

ON BEHALF OF REDROW HOMES (SW) LTD

**COUNCIL'S PRE-SUBMISSION DRAFT LOCAL
PLAN**

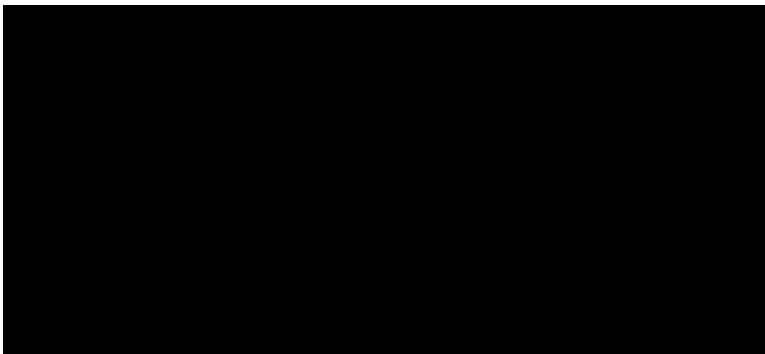
**IN RESPECT TO LAND NORTH OF HYDE
LANE, WHITMINSTER**

July 2021

ON BEHALF OF REDROW HOMES (SW) LTD

**REPRESENTATIONS TO STROUD DISTRICT COUNCIL'S PRE-SUBMISSION DRAFT
LOCAL PLAN**

IN RESPECT TO LAND NORTH OF HYDE LANE, WHITMINSTER



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1.0 INTRODUCTION

1.1 On behalf of Redrow Homes (SW) Ltd and the landowners, Grass Roots Planning have been instructed to prepare and submit representations to Stroud District Council's Pre-Submission Local Plan (Regulation 19) consultation, currently taking place until the 21st July 2021. This is with particular reference to land north of Hyde Lane, Whitminster, which is being promoted by Redrow Homes for primarily residential development.

1.2 This document sets out our concerns to the emerging Stroud Local Plan and the strategy it contains. The focus of these concerns relates to the fact that the strategy relies too heavily on strategic-scale sites, with those selected not underpinned by robust evidence to demonstrate why they are the most sustainable and viable options to accommodate housing growth. Our concerns also remain that the reliance on these sites will result in the council being unable to be demonstrated a five-year housing land supply (5YHLS) in the early years of the plan.

1.3 As part of this document, we will set out how we consider the emerging plan fares when considered against the tests of soundness that are set out in paragraph 35 of the NPPF (July 2021) which are as follows:

- a) **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.4 During the previous stage of the consultation (the 'Additional Housing Options' consultation (AHO)), we were pleased to see Whitminster being considered as an area for strategic-scale growth. However, despite it being an obvious location for sustainable development (as we will go on to discuss), we are disappointed to note that the emerging Local Plan does not include this location as an option for either housing or mixed-use development. We remain of

the opinion that the allocation of land in this location would create a more viable source of supply when compared to the more flawed strategic options such as Sharpness and Wisloe.

1.5 We are specifically promoting a site for future allocation in the Local Plan at land north of Hyde Lane, Whitminster (the site) to provide circa 200 homes, a retail unit and landscaping / open space. This could provide a suitable replacement site if existing proposed allocations are found to be unsound, or deliver a broader portfolio of sites if required, or housing numbers need to be increased across the district.

1.6 The land at Whitminster and the proposals for it are set out in the accompanying documents listed below. In addition, a series of technical assessments have been undertaken in support of the development proposed and to inform the masterplan for land north of Charfield Road and these should be read in conjunction with this statement:

- **Appendix A** – Site Location Plan
- **Appendix B** – Site Access, Junction Visibility Splays, Pedestrian Refuge and Vehicle Refuse Plans
- **Appendix C** – Ecological Appraisal
- **Appendix D** – Walking & Cycling Isochrones
- **Appendix E** – Initial Landscape Baseline Work including landscape-led constraints plan
- **Appendix F** – Heritage Assessment
- **Appendix G** – Flood Risk & Drainage Note
- **Appendix H** – Previous Representations to the ‘Additional Housing Options’ Consultation (December 2020)

1.7 We have previously submitted representations on behalf of Redrow Homes to the ‘Additional Housing Options’ consultation undertaken in January 2021 which included technical work to demonstrate the site’s deliverability. However, having reviewed the latest evidence and documents produced by the Council it does not appear that any consideration has been given to this alternative site and the evidence presented at that time; therefore, we are concerned over the lack of an iterative process in this regard which we will go onto discuss in more detail within this statement.

1.8 We note that during both the Environment Committee & the full Council meeting, motions were put forward to remove the strategic allocation at Wisloe and replace this with Moreton Valence. This appeared to be voted in favour of but then a second vote was undertaken to publish the Plan as agreed without this amendment. The minutes of this meeting are not

particularly clear and therefore there appears to be a lack of transparency in this decision-making process. Both strategic allocations at Wisloe and Sharpness remain within the Pre-Submission Local Plan, both of which we have serious concerns over as we have set out within our previous representations and will expand upon in this statement.

1.9 The overreliance on strategic scale sites will have an impact on the delivery of homes within the earlier stages of the plan as we will go on to set out, however, given the questions raised over their commercial attractiveness and viability, there is also concern as to whether they will deliver the scale of housing currently anticipated at all. A broader and more diverse portfolio of land should be allocated, of varying sizes, to deliver homes and other development over the next five years and beyond; this should include allocating land at settlements such as Whitminster to support the existing transport corridor which can be made more sustainable through much more limited investment compared to allocations such as Sharpness.

1.10 Our evidence is set out in the following sections:

- **Section 2** – Housing Requirement
- **Section 3** – Concerns over Specific Allocations
- **Section 4** – The impact on Five-Year Housing Land Supply
- **Section 5** – Land north of Hyde Lane, Whitminster
- **Section 6** – Conclusions

2.0 HOUSING REQUIREMENT

- 2.1 During the previous stage of consultation relating to the Additional Housing Options (AHO) paper, it was noted that the Ministry for Housing, Communities and Local Government (MHCLG) were intending to make changes to the Standard Method for Calculating Housing Need ('the standard method'), which would have resulted in a higher annual housing need figure of 786 per annum (15,720 over the 20-year plan period). We commended SDC for taking this positive approach to housing delivery.
- 2.2 However, we note that MHCLG has now abandoned these plans and therefore SDC have reverted back to the original housing requirement of 630 dwellings per annum (12,600), with additional provision to meet Gloucester's needs.
- 2.3 Paragraph 010 of the PPG recognises that *'the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates'*.
- 2.4 Therefore, we have reviewed whether there may be any other circumstances which warrant an increase in overall housing provision.
- 2.5 We have had regard to the Gloucestershire Local Housing Needs Assessment (LHNA) published in August 2020 which identifies that there is an overall unadjusted need for affordable housing of 424 dwellings per annum (8,480 homes over the plan period).
- 2.6 As set out in the Plan, this would require a high level of affordable housing to be provided across individual sites in order to achieve this level of development, which was demonstrated not to be viable, which is a reasonable assumption.
- 2.7 However, the current provision set out in the Plan would only deliver up to 3,810 affordable homes, and that relies on 30% affordable housing being delivered across every site, which it is clear from the viability evidence provided, that this won't be achievable. This is less than half of the unadjusted affordable need identified; as such, we question whether a higher level of housing should be delivered across Stroud (over and above the minimum required in the Standard Method) to address a greater level of affordable housing need as a potential option for the Plan.

