

DJPS/18-02180

Local Plan Review  
The Planning Strategy Team  
Stroud District Council  
Ebley Mill  
Stroud  
GL5 4UB

Second Floor  
21 Prince Street  
Bristol BS1 4PH

info@rapleys.com  
rapleys.com

LONDON  
BIRMINGHAM  
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MANCHESTER

18<sup>th</sup> January 2019

Dear Sir / Madam

Consultation on Stroud Local Plan Review Emerging Strategy Paper (November 2018)

I am writing on behalf of my client, Crest Nicholson Strategic Projects ('Crest'), to provide a formal response to the consultation on the Emerging Strategy Paper that has been prepared in respect of the Local Plan Review. They have been prepared in support of the extant allocations for Hunts Grove and the Hunts Grove Extension.

### Context

#### Hunts Grove

The Stroud District Local Plan 2005 was adopted in November 2005 and covered the period between 1991 and 2011. Policy HN1 (MU1) allocated Land East of the A38 at Colethrop Farm ('Hunts Grove') for a residential-led mixed-use development with an indicative capacity of 1,500 dwellings.

Outline planning permission (S.06/1429/OUT) was granted by the Secretary of State on 2 June 2008 for 1,750 dwellings, a Neighbourhood Centre (including primary school parking and floorspace within Use Classes A1, A2, A3, A4, A5, C2, C3, D1, D2 and B1), 5.75 hectares of employment land within Use Classes B1, B2 and B8, recreational open space, sports/play facilities, allotments, pumping station, new accesses into Waterwells, remodelling of land for Junction 12 improvements, noise bund and fencing along M5, diversion of footpath BH9, demolition of Colethrop Farm, and on/off-site infrastructure. There have since been two Section 73 applications (S.09/1692/VAR and S.15/1498/VAR) to vary elements of the permission.

The first reserved matters approval was granted in December 2009 and work commenced on site in 2010. There have since been a number of subsequent reserved matters approvals and delivery of the site is ongoing.

#### Hunts Grove Extension

The 2005 Local Plan was superseded by the Stroud District Local Plan which was adopted in November 2015 and covers the period between 2006 and 2031. Policy SA4 of the Local Plan allocates the land to the south of Haresfield Lane for a 750 dwelling extension to the main Hunts Grove site. However, the policy relates to both areas and sets out requirements for the new community as a whole.

Crest has an option over the majority of the land within the Hunts Grove Extension and is in the process of preparing an outline planning application which they intend to consult the Council and local community on in Spring 2019 for submission in Autumn 2019.

Emerging Strategy Paper

Below are our responses to those questions of relevance to Hunts Grove and the Hunts Grove Extension.

Question 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?

Page 21 of the Emerging Strategy includes a list of items that the Emerging Strategy will seek to deliver in respect of local green spaces and community facilities. One of the items is:

"a set of standards for local open space, sport and recreation facility provision, to guide future development".

Crest strongly support the need for a set of standards as it not only ensures that new development is supported by sufficient open space and sports provision, but also provides developers with certainty as to the level of provision that will be required when bringing forward a site. However, initial master planning work undertaken on the Hunts Grove Extension site has identified a potential drafting error in the standards contained within the adopted Local Plan. It is essential that this issue is remedied.

The open space standards in the current Local Plan are set out in Policy ES 15 (Provision of Outdoor Play Space) and are set out in the table below.

Table 1: Standards from Policy ES 15

Category	Requirement per 1,000 Population
Youth and Adult Facilities, including Playing Pitches	1.6 ha (of which 1.2ha to be provided as Playing Pitches)
Equipped Play Space of Children and Young People	0.2 ha to 0.3 ha
Local Area of Play (LAP) / Local Equipped Area of Play (LEAP) / Neighbourhood Equipped Area of Play (NEAP)	0.4ha to 0.5 ha

In contrast the standards in the Fields in Trust (FIT) document Guidance for Outdoor Sport and Play: Beyond the Six Acres Standard (2015) are as set out below.

Table 2: Standards from Guidance for Outdoor Sport and Play: Beyond the Six Acres Standard

Category	Requirement per 1,000 Population
Outdoor Sport, including Playing Pitches	1.6 ha (of which 1.2ha to be provided as Playing Pitches)

Category	Requirement per 1,000 Population
Equipped / Designated Play Areas	0.25 ha
Other Outdoor Provision	0.3 ha

The key issue with the current Local Plan standards is that two of the categories are for the same type of play provision (equipped play space and LAPs / LEAPs / NEAPs). Compliance with the policy would result in 0.6 ha to 0.8 ha of equipped play space being provided per 1,000 population. This is significantly in excess of the FIT requirement (0.25 ha per 1,000 population) and is clearly a drafting error. The FIT standard suggests that the LAP / LEAP / NEAP requirement should actually read as 'Other Outdoor Provision'. We therefore recommend that the policy is amended as set out below.

