower than the M5 (which runs the full length of the site), bisected by the rail line (raised and ground level) and 40' beneath the A4135 / M5 flyover results in the site suffering from a range of significant noise issues. Other potential AGPs by comparison are further from the M5 / railway line or the M5 runs through a cutting to provide natural acoustic shielding etc (SA5).
- Close proximity to major transport links (M5, A38, A4135 and rail network) coupled with the highest commuter mileage option produces the most undesirable air quality outcome (SA10).
- The same topographical issues result in the proposed PS37 site region, including Cambridge and Slimbridge villages, being susceptible to surface water and sewerage flooding. Furthermore, the inadequate desktop consultation failed to mention this or the recent attempts at reducing both types flooding undertaken by Gloucestershire County Council and Severn Trent Water which have only partially reduced the threat. Given the very high-water table, suggestions that SUDs on proposed site PS37 can solve the surface water flooding problem without inundating existing settlements is wishful thinking (SA12).
- The Slimbridge and proposed PS37 site area in particular falls entirely within a Drinking Water Safeguarding Zone, as opposed to being near to one.

- Although it was not raised in the consultation SA, Assessment Area 49 of the ‘Strategic Growth Option Report’ also confirmed the entire proposed PS37 site will require sterilisation of mineral resources prior to development.
- The numerous infrastructure constraints including the high-pressure gas pipeline which the HSE states “No Build” results in proposed PS37 site being unviable and undeliverable.

WAG is of the opinion that many of these issues were not recognised and assessed fully during the SA assessment. These points are detailed more fully in the WAG submission in response to Q11 for part 3 of the consultation.

Q10 No, WAG is not aware of any other site(s) which could be considered for future housing development within this local plan.

Q11 Comments on the Sustainability Appraisal that accompanied the consultation document

The Sustainability Assessment commentary mirrors the SA structure, commenting separately on the Additional Spatial Options and New Growth Points before outlining conclusions.

Additional Spatial Options

- 1.26 The A419 is *‘the most sustainable’* of the three option C cases as set out in SDC’s evidence documentation.
- 1.27 Option C1 (A38) is a relatively long road compared with the other two roads and it is therefore difficult to apply each of the SA criteria appropriately. All villages located on the A38 allow for the continuous flow of traffic to the major M5 junctions, which also provides overflow capacity should the motorway become blocked. WAG believes future developments should maintain this overflow capability. Junction 14 of the M5 is already over capacity. The proposed new AGP’s adjoining Junctions 13 & 12 provide direct access to the motorway network. The Whitminster AGP provides access to the existing Stonehouse rail station and the Stroud Water rail station re-opening supported by Stroud District Council and Stroud’s MP, Siobhan Baillie, and the local community. Both Stonehouse rail stations are easily accessible by cycle (including canals network), public transport supported by Stagecoach and road.
- 1.29 Assessment of AGPs should be influenced heavily by the net sustainability effects of their respective locations as the *‘benefits relating to these issues are likely to be outweighed by the increased need to travel in the plan area’*. AGPs should ideally be sited as near as possible to the major employment regions to minimise commuting, recognising the limitations in public transport and access to M5 junctions.

New Growth Points

The major conclusion from the spatial assessment was that probably three separate AGPs would be required to help achieve the increased total housing target as part of a hybrid solution. The 2019 Local Plan consultation detailed several AGPs (including PS37) and this latest 2020 consultation introduces two more. All the proposed AGPs, which have been consulted upon individually, will need to be finally compared to determine their relative sustainability attributes before being sent out for final consultation in the 2021 Local Plan. WAG has reviewed the site assessments for the two new AGP submissions contained in the 2020 SA and would like to bring to your attention the following points which demonstrates that PS37 is a far less sustainable AGP site than others:

- Further from the main centres of employment and the engine room of Stroud, distance to M5 junctions and a higher dependency on commuting journey miles (SA2).

Note – Area 49 (PS37) is calculated to have 22088 jobs within 45 mins and a **low** number of jobs are accessed via public transport vs 92059 and **high** jobs access for area 41 (PGP 1 and 2).

- PS37 is made up of predominantly Grade 2 agricultural land, the Best and Most Versatile Land in the district (NPPF para 170). BMV land is extremely scarce in the Stroud District. The Promoters independent soil survey should be removed from the local plan evidence as the report has been brought into question. The Agricultural Land Classification remains at Grade 2 as set out by Natural England.
- The proposed development will coalesce the hamlets and villages in the Parish, as well as Cam & Dursley. It would essentially be an urban extension beyond the parish boundaries of Cam. (SA8)
- Surface walk finds alone confirm the likely presence of at least one and possibly more Roman buildings on the PS37 site. Gloucestershire County Council Heritage Team are aware of the significant sensitivity of the site (SA9).
- The topography of proposed site PS37 being circa 25 feet lower than the M5 (which runs the full length of the site), bisected by the rail line (raised and ground level) and 40 foot beneath the A4135 crossing over the M5 results in the proposed site having acoustic and pollution issues, as identified in the Proposers evidence which does not have a resolution. Other proposed AGPs by comparison are further from the M5 and the railway network or the M5 runs through a cutting to provide natural acoustic shielding etc (SA5).
- Close proximity to these major transport lines coupled with the highest commuter mileage option produces the most undesirable air quality outcome (SA10)
- The same topographical issues result in the PS37 region, including Cambridge and Slimbridge villages being susceptible to surface water flooding. Furthermore, the inadequate desktop consultation failed to mention this or the recent attempts at reducing sewage and surface flooding undertaken by Gloucestershire County Council and Severn Trent Water which have only partially reduced the current threat. Given the very high-water table, suggestions that SUDs on PS37 can solve the surface water flooding problem without inundating existing settlements is wishful thinking (SA12).