3.0 THE SPATIAL STRATEGY

Overreliance on Strategic Scale Sites

3.1 Within our previous representations to the AHO Consultation (Appendix H), we set out our concerns in relation to the level of homes coming forward in on strategic-scale sites, which may require significant infrastructure to be delivered. Since this time, the housing requirement has reduced and the number of homes on some of the strategic sites has increased. As such, the table is now as follows:

Strategic sites ▼	Number of dwellings at each
Cam North West	900
Cam North East Extension	180
South of Hardwicke	1,350
Hunts Grove Extension	750
Sharpness Docks	300
Sharpness	2,400 (5,000 by 2050)
Stonehouse North West	700
Wisloe	1,500
Local sites at smaller settlements ►	985 (cumulative)
Total	At least 9,065

Figure 1. Extract of Proposed Housing Delivery on Strategic Sites

3.2 This equates to 8,080 dwellings, equivalent to 64% of the total housing requirement of 12,600 homes, 52% of the total number of dwellings anticipated to come forward (15,555 homes once existing commitments are taken into account, which incidentally also rely on strategic sites) and makes up 78% of the allocations and windfalls proposed as part of this new Local Plan (8,080 dwellings out of 10,340 coming forward). This also does not take into account the proposed allocation at Whaddon (2,500 dwellings) to meet the needs of Gloucester City. Therefore strategic scale sites represent an extremely high proportion of overall growth and in our views represents an acute over-reliance on such sites.

3.3 We have reiterated our table from paragraph 4.9 of our previous representations to highlight the stark difference with other authorities in the region which have a much lower proportion of strategic allocations, as shown below in table 1:

Table 1. Comparison of proportion of strategic-scale allocations in other authority areas

	Stroud Local Plan Review (2019 draft plan)	Cotswold District Council (2011 – 2031)	South Gloucestershire Council (2006 - 2027, adopted in 2013)	Tewkesbury, Cheltenham & Gloucester Joint Core Strategy
Housing Need	12,600	8,400	28,355	35,254
Total Supply	15,555	9,614	28,850	31,824
Number of dwellings from Strategic Allocations (over 500 units)	8,080	1,800	10,400	11,400
% of Total Supply	52%	19%	36%	36%

- 3.4 SDC are therefore relying far too heavily on strategic sites to come forward in a timely fashion to deliver the housing required, as well as ensuring that there is a robust 5YHLS throughout the plan period. Evidence to date has demonstrated that this is difficult to achieve, as we go onto discuss in the next section.
- 3.5 With consideration of the table above, it is clear that the number of strategic allocations proposed is significantly higher than nearby authorities. South Gloucestershire Council and the Tewkesbury, Cheltenham and Gloucester authorities whose strategic allocations make up 36% of their overall supply, far lower than Stroud's, have repeatedly been found unable to demonstrate a five-year housing land supply, primarily because of long lead-in times associated with larger strategic sites.
- 3.6 A broader portfolio of sites is required to achieve a balanced range of site sizes and types, which will allow development to come forward early on in the plan period, including the provision of affordable housing. Currently, we consider that the plan will fail to meet paragraph 60 of the NPPF (July 2021) which requires '*a sufficient amount and variety of land can come forward where it is needed*'.
- 3.7 Without the removal of some of the strategic sites (such as Sharpness and Wisloe, which we discuss in detail below), and their replacement with a more suitable range of site sizes, we consider that the strategy set out under policy CP2 of the emerging plan is unsound.

Concerns over Specific Allocations

Sharpness

- 3.8 We will not seek to repeat our concerns in full, but would direct the Council and the Inspector to paragraphs 4.26 – 4.37 of our representations to the AHO Consultation, which are available in Appendix H of this submission. We have further expanded on some specific points and evidence which has come to light since the previous representations were submitted.
- 3.9 As set out, our primary concern in relation to this site is its unsustainable location, and the potential infrastructure costs that are highly likely to be required in order to make it accessible, which in our view renders the proposals unviable and undeliverable. The starting point is to assess the existing sustainability credentials of the site, and then, if the site is unsustainable, whether there are reasonable and credible mitigation options to make it accessible in transport terms.
- 3.10 Our concerns are supported by Stagecoach and we have previously referenced their statements specifically within our representations, so we do not seek to repeat these again.
- 3.11 Aside from the fact that the site is an unsustainable settlement for strategic-scale development, we have concerns over the mitigation proposed and the reality of this providing a reasonable choice of alternative transport modes to the private car.

Transport

- 3.12 Since the previous submission, a range of documents have been published by the promoters which have been prepared by Stantec, including a document entitled '*Sharpness Vale – Mobility-as-a-Service and Express Coach Services*', which is a strategy, viability and funding appraisal (March 2021).
- 3.13 The document focuses heavily on 'Mobility as a Service' or 'MaaS', which essentially looks to the future and how changes in our working patterns and technology means that we are no longer reliant on more 'traditional' transport provision, such as bus services, and more like to focus on on-demand transport that groups riders together. MaaS is an app service which seeks to combine all available transport services within that area and provide the user with a 'joined-up' experience in taking public transport and other modes of sustainable travel. Second to this is the provision of a bespoke bus service with operator Zeelo, and a bespoke railway service.

3.14 Stantec's report states that the proposals are 'good value-for-money' for a subscription to a MaaS service, however, the comparison costs and take-up are related to very large cities, such as London, Gothenburg, Helsinki and Birmingham. These areas all have a very high concentration of people within a more limited geographical location that provides opportunities for significant patronage, compared to a very rural location such as Sharpness where there is no significant existing demand to underpin such a service and houses are unlikely to be delivered for at least 10 years. Put simply, it is unrealistic to expect sustainable transport providers such as Car Club, Uber, E-Scooters, etc. to set up a business where there is no business case to do so, due to a lack of demand – all MaaS does is collate the existing services which are extremely limited. Second to this, is that the comparison of costs again relate to large cities where wages are much higher when compared to a rural area of Gloucestershire, such as Sharpness and its hinterland. The costs cited would be relatively unaffordable for residents in this location based on local wages, particularly if the variety of transport options promised are not available. We do not consider that this presents a real 'value-for-money' option.

3.15 Further to this, we note that the documents state '*at present, the Sharpness Vale promoters have not formed a partnership with a MaaS operator, as it would make sense to do this once the commencement of the development is closer*'. Whilst we appreciate there are 'unknowns' relating to the development, this is concerning, particularly given that the infrastructure for the development needs to be planned for early in advance for it to work. This does not comply with the Garden City Principles which states that it should provide '*integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport*'. There is no commitment from the various transport providers of car club, electric scooters, etc., that this will be delivered at Sharpness nor is there any commitment to MaaS from the developers of the site.