Table 3: Proposed Policy Wording

Category	Requirement per 1,000 Population
Youth and Adult Facilities, including Playing Pitches	1.6 ha (of which 1.2ha to be provided as Playing Pitches)
Equipped Play Space of Children and Young People	0.2 ha to 0.3 ha
Other Outdoor Provision	0.25ha to 0.35ha

Question 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?

Crest do not wish to comment on the emerging growth strategy itself, but would like to raise an issue in respect of the map at page 33 of the consultation document.

The map highlights 'Emerging Strategic Locations for Future Growth' in green and outlines 'Potential Sites for Future Growth' in red. While we have no objection to the use of these designations for new allocations that are being considered it is inappropriate to use them in respect of existing allocations from the adopted Local Plan (e.g. the Hunts Grove Extension). The current wording could lead to confusion as it could incorrectly be interpreted as meaning that status of the existing allocations has not yet been determined. We therefore recommend amending the notations on the map to clearly distinguish between adopted and emerging allocations.

Question 5.0a: Do you support the proposed mini-visions for your area(s)?

Crest strongly support the mini-vision for the Gloucester Fringe, in particularly the following reference:

“Hunts Grove will grow into a sustainable new community with a strong sense of identity, served by its own “village centre” and providing easy and convenient access to nearby jobs.”

Question 5.1a: Assuming some growth is desirable, have we identified the best site(s) at each town and village?

Crest do not wish to comment on the new allocations proposed in this section, but would like to make the following points in respect of page 76 (The Gloucester Fringe – Potential Sites – Hardwicke):

- As set out in our response to Question 4.2a it is inappropriate to refer to existing allocations from the adopted Local Plan as ‘Potential Sites for Development’. They are committed allocations and the current wording and map notations could lead to confusion as to their status. Amendments need to be made in order to clearly distinguish between adopted and emerging allocations.
- The purple box on page 76 states that the Hunts Grove Extension will deliver “750 dwellings, community uses and open space”. In this respect it should be noted that the community uses that will serve the Hunts Grove Extension will be located within the area of the original allocation. For reasons such as this it is recommended that Policy SA4 from the adopted Local Plan is replicated in the Local Plan Review. The policy covers the whole of the Hunts Grove area (original allocation and committed extension) and ensures that the development is being planned for in a cohesive manner, rather than as two separate but adjacent sites.

Question 6.1: Are there any other specific local studies that you believe are needed to inform the Local Plan review? Have you any advice on the scope or content of any of these studies?

The list of background studies that will be prepared to support the Local Plan Review includes an Infrastructure Delivery Plan. As is to be expected this document will be based on evidence provided by numerous organisations and stakeholders. In this respect it is important for the Council to ensure that the evidence is subject to critical review in order to ensure that it is robust. This is a requirement of the National Planning Policy Framework (NPPF) which requires plans to be ‘justified’, one of the four tests of soundness for Local Plans. Furthermore, requirements for unwarranted levels of infrastructure would likely result in developments experiencing viability issues that could impact the delivery of desired elements (e.g. affordable housing provision) or prevent them from coming forward.

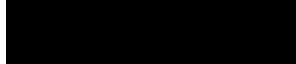
In terms of a specific example we have significant concerns with the School Places Strategy 2018 – 2023 (SPS) that has been prepared by Gloucestershire County Council (GCC) and which sets out the number of pupils that are likely to be generated by new developments. The flaws with the SPS are set out in detail in a letter that Rapleys sent for and on behalf of Crest to GCC on 21 November 2018 and which is included at Appendix 1. We strongly urge the Council to consider the content of the letter and ask GCC to undertake a robust survey and amend the SPS in accordance with the recommendations set out within.

I trust that the above is clear. However, please do not hesitate to contact me should you wish to discuss further.

Yours sincerely,



  
MA (Hons) MA MRTPI  
Associate - Town Planning



Appendix 01

# 190118 STROUD LOCAL PLAN REVIEW REPRESENTATIONS

DJPS/18-02180

Second Floor  
21 Prince Street  
Bristol BS1 4PH0170 777 6262  
info@rapleys.com  
rapleys.com21<sup>st</sup> November 2018

Dear Sir / Madam

**Consultation on Draft School Places Strategy 2018 - 2023**

I am writing on behalf of my client, Crest Nicholson Strategic Projects, to provide a formal response to the consultation on the draft School Places Strategy<sup>1</sup>.