- The Slimbridge Parish and proposed site the proposed site PS37 in particular falls entirely within a Drinking Water Safeguarding Zone, as opposed to being near to one.
- Although it was not raised in the consultation SA, Assessment Area 49 of the ‘Strategic Growth Option Report’ also confirmed the entire site will require sterilisation of mineral resources prior to development.
- The numerous infrastructure constraints including the high-pressure gas pipeline which the HSE states “No Build” and the Proposer’s plan not to move results in proposed PS37 site being unviable and undeliverable.

WAG is of the opinion that many of these constraints and issues were not identified and assessed adequately during the SA and throughout the rest of the local plan process.

WAG is happy to assist in formulating the update to the SA, if required, prior to formal issue of the final document. The evidence if assessed robustly will demonstrate that proposed site PS37 is unsustainable, not viable or deliverable.

SA Conclusions

- 1.77 WAG supports a hybrid approach to the spatial strategy is probably the optimum sustainable option which could achieve the target housing numbers if the Government implements the requirement to increase the minimum housing requirement. However, we understand the methodology will be changed as a result of the recent whitepaper consultation.

Note – The current plan is focused on excessive development in the south of the Stroud district. A local plan that is reliant on the current proposed draft local plan will lead to over-supply, land banking for many years and a failure to achieve the target housing delivery rate and the Local Plan.

- 1.79 AGPs situated on the major link roads in close proximity to urban settlements of Stroud / Stonehouse and Gloucester are more self-contained than those further afield (such as proposed site PS37) and are more easily accessible to employment via transport routes as well as the engine room of Stroud. More distant AGPs provide weaker access to jobs leading to increased commuter road miles.
- 1.81 From the evidence presented there are clear sustainability benefits if AGPs at Moreton Valence/Hardwicke and Whitminster are included in the local plan.
- 1.82 WAG supports larger scale AGP development at C1 (A38) in the North of the District and/or C2 (A419) as the evidence demonstrates these are more sustainable than an AGP at C3 (A4135). Spreading the load across the District and closer to employment.

Additional WAG Conclusions

The addition of new AGPs provides SDC with greater flexibility to select the most suitable, sustainable, deliverable, and viable sites based around an unbiased SA assessment, to achieve the target housing numbers. Both new proposed AGP sites are supported by experienced developers with a proven track record.

Specifically, regarding the important CN2030 initiative, proposed site PS37 is less sustainable than the additional two AGPs recently submitted and assessed.

Overall, proposed site PS37 was found to be significantly less sustainable, when all the SA factors were applied equally to the full range of proposed AGPs. These SA factors making PS37 less sustainable are as follows:

- Increased commuting journey miles
- Landscape impact
- High quality agricultural land
- Infrastructure constraints (inc. M5, A4135, A38, rail network, gas pipeline)
- Coalescence in the Slimbridge Parish and with Cam and Dursley
- Archaeological sensitivity
- Acoustics
- Air quality
- Flood risk
- Water quality

These factors are additional to SDC's own analysis which concluded AGPs situated on the major link roads in close proximity to larger settlements of Stroud/Stonehouse and Gloucester are more self-contained than those further afield (PS37). More distant AGPs provide weaker access to jobs leading to increased commuter road miles. There are clear benefits from providing AGPs at Moreton Valence/Hardwicke and Whitminster. WAG agrees that a large scale AGP development at C1 (A38) and/or C2 (A419) are more sustainable than an AGP at C3 (A4135).

Submitted by Wisloe Action Group on 16/12/2020

The Wisloe Action Group was formed to help represent our community's views in response to Stroud District Council's Draft Local Plan public consultation process. Local people are deeply concerned about Stroud District Council's proposals in their draft Local Plan for a so called 'growth point' in the Slimbridge Parish. Stroud District Council and the developers jointly refer to the site as Wisloe Green, a new "Garden Village", which joins Cambridge, Gossington and Slimbridge together with Cam and Dursley. A significant proportion of the community have been actively engaged throughout the consultation process and will continue to support WAG to work towards the delivery of a sound Local Plan with proposed site PS37 removed.



@Wisloe



@wisloeaaction

wisloeaaction@gmail.com