3.16 As such, at the present time, it is highly likely that Sharpness would be reliant on the provision of the proposed Zeelo bus service and the railway service. On page 16 of the Stantec document, it noted that '*there will be a need to pump-prime the service at the outset*', however there is no commitment from the promoters that they would fund this nor is there any developer committing to this cost. There are serious concerns with this approach which are as follows:

- There is no existing demand or provision that can be synergised with – therefore any costs associated with developing a bus service in this location will be very expensive, and less relevant or attractive to an operator, given the remoteness of the location;

- This will cause a significant gap between cost and revenue particularly in the early stages of the development, and there is no clear vision for who will be funding this gap and who has committed to the guaranteed delivery of this service;
- There is some suggestion that households will pay a management fee towards the costs of public transport – this does not support the Garden Village principles of ‘land capture value for the whole community’ and there is no assessment of what that cost might be and whether it may affect viability and hence the delivery of policy compliant levels of affordable housing;
- The anticipated assumptions made on the modal share between buses and coaches is extremely high compared to even inner London when they anticipate only having a single choice of departure time and a single return time to one destination – this does not provide a real choice of transport options and the level of patronage will be far more limited; and
- Local bus enhancements are not costed at all.

3.17 Our view remains therefore that the costs of providing a sustainable transport solution for this site have not been rationally considered and will not result in realistic alternative transport options other than the private car.

3.18 The Infrastructure Delivery Plan (IDP) states that *‘consultation with GCC Highways highlighted the reliance on the PS36 New settlement at Sharpness providing a high level of trip internalisation. It is therefore vital that supporting infrastructure, such as shops and services, are provided in a timely fashion to minimise out-commuting and reduce pressure on the surrounding highway network’* (page 28). As such, it is concerning to note that the trip analysis relies on the local centre being delivered early on in the process and the impact on the highways network may be even more severe than anticipated. In our view, the alternative transport solutions offered are not realistic or credible options given the lack of commitment to pump-prime the services envisioned and the fact that revenue will be extremely low within at least the first 10 years of the delivery of housing in this location.

3.19 Whilst the Zeelo bespoke service is a good aspiration, it is not realistic and needs to be supported by that traditional service that links in with it and connects residents between smaller areas to allow accessibility for all. The service claims to ‘unashamedly target commuter traffic’ – what would be much simpler is to place development in locations which can more easily and readily be made sustainable, in close proximity to existing employment areas and facilities, such as Whitminster. Further to this, it does not consider the proportion of the population that may be less able and / or rely on public transport to get around on a day-to-day basis.

- 3.20 With respect to the railway line, we note that this is anticipated to be a 'bespoke service' too, yet there is limited to no evidence from Network Rail that they support the delivery of a new railway line in this location, contrary to the promoter's material. Whilst there has been an application for funding for a full business case, it remains to be seen what the actual costs of developing the railway line are, and whether the promoter is willing to fund it without it resulting in this being passed on to the cost of the individual, i.e. those buying homes in the future. At the current time therefore, we fail to see how it remains as a credible option for providing an alternative means of travel to the private car, as it has in no way been costed and the results of such a costing fed into a viability assessment. Therefore, the current strategy simply hopes for the best without any reliance on actual data and evidence.
- 3.21 This was noted in the Gloucestershire Rail Investment Strategy (March 2020) which states that *'whilst the reopening of the line could provide sustainable transport to Sharpness and enable significant growth in the area, analysis shows a very limited GVA impact for a very costly new piece of infrastructure. This was also reflected in the comments from Network Rail and GCC Highways'* (page 29). Whilst there is some reference to the Sharpness Branch, it is clear that the initiative is driven by the desire to 'support significant new development around Sharpness'. The introduction of the new line provides no benefit nor improves the service for the existing population, and only seeks to accommodate the new homes, thereby resulting in a significant cost benefit. This does not demonstrate deliverability of a sustainable location for growth.
- 3.22 An alternative would be to allocate land where infrastructure has already been costed and planned for, which development could seek to enhance and leverage off, or locate development where the need to travel to access employment and other facilities is not so acute.
- 3.23 In light of the above, we do not see how realistic and informed transport options have been put forward to ensure that there will be a realistic alternative to the private car once Sharpness begins to deliver housing. Our concerns are two-fold: first, that this will result in reliance on the private car which will in turn adversely effect air quality and CO2 emissions, meaning that the Strategy fails to meet the requirements of the Climate Change Act; and second, that this will result in viability and delivery issues for the site, resulting in a reduction in affordable housing or other infrastructure delivery.

Viability

3.24 Within our previous representations we noted some viability concerns over Sharpness set out within the Local Plan Viability Assessment (May 2021), the following has been noted:

- At both Wisloe and Sharpness premiums have been applied to the potential sales values to account for the fact that they will both follow the 'Garden Village' principles; it also relies on the proximity of Bristol as a market to justify these values. However, the fact remains that the location is not market tested and the values adopted are aspirational. They do not, for example, test a more conservative scenario such as values closer to those prevalent in the area. However, despite the increased premiums, there are still concerns with Sharpness as a viable option for development, with the Viability Assessment indicating that there are 'challenges' with this area (paragraph 12.88 of the assessment). These viability concerns must be given serious thought due to the level of affordable housing that is expected to be delivered here as a consequence of the overall scale of the development. If it does not achieve this, then the council's strategy for addressing affordable housing need becomes uncredible, even based on their acceptance that the full level of assessed need will not be met by the plan.
- Table 7.2 sets out the initial strategic infrastructure and mitigation costs for Sharpness, this was anticipated to be £61 million (averaging at £28,596 per qualifying household) in the May 2020 paper. Within the new paper (May 2021), this has suddenly decreased to £42 million therefore lowering it to £17k per dwelling, with no detailed explanation as to why this has occurred. Further to this, it does not provide any allowance for additional pump-prime funding for the first few years of the bus service required to make it a sustainable location for commuters.
- Paragraph 12.74 states *'the infrastructure cost for the Strategic Sites (as set out Chapter 7 above) is about £20,000/unit. On these sites, viability is constrained, with none of them being able to deliver 30% affordable housing and £20,000/unit.'* The results of this is that the Viability Assessment recommends that the Council engages with the owners of the Strategic Sites to determine whether this level of contribution can be sought.

3.25 In conclusion, the Council's own viability work highlights significant concerns in respect to the viability of these locations, even based on potentially unrealistic high sales values and the dramatic and unevicenced reduction in assessed infrastructure costs. The report requires that the owners of the Strategic Sites should provide detailed evidence to demonstrate that the

30% affordable housing requirement can be achieved alongside the costed infrastructure – to date, we can find no clear or concise report which describes this.