While the Strategy is not strictly a planning document it is of particular relevance to the house building industry as we understand the conclusions on the number of pupils generated by new developments will inform the forthcoming update of Gloucestershire County Council's Local Developers Guide. The final approved version of the Strategy will therefore be material evidence underpinning future Council requests for planning obligations. This role is acknowledged on page 5 of the Education & Skills Funding Agency's 'Guide to forecasting pupil numbers in school place planning' (July 2017) which states that, amongst other things, robust forecasts are used to:

*"agree investment from other services and housing developers for infrastructure projects, including new towns and housing developments through Section 105/Community Infrastructure Levy (CIL) negotiations".*

On this basis it is essential that the pupil yield figures set out in the Strategy are based on credible evidence and formulated in accordance with best practice guidance. We have therefore reviewed both the Strategy and the key supporting evidence document. Our comments are set out below in the following sections.

1. The Consultation Process
2. Pupil Product Ratio Study (Cognisant Research)
3. Draft School Places Strategy 2018-2023 (Gloucestershire County Council - August 2018)

This is followed by section summarising our conclusions and setting out recommendations to the Council. Our comments provided as part of this consultation should be read without prejudice to any further responses made by my client in respect of any future update to the Gloucestershire County Council Local Developers Guide or planning application.

**1. The Consultation Process**

Crest Nicholson Strategic Projects recognise the important role that the document has to play in ensuring that new development is accompanied by the commensurate level of educational infrastructure and welcome

<sup>1</sup> Referred to as 'the Strategy' within this representation.



the opportunity to comment on the Strategy before it is finalised. However, as previously expressed to the Council in writing we are concerned that the process has not been transparent and that there is insufficient time between the end of the consultation period and the date of the committee at which approval of the Strategy will be sought.

The key points being:

- The Pupil Product Ratio Study<sup>2</sup> is the key piece of evidence informing the Council's decision to significantly increase the pupil yield figures that will be applied to new developments. As such the robustness of the Study is central to the soundness of Strategy. However, it is not referred to by name in the Strategy, included as an appendix nor available or signposted on the consultation page of the Council's website. A number of respondents will therefore not have had an opportunity to review the Study when preparing their responses.
- There is only 2 weeks between the end of the consultation on 21<sup>st</sup> November and the publication of the papers for the meeting of the Cabinet on 12<sup>th</sup> December. This is unlikely to be sufficient time to review the responses that have been received, consider whether any changes are required to the strategy and prepare the report for committee.

In conclusion, the above issues mean that the process that has been undertaken does not accord with the guidance in the Education & Skills Funding Agency's 'Guide to forecasting pupil numbers in school place planning'. On page 22 it states:

*"It is important that your forecasts are transparent and subject to scrutiny, giving local decision-makers as well as the DfE confidence to act."*

## **2. Pupil Product Ratio Study**

As set out above the Pupil Product Ratio Study (the Study<sup>2</sup>) is the key piece of evidence informing Council's decision to significantly increase the pupil yield figures that will be applied to new developments. We have reviewed the Study and have a number of significant concerns in respect of the approach that has been taken and the conclusions that have been reached.

The Study uses the data collected from the surveys of two developments within Gloucestershire to generate per dwelling Pupil Product Ratios (PPRs) for the different school classifications (pre-school, primary school, secondary school and post-16). The developments are:

- GCHQ (866 dwellings) – Cheltenham Borough Council
- Kingsway (3,337 dwellings) – Gloucester City Council

The process that was followed to generate the PPRs is summarised below:

- The survey data from both developments was analysed to establish whether the responses reflected the actual housing mix of the example developments (e.g. if 1 bedroom dwellings comprise 2% of the development, then ideally 2% of responses should be from 1 bedroom dwellings). Where the number of responses received was not proportional to the housing mix weighting was then applied to make the overall results more representative.
- The mean Child Product Ratio (CPR) per dwelling for both developments was calculated (0.74 children per dwelling for GCHQ and 1.22 children for Kingsway) and used to generate a blended

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<sup>2</sup> Referred to as 'the Study' within this representation.

- The mean CPR was then broken down across the different school classifications in order to establish Pupil Product Ratios (PPR) per dwelling for both developments and 'Gloucestershire'. The results are set out in the table below.