Agricultural Land Quality

3.26 Based on the provisional Agricultural Land Classification Maps from Natural England, the majority of Sharpness lies within Grade 3 agricultural land – it is unclear whether this is considered to be ‘Best and Most Versatile’. There is no evidence to confirm this but if the land is Grade 3a or above, this would result in a significant proportion of BMV land being removed, contrary to national guidelines. This is being determined at a stage where reasonable alternatives existing to provide the development necessary to meet the housing requirement over the plan period.

Transport

3.27 The Infrastructure Delivery Plan (IDP) March 2021 identifies on pages 26 – 28 the package of highway mitigation measures that will be required in response to the allocation of land at Berkeley, Sharpness Docks, Focus School, and the new settlement of Sharpness. The junction improvement schemes identified are set out in the table below, alongside the costs associated with delivering them (taken from the Traffic Forecasting Document) – unless they are considered unfeasible, then the reasoning for this is given instead.

Table 2. Highways Mitigation Required to support Sharpness

Conversion to signal control with flare extension on B4066 approach	A38 / B4066	£250k - £2.5m
	A38 / Breadstone	This will be addressed via the improvements to the A38 / B4066 junction. Mitigation to this junction is considered inappropriate due to the nature of the road.
Addition of Traffic Signals, with flaring provided on A38 southbound approach	A38 / B4066 Berkeley Road	£250k - £2.5m.
N/A	A38 / Stone	No highways improvements are proposed despite the fact that the junction would exceed capacity during the AM peak and large

		increases in southbound demand. It states that mitigation is unlikely to be appropriate due to the minor nature of the road.
Signalisation of existing three-arm give-way junction, with widening on Alkington Lane approach.	A38 / Alkington Lane	£250k - £2.5m. It should be noted that these mitigation measures would require land acquisition either side of Alkington Lane, as such, costs are likely to be the higher end of the spectrum and currently it is unknown if this mitigation is deliverable.
Limited widening on B4066 eastbound approach to existing roundabout	B4066 / Station Road	Low and very low cost schemes (likely to be under £250k)
Removal of existing hatch marking and potentially minor carriageway widening on northbound A38 approach	A38 / A4135	Low and very low cost schemes (likely to be under £250k)
N/A	A38 / Wick Road	No mitigation measures are proposed given the nature of Wick Road, despite it being assessed as exceeding capacity in the PM peak.
Introduction of traffic signal control	B4066 / Alkington Lane	£250k - £2.5m

3.28 This level of mitigation is required even assuming a high level of trips being internalised within the promoters' model, as highlighted by GCC and referenced in paragraph 3.18 of this statement. The IDP itself recognises that *'the proposed allocations as PS34 Sharpness Docks and PS36 New settlement at Sharpness have an issue of relative remoteness in public transport terms. This increases demand for private car usage'*, which calls into question whether the assumptions about high levels of internalisation are reasonable.

- 3.29 A simpler solution would be to allocate land that is more accessible, particularly in respect to employment opportunities, which is already on an existing transport corridor and where bus operators consider that a reasonable business case could be made for improving and extending the services in this location, that would avoid significant infrastructure funding being required. It is unclear at this stage whether the Highways Authority or Highways England would issue a holding direction in respect to the delivery of Sharpness until such mitigation has been secured and implemented; if they would, then that would add to the need to deliver most of these significant improvements upfront, thereby exacerbating the viability issues identified in respect to these sites and resulting in significant delays to the delivery of homes, failing to boost supply in the shorter-term.

Other Concerns

- 3.30 We have previously raised other concerns regarding the allocation of land at Sharpness, however we note in the IDP that it states *'the Sharpness Garden Village would also likely have significant recreational impacts on the designated sites. These impacts may go beyond those assessed within the existing Severn Estuary Recreation and Mitigation Strategy and further work is required to understand implications and to develop appropriate mitigation'* (page 94). Given that the Severn Estuary Recreation and Mitigation Strategy does not account for additional growth in this location, it is highly likely that further work will be required to update this plan to ensure recreational impacts do not breach environmental legislation. It is unclear whether this will result in further delays to the delivery of Sharpness without a mitigation strategy in place, and whether such mitigation would add to infrastructure costs.

Conclusions on Sharpness

- 3.31 As set out, we consider that the first step in the preparation of the plan should have been to assess the baseline situation of a site's location and whether it has the ability to accommodate significant development in terms of accessibility. In our view, Sharpness is not an appropriate location for significant growth given the adverse impact this would have on the highways network which already optimistically assumes high levels of internal trip generalisation – therefore, the full impact may not be realised.
- 3.32 This reflects the conclusions found during the previous Local Plan preparation where the site was dismissed, with the Council at the time stating: *'whilst Sharpness has the theoretical capacity to achieve this scale of development (and more), it is relatively remote from the main employment centres and primary facilities and services in the District, would require significant new infrastructure and has flood risk and landscape impact issues'* (page 22 of

CDF15 'Towards a Preferred Strategy, Pros and Cons of Potential Locations for Strategic Growth').

- 3.33 The transport mitigation set out for the site does not appear realistic, it has not been properly costed and the funding to deliver it thought through. We do not consider it to be a credible option for alternatives to the private car; development at Sharpness will simply exacerbate issues of commuting to Bristol and other key locations within the Stroud area. Further to this, it appears that the promoters of the site have not considered the development in a holistic manner by ensuring that all would be able to access public transport – it simply focuses on commuters and not those that may need to travel between smaller locations. It cannot meet the needs for those travelling to smaller destinations because there is no credible business case for local bus services in this location as Stagecoach have highlighted. This is a significant adverse issue against its allocation for the scale of development proposed.
- 3.34 Reliance is placed on a railway scheme which has no funding secured for its delivery and no full business case developed. Therefore, the costs of re-introducing the line are extremely unclear and it does not currently have the support of Network Rail, or any other rail operator in the area.
- 3.35 It would be far more logical to place development in a location where concentrations of employment opportunities already exist, key facilities are available and within transport corridors which are already, or can be made, sustainable through reasonable levels of investment. In comparison, land at Sharpness will rely heavily on pump-prime funding; government investment; and / or will result in individuals having to pay (i.e. through increased house prices, ongoing management fees or significant public transport fares). As such, we do not consider it to be a sound and reasonable location for development and instead land should be allocated at more sustainable settlements such as Whitminster (for strategic-scale development) and Kingswood (non-strategic development).

Wisloe

- 3.36 We set out our primary concerns regarding these allocations in paragraphs 4.1 – 4.25 of our representations to the AHO consultation earlier this year, a copy of which is available in Appendix H of this statement. Since that consultation stage was completed additional evidence has now been produced by the promoters (GCC and Ernest Cook Trust Ltd) of the allocation at Wisloe which forms part of the evidence base to the Local Plan; this covers matters in respect to agricultural land classification, ecology, heritage, highways, flood risk,

landscape and noise. Our comments are made below following a thorough review this information.

Agricultural Land Quality

- 3.37 After raising initial concerns in respect to this matter, on the evidence provided that the land is Grade 3B agricultural land, we can now accept that there would be no conflict with national planning policy in respect of this issue.

Highways

- 3.38 With respect to highways, the following infrastructure requirements are noted:

- A new bridge over the Railway line;
- New pedestrian / cycle link across the motorway, which would need to span over 6 lanes of motorway traffic and hard shoulders; and
- Public transport strategy options including the extension / diversion of services 60/61 into the development; provision of a new service; and provision of bus priority infrastructure.

- 3.39 It is unclear whether the promoters of the site have costed these pieces of infrastructure and whether they are incorporated into the viability appraisal work undertaken by HDH. Again there is the potential issue that Central Government investment and pump-priming funding will be required in order to make the proposals accessible and deliverable; without these significant pieces of infrastructure delivered it is clear that the proposals would not be sustainable in accessibility terms and given the need to offer future residents the realistic of travel options without the need for the private car.

- 3.40 It is also interesting to note that the highways assessment prepared in support of the allocation at Wisloe does not look at cumulative impacts on the network from additional trips generated by this site and the nearby allocations in Cam and there is no evidence to demonstrate that this will not cause significant adverse effects on the road network from the provision of over 3,000 dwellings in this general location. Given that the allocation of these sites will predominantly affect the same junctions, in our view it is important to establish whether any mitigation is required up front and whether this will have an impact on delivery in the front end of the plan period.

Noise

- 3.41 A noise assessment has now been undertaken by Acoustic Consultants Ltd on behalf of the promoters for Wisloe. This has identified serious noise concerns with the site, as the extracts below show which are taken from the noise reports prepared:

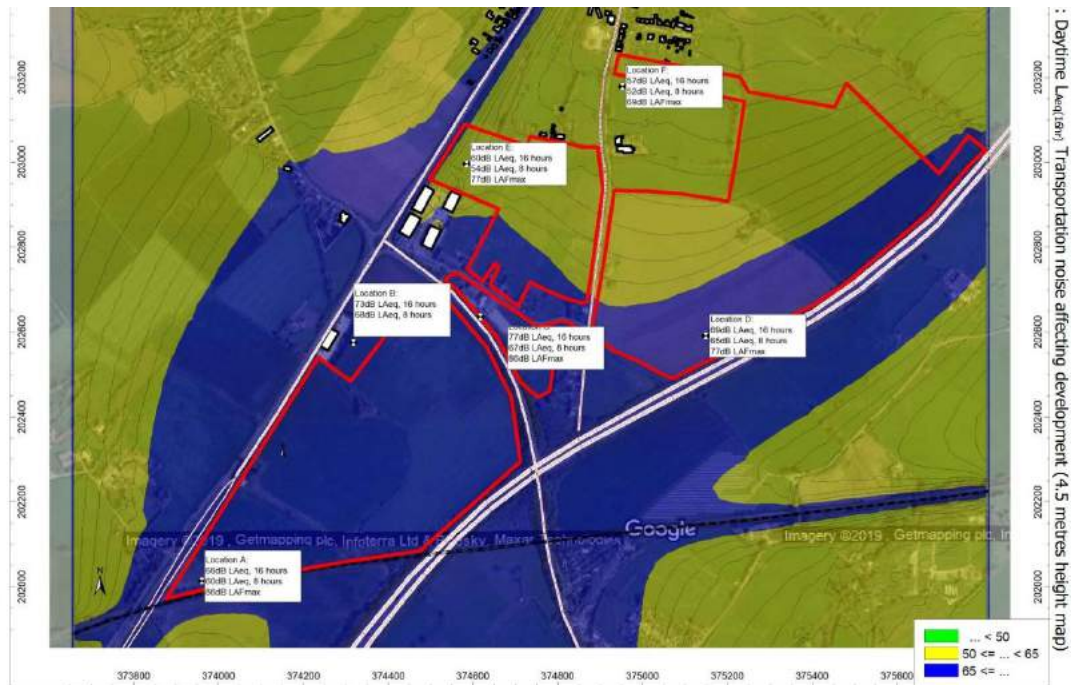


Figure 2. Baseline Noise Assessment results

- 3.42 As a result, the noise assessment recommends that windows would need to remain closed to resolve noise issues at the site. This in turn, can lead to either requirements to incorporate mechanical ventilation (and therefore an increased cost to the developer) or windows would have to be closed, resulting in overheating of a property and requirements to cool it. It is unclear whether this has been considered in the design and layout of the scheme.
- 3.43 Some consideration has been given to garden areas within the noise report but it appears no detailed layout has been prepared, which does not allow the assessors to adequately consider this issue.
- 3.44 As such, there remains a concern over the significant noise levels at the site which appear to sterilise a significant proportion of the land; we therefore question whether 1,500 dwellings are deliverable in this location without significantly adversely affecting the amenity of future residents.

Conclusions on Wisloe

- 3.45 Our previous concerns set out in our representations to the AHO consultation still remain, particularly the lack of a cumulative assessments on transport impacts and how noise will seriously inhibit the delivery of housing and make future amenity issues unavoidable. The additional technical evidence to date has not alleviated our concerns with respect to viability, deliverability and some technical aspects of the scheme.
- 3.46 This includes the initial baseline landscape work which identifies the key corridors to be retained and remain free from development – this evidence base, coupled with the other work undertaken, sterilises a large proportion of the site and we question whether 1,500 dwellings can actually be delivered at an appropriate density in this location. If 1,500 dwellings cannot be achieved we fail to see what the site would act as a sustainable, standalone Garden Village proposal.
- 3.47 In our view, the allocation of land at Wisloe should be removed and instead replaced with a mix of strategic-scale development supported by smaller sites elsewhere, such as in Whitminster. This will broaden the portfolio of the type of sites being put forward and provide growth in the southern part of the district, which has practically no development proposed to meet housing needs arising in that area.

4.0 THE IMPACT ON FIVE-YEAR HOUSING LAND SUPPLY

4.1 As set out within our representations to the Additional Housing Options Paper in January 2021 (a copy of which is available in Appendix H), we have serious concerns over the proportion of growth that is anticipated to come forward from strategic sites within the new Local Plan. This is set out in paragraphs 4.6 – 4.13 of our statement so we will not repeat our discussions in full; however, our primary concern is the ability for these sites to deliver homes early on in the plan period and the effect that this will have on five-year housing land supply (5YHLS). We have undertaken further investigation on this matter with respect to the Delivery & Trajectory set out in Section 7 of the Pre-Submission Local Plan, as well as the existing 5YHLS paper published in November 2020. This takes into account our concerns with the specific allocations raised in the previous section of this statement.

4.2 We have reviewed the most up-to-date 5YHLS paper which includes existing commitments and the remaining current Local Plan allocations which are yet to deliver homes (this does not make any allowance for future allocations such as those in the emerging plan coming forward). We note that the Council currently anticipate the following trajectory over the next 10 years without any new sites coming forward:

Year	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
Deliverable Supply	779	1,045	944	857	752	654	511	259	255	227

Figure 3. SDC's Estimates of Deliverable Sites between 2020 – 2030

4.3 It should be noted that the above figures already include the Hunts Grove Extension site and Sharpness Docks, both of which are allocations being carried forward from the previous plan, which highlights the fact that some sites in the area have taken circa 10 years since they were first earmarked for growth and over 6 years since they were formally allocated, with neither ready to deliver housing. The above figures do not make any allowance for the non-delivery of sites and assume that all commitments and allocations will be delivered.