**Table 1: Pupil Product Ratios**

	GCHQ	Kingsway	Gloucestershire
Pre-School Children per dwelling	0.20	0.31	0.30
Primary School Children per dwelling	0.28	0.59	0.45
Secondary School Children per dwelling	0.14	0.23	0.24
Post-16 Children per dwelling	0.05	0.09	0.11

We have no fundamental concern with the methodology that has been used to establish the CPR's and PPR's when looking specifically at the GCHQ and Kingsway developments. However, as set out below using them to create a blended 'Gloucestershire' figure that forms the basis of the pupil yield figures that will be applied to new developments is inappropriate.

### Surveyed Developments

The Study is based solely on surveys of GCHQ and Kingsway, which are located on the fringes of Cheltenham and Gloucester respectively. The decision to survey only two developments is problematic for the following reasons.

Firstly, Gloucestershire contains six Local Planning Authorities (LPA) which vary greatly in terms of geography and demographics. These variances mean that it is highly unlikely that the pupil yields from developments on the fringes of two of the major settlements in the County are representative of developments elsewhere. Furthermore, less than half of the 24,772 dwellings that are allocated within the County<sup>3</sup> fall within the Joint Core Strategy area (Cheltenham, Gloucester and Tewksbury) where both developments are situated. It cannot therefore be argued that developments have been selected as they are in the area where the majority of growth is being directed.

Secondly, a survey of just two developments is too small a sample from which to generate robust and representative pupil yield figures over a county wide area. Should either of the developments be anomalous in terms of pupil generation then the blended CPRs and PPRs will be skewed significantly and result in pupil yield figures that are unrepresentative of the majority of new developments within Gloucestershire. For example, the primary school PPR for GCHQ is 0.28 pupils per dwelling which is identical to the current pupil yield figure in Local Development Guide, while the primary school PPR for Kingsway is over twice as high at 0.59 pupils per dwelling and results in the blended figure for Gloucestershire of 0.45 pupils per dwelling. It could be that GCHQ and Kingsway represent both ends of the spectrum in terms of pupil generation and that the blended PPR figure is therefore a reasonable average. However, it is just as possible that one of the developments is a fair representation of developments across the County, while the other is completely anomalous and skews

<sup>3</sup> Page 27 of the Strategy.





developments to generate PPRs for Gloucestershire. However, both developments are in excess of 350 dwellings and, as such, there is no evidence to indicate that pupil yields are different in developments smaller than 350 dwellings.

Secondly, as set out in the table below there are differences between the PPRs in the Study and the yields proposed in the Strategy. While the differences are relatively minor, with the exception of Post-16 children, no explanation has been given as to the reasoning for departing from the PPR figures in the Study.

**Table 3: Comparison between PPRs and Proposed Pupil Yields**

	Gloucestershire PPR	Proposed Pupil Yield (<350 dwellings)	Proposed Pupil Yield (>350 dwellings)
Pre-School Children per dwelling	0.30	0.23	0.26
Primary School Children per dwelling	0.45	0.37	0.42
Secondary School Children per dwelling	0.24	0.19	0.21
Post-16 Children per dwelling	0.11	0.1	0.1

Thirdly, page 19 of the Education & Skills Funding Agency's 'Guide to forecasting pupil numbers in school place planning' lists various elements of good practice for pupil forecasting, including a suggestion to:

*"work with neighbouring authorities as much as possible to validate any factors you use".*

In this respect there is no evidence of collaboration with neighbouring authorities. This is potentially a significant issue as collaborating with neighbouring authorities provides an important sense check exercise, which is particularly important in situations when considering significant changes to yields that have been used for some time. As can be seen from the table below the proposed pupil yields for primary schools (0.37 and 0.42 pupils per dwelling) are markedly in excess of those in neighbouring authorities. It would therefore be worth establishing why this is the case and if it is justified.

**Table 4: Pupil Yields in Neighbouring Authorities**

	Pre-School Children per dwelling	Primary School Children per dwelling	Secondary School Children per dwelling	Post-16 Children per dwelling
Herefordshire <sup>5</sup>	0.011 to 0.034	0.093 to 0.267	0.059 to 0.228	0.005
Worcestershire <sup>6</sup>	Data Not Available	0.196	0.14	Data Not Available

<sup>5</sup> Planning Obligations Supplementary Planning Document (April 2008)

<sup>6</sup> Planning Obligations for Education in Worcestershire (April 2018)