4.4 Based on the above figures, we have calculated the rolling 5YHLS position below. This is calculated by adding up the anticipated delivery over five years (rolling forward each year) and dividing this by the annual requirement including a 5% buffer (e.g. for April 2022 add the number of homes coming forward through years 22/23 to 26/27 together (3,718 homes) and divide by 662 ($630 \times 5 = 3,150 + 5\% \text{ buffer} = 3,308 / 5 = 662$ homes per annum)):

Year	Five-Year Housing Land Supply Calculation
2020	6.6
2021	6.4
2022	5.6
2023	4.6
2024	3.7
2025	2.9

Figure 4. Estimates of Rolling 5YHLS Calculation based on existing commitments and allocations in the 2015 Plan

4.5 As such, by 2023, Stroud District Council would not be able to demonstrate a five-year housing land supply based on their existing commitments and allocations in the current Local Plan and therefore allocations within the new Local Plan need to be coming 'on stream' by this time, to plug the gap and ensure that there is an adequate supply of new homes.

4.6 We note the trajectory set out in Table 6 of Section 7 of the Pre-Submission Plan (extract shown below for ease of reference) aims to show how housing delivery will be front-loaded and a five-year land supply achieved throughout the early parts of the plan period as follows:

Source of housing supply	Projected delivery				Total supply
	2020 to 2025	2025 to 2030	2030 to 2035	2035 to 2040	
Commitments (2019)	3,840	755			4,595
Cam North East Extension		50	130		180
Cam North West	200	700			900
Hunts Grove Extension	166	550	34		750
Sharpness Docks	110	112	78		300
Sharpness new settlement		500	750	1,150	2,400
Stonehouse North West	100	375	225		700
South of Hardwicke		600	600	150	1,350
Wisloe new settlement	50	565	660	225	1,500
Local development sites	116	290	290	289	985
District Total	4,582	4,497	2,767	1,814	13,660
Small sites windfall	150	375	375	375	1,275

Figure 5. Extract of Table 6 showing anticipated delivery of housing in Stroud

4.7 We have analysed whether the trajectory is realistic based on the Lichfields 'Start to Finish' Paper: Second Edition, published in February 2020, which provides a useful analysis of timeframes for a different range of applications of varying sizes.

4.8 Lichfield’s analysis indicates the following in respect to timeframes:

Figure 4: Average timeframes from validation of first application to completion of the first dwelling



Figure 6. Extract of Lichfield’s ‘Start to Finish’ Paper: Second Edition (February 2020) showing average timeframes from validation of first application to completion of the first dwelling

4.9 Based on these factors, we have then assessed whether it is realistic for the strategic-scale allocations to come forward based on the trajectories set out by the Council.

Cam North-West

4.10 Cam North-West is an allocation for 900 dwellings. It is anticipated that 200 dwellings would be delivered in years 2020 – 2025 with a further 700 delivered in years 2025 – 2030. This is an average delivery of 40 units per year in years 1-5 of the Plan Period and 140 per annum in years 6 – 10.

4.11 A Scoping Request was submitted for an EIA development of up to 1,100 dwellings (Application Ref: 2020/0314/EIAS) on behalf of Persimmon and Robert Hitchens last year and it is anticipated that a hybrid application will be submitted imminently, including detailed planning permission for the first phases of the residential element of the scheme.

4.12 As such, given that an application is due imminently which will include detailed planning permission for a significant proportion of the site, Redrow consider that the trajectory is reasonable.

Cam North-East Extension

- 4.13 The Cam North-East Extension is allocated for 180 units. It is controlled by Persimmon and Robert Hitchins and no application has been submitted to date. However, the timeframes set out appear to be reasonable in light of the site's constraints and scale of the development proposed.

South of Hardwicke

- 4.14 Land at Hardwicke is allocated for 1,350 dwellings. It is currently anticipated that 600 dwellings will be delivered in years 2025 – 2030, with a further 600 dwellings in the following five years, after which delivery tails off.
- 4.15 Redrow Homes control the site (part freehold, with the balance of land under an option agreement) and the position statement prepared by RPS clearly sets out how the development will begin to delivery homes in years 5 – 10 of the plan period. A planning application will be submitted in Q4 of 2021 which will include detailed elements of the scheme and a dual outlet approach is proposed, which will ensure 120 homes per annum can be delivered. As such, we are comfortable in light of the evidence base submitted that the site is deliverable and will delivered quicker than the Lichfield evidence suggests because there is an evidenced timeframe for the submission of a detailed planning application and Redrow have confirmed that two outlets will be on site, each delivering 60 dwellings per annum.

Hunts Grove Extension

- 4.16 The allocation which constitutes an extension to Hunts Grove will deliver a net increase of 750 dwellings, in addition to the 1,750 that are already allocated. Based on the 'Start to Finish Paper', it would take circa 5 years to obtain approval for the additional land and to see the first homes being delivered. Therefore, it seems unlikely that these homes would be delivered between in years 2020 – 2025 based on this analysis alone and the fact there has been no application submitted to date.
- 4.17 Further to this, it is apparent that a significant proportion of the main Hunts Grove site will need to be built out prior to the additional land coming forward and an access provided to this land given its location on the periphery of the allocation.
- 4.18 According to the latest 5YHLS paper, 603 dwellings of the original 1,750 allocation have been completed, first recorded in April 2012 and therefore equating to an average of 67 per year.

We acknowledge that the level of delivery has increased to circa 120 homes per annum in the last two years and the number of outlets has increased to four more recently (Bellway Homes, DWH, Crest and Bovis), however, given that Crest also control the Hunts Grove extension site, it is highly likely that they will seek to build the majority of their land control out on the original allocation, before pursuing the new land.

- 4.19 It is therefore highly unlikely that homes will be delivered within five years on this extension site in light of the remaining homes to be completed on the original allocation and the time taken to obtain planning permission for a further 750 dwellings. As such, the trajectory should be shifted back to at least years 2025 – 2030, if not 2030 onwards given that it will take a further 9.6 years to build out the current Hunts Grove Allocation based on the recently elevated delivery rate of 120 dpa ($1,750-603/120 = 9.55$).

Sharpness Docks

- 4.20 As we have set out within this statement we have extensive concerns with the Sharpness New Settlement, which need to be addressed if the Plan is to be found sound. In our view this should mean the removal of this allocation and it instead should be replaced with other more suitable and sustainable allocations such as the land at Whitminster.
- 4.21 Notwithstanding this conclusion, we have also reviewed the likelihood of the trajectory being delivered as planned in respect to the current allocation at Sharpness Docks. Based on Lichfield's Start to Finish, it is anticipated to take circa 4 years from the validation of the application through to delivering the first home on site for a scheme of this size (300 dwellings). An outline application was submitted in April 2017 and is still pending determination (Application Ref: S.17/0798/OUT), with technical issues and comments still to address.
- 4.22 This indicates that the Lichfield's Start to Finish Paper is not wholly accurate (and doesn't purport to be because it is an average) and has demonstrated already the significant difficulty with obtaining permission on a brownfield site such as this one. Given the Conservation Area, Ecological and Listed Building constraints, and no doubt viability issues associated with the site, it is potentially unrealistic to expect RMs to be submitted and approved, with buildings demolished, contamination investigation undertaken, and 110 homes delivered within the next five years.
- 4.23 The Viability Assessment May 2021 paper states *'in taking this approach it remains necessary to be cautious about relying on the brownfield sites to deliver in the early years of the Plan,*

and the Council should only count on such sites (for example in the five-year housing land supply calculation) where it is confident the site will be forthcoming, for example there is a recent planning consent.'

- 4.24 The work in this paper also demonstrates that this site is not viable and therefore it is anticipated that a lower level of affordable housing delivery will occur here, if assessments haven't already been submitted.
- 4.25 Accordingly, we consider that a conservative approach should be taken to this site and delivery in the trajectory delayed to years 2025-30.

Sharpness New Settlement

- 4.26 We have already highlighted our concerns with the overall allocation of land at Sharpness and the fact that in our view, this is an unsustainable location for growth that has significant and overwhelming viability challenges. Aside from this, we have also reviewed the trajectory put forward and note the significant level of homes that are anticipated to come forward within the next 10 years.
- 4.27 Based on a high-level review of the Lichfields paper, the first homes would not be delivered for at least 8.4 years. However, given the scale of the scheme proposed and the mitigatory measures and infrastructure that is going to be required to make the development acceptable in planning terms (if that is indeed possible), we cannot envisage an application being submitted prior to the Inspector ratifying any allocation for the site, and the plan being adopted. As such, based on a Local Development Scheme which anticipates adoption in Autumn 2022, even if an application were submitted this year, it would be anticipated that development would not occur until at least 2030. As such, it is unrealistic to assume that 500 homes could be delivered within the next five-year period.
- 4.28 Further to this, the level of delivery anticipated in the later stages of the plan period are beyond anything previously achieved across the UK. To compare, Didcot Parkway, one of the best-selling sites in the country, have only achieved circa 350 units per year across 6 outlets (1,750 over a five-year period). Sharpness is yet to be market tested, therefore the level of uncertainty is extremely high.
- 4.29 It therefore highly unrealistic that the site will deliver the 2,400 homes envisaged in the plan period and definitely not within the first 10 years of the plan.

Stonehouse North-West

- 4.30 The allocation at Stonehouse North-West is for a further 700 dwellings and is a further extension of the Great Oldbury Drive site which was allocated in the 2015 Local Plan. The site is controlled by Robert Hitchins and Redrow Homes and a detailed application will be submitted in August 2021 for the development. Further to this, the spine road for the original Stonehouse allocation has already been delivered, meaning there is no requirement to wait for access to be provided before homes can be completed in this location.
- 4.31 As such, the assumptions underpinning this allocation and deliverability of the site is reasonable, in light of the evidence presented.

Wisloe

- 4.32 As set out within our previous representations and within other sections of this statement, we have significant concerns in relation to the allocation of this land, not least because it is essentially a further extension of Cam and there is very little evidence to underpin it as a credible and deliverable allocation.
- 4.33 Notwithstanding this, we have again assessed the proposals and whether the trajectory is realistic over the plan period. Based on the Lichfield's paper it would take circa 7 years from the submission of an application through to the delivery of the first home on site. Given this is a GCC controlled parcel of land, and the level of objection from members to this scheme, we do not anticipate that an application would be submitted until the allocation is ratified by the Inspector and / or the plan is adopted for political reasons at least. Currently this is planned for Autumn 2022 (which in itself is ambitious given the delays associated with the preparation of Local Plans and the need for further stages of consultation in respect to modifications to the plan), even if an application were to be submitted immediately it would be surprising if any homes could be delivered prior to 2030. It is therefore highly unrealistic to expect 50 homes to be delivered within the next five years, followed by a significant increase in delivery equated to 565 homes over the five-year period.
- 4.34 As such, aside from the overall viability and deliverability of this scheme, it is highly unlikely that during the first or second five-year period would homes be delivered.

Conclusion on the Deliverability of Sites

- 4.35 Having reviewed the strategic allocations set out in the Local Plan, we consider that the timeframes suggested within the trajectory is unrealistic and sites come 'online' much later than anticipated due to the infrastructure requirements and scale of the sites involved.
- 4.36 We therefore question whether, in light of our analysis which identifies that sites will not come forward as planned, SDC will be able to demonstrate a rolling 5YHLS within the first five years of the plan period due to the overreliance on strategic sites that require significant levels of infrastructure to come forward. This is because the allocations will not 'plug the gap' as anticipated by November 2023.
- 4.37 We also consider that in some cases, we have been conservative in our approach, with some Inspectors unlikely to agree that an outline application can be included within a 5YHLS trajectory even with pending RMs included.
- 4.38 As set out in our representations to the AHO Consultation, this is why a mix and balance of sites is required to ensure choice and competition in the market and to ensure homes will be delivered in a timely manner in the early parts of the plan period to boost housing supply. As the Lichfield's analysis sets out, it is likely that only sites of less than 500 units have the potential to deliver housing in the five-year period (with a proportion offering detailed planning permission from the outset) and it is essential additional sites of this scale be selected to provide a more balanced portfolio and boost five-year supply in the early stages of the plan period, while also reducing the current overreliance on strategic scale sites.

5.0 **LAND NORTH OF HYDE LANE, WHITMINSTER**

5.1 In light of the above evidence, we consider that certain strategic-scale allocations such as Wisloe and Sharpness ought to be removed from the Plan and replaced with other, more suitable allocations, such as Whitminster and Kingswood. In our view, this would make policy CP2 sound.

5.2 We have previously set out in Section 5 and Section 7 of our representations to the AHO consultation (please see Appendix H) why we consider that the site is a suitable location for growth and at this stage, we were pleased to see the settlement being considered as an option for strategic-scale development and it is unfortunate it has not been taken forward into the draft Plan.

5.3 In summary our representations identified the following points in support of growth in this area:

- Whitminster is identified as a Tier 3a Accessible Settlement with Local Facilities and is therefore a sustainable location for growth;
- Whitminster sees a net importer of workers (1.41 jobs per economically active resident) compared to other settlements in the District, therefore it would seem logical to place housing development in this location where people would be able to reasonably travel to work via methods other than the private car; and
- Bus operators such as Stagecoach are fully supportive of extending the 'rapid transit corridor along the A38 and therefore see a significant benefit of development in this location.

5.4 We have reviewed additional information in relation to Whitminster and expanded on some of the points raised previously below.

Affordable Housing

5.5 We have examined the provision of affordable housing across Stroud and in particular the Whitminster area; having studied this it is our view that the lack of delivery at this settlement in previous years and in future will have an impact on the ability to meet general market and affordable housing need in this location, which will in turn affect affordability.

5.6 We have reviewed the historic applications in Whitminster since 2011 and we can only find two major applications which delivered affordable housing – the first at School Lane

(Application Ref: S.11/1002/FUL) for 14 affordable dwellings, and land at Parklands Farm School Lane (Application Ref: S.14/0716/OUT) for up to 31 dwellings (10 affordable homes provided).

- 5.7 Based on the available evidence, we estimate that only 45 affordable homes have been completed in Whitminster since 2011. This is a limited amount of delivery, and given that the most recent data indicates that there are 62 applicants on the Homeseeker Plus register in need in Whitminster (July 2021), of which only a fraction will be addressed by the proposed allocations at this settlement, it is suggested that further homes should be allocated in this location. Furthermore, whilst the Homeseeker Plus register is a good indicator of need, it is not likely to fully reflect the number of households seeking accommodation in Whitminster, as not all people in need will be registered – furthermore it is just a snapshot of current need and this will increase over time.
- 5.8 As such, we consider that additional homes should be delivered in this location to address affordable housing demand.

Economically Active People to Number of Jobs

- 5.9 Within our previous representations we highlighted the fact that Whitminster has a high number of jobs compared to people, equating to a ratio of 1.41:1. This ranks amongst one of the highest within the list of settlements, with only Kingswood and Stonehouse ahead of this. We have reiterated this table below for ease of reference:

Table 3. Comparison of Ratio of Jobs : Workers

Settlement	Ratio of Jobs : Workers
Stonehouse	1.75 : 1
Kingswood	1.63 : 1
Whitminster	1.41 : 1
Brimscombe	1.06 : 1
Eastington (Alkerton)	1.06 : 1
Frampton on Severn	1.04 : 1
Upton St Leonards	0.98 : 1
Minchinhampton	0.88 : 1
Stroud	0.84 : 1
Painswick	0.82 : 1
Nailsworth	0.78 : 1
Berkeley	0.72 : 1

Dursley	0.69 : 1
Newton & Sharpness	0.65 : 1
Chalford	0.56 : 1
Uley	0.56 : 1
Wotton-under-Edge	0.53 : 1
Hardwicke	0.51 : 1
Cam	0.47 : 1
Leonard Stanley	0.42 : 1
Kings Stanley	0.41 : 1
Whiteshill & Ruscombe	0.38 : 1
Manor Village (Bussage)	0.36 : 1

- 5.10 We therefore suggested that in order to meet the Local Plan's goal of providing '*appropriate development ... to sustain or enhance the role, function and accessibility of Whitminster and Frampton-on-Severn as Tier 3a Accessible Settlements with Local Facilities*', land should be allocated in this area.
- 5.11 In our view, the existing imbalance between jobs and workers in this location needs to be supported by commensurate housing growth to give people the opportunity to walk or cycle to work, supported by bus services and infrastructure which has already been planned and costed for by local providers – such as Stagecoach, which we highlighted in our previous representations (paragraph 5.4 of Appendix H of this statement).
- 5.12 At the current time, the provision of just 50 dwellings at Whitminster would only equate to an additional 70 workers (based on the NOMIS labour market statistics which states there are 34.1 million economically active people, and 24.4 million dwellings based on the dwelling stock estimates 2019 – resulting in approximately 1.4 economically active people per dwelling). Given that this would increase the number of economically active people to 560 (based on Census data 2011 which estimates 490 people living in Whitminster), this would still result in an imbalance of jobs and workers at this settlement which should be addressed through increased housing growth.
- 5.13 Accordingly, given the evidence set out, we suggest that additional land should be allocated in this location to address the imbalance of jobs and workers.

Transport

- 5.14 As set out within our previous representations, we consider it to be logical to place development on the A38 where existing transport provision can be strengthened and enhanced (paragraphs 5.4 onwards).
- 5.15 Whitminster, for example, has an existing bus service which runs at least every hour, on six days of the week. This is more than a number of Tier 2 settlements within the settlement hierarchy, or compared to Sharpness. Furthermore, it seems that the sustainability credentials of Whitminster have been underrated within the Settlement Role and Function Update 2018 – for example, the existing bus service through Whitminster reaches the settlement of Quedgley within circa 20 minutes, where there are a range of existing facilities, including supermarkets. In contrast, Sharpness has no such service but is somehow considered to provide a much higher level of accessibility to key facilities. We therefore question the judgements set out within this document and how inaccurate data may have influenced plan-making decisions.
- 5.16 As set out previously, it would be far more logical to place existing development on transport corridors such as Whitminster, where existing bus operators have confirmed that there is a compelling case to extend the bus services in this location.

Technical Assessments

- 5.17 We would direct the Council and the Inspector to our previous representations which discusses the accessibility of the site and the technical work undertaken at that time to underpin the masterplan submitted. Since the consultation period further technical work has been undertaken in the form of a preliminary landscape assessment (Appendix E), a heritage assessment (Appendix F) and drainage note (Appendix G) which has informed the beginnings of a masterplan. We have summarised the findings of these documents below.

Highways

- 5.18 The site is well located and lies on the urban edge of Whitminster and the A38 to the east. Whitminster itself contains a number of everyday facilities, including a garden centre, clothing shop, primary school, playing fields / football club, pub, camping shop, convenience store and mobile post office service.

- 5.19 To the east and west of Whitminster lies Stonehouse and Frampton-on-Severn, where there are a multitude of everyday facilities and services capable of meeting everyday needs. This is easily accessible via public transport using the existing bus stops in proximity to the site, which carry services including the numbers 6, 60, 167, 242, 346 and 860 – between them these provide a service level of circa 4 buses per hour.
- 5.20 The Stagecoach representations submitted as part of the previous consultations highlight the potential to expand and improve these services which already see a significant amount of traffic flow in this location with ease, with the strategy for improving this already agreed and costed.
- 5.21 Proportionate development in this location could therefore support, sustain and enhance existing facilities and services through the provision of the critical mass required to make a viable business case for enhancing and improving infrastructure.
- 5.22 In terms of highways safety Clarkebond have assessed the potential access into the site including visibility splays and are comfortable that circa 200 dwellings can be delivered in this location with no adverse impact on the highways network.

Flood Risk & Drainage

- 5.23 The site lies within Flood Zone 1 and is at low risk from flooding – a drainage note has been prepared by Clarkebond in support of the site’s development and can be found in Appendix G.
- 5.24 They have identified that the existing soil types and bedrock geology indicates that an infiltration-based drainage technique, such as soakaways, may not be appropriate for the site. However, soakaway testing will be undertaken shortly to confirm this, and, if not found to be an appropriate solution, attenuation will be used and convey to the Moreton Valence Rhyne to the north.
- 5.25 A surface water flow path has been identified running across the site, however it is anticipated that through the use of swales which would intercept these overland flows (which are caused by issues to the south and east), this would adequately mitigate any issues with surface water flooding.
- 5.26 As such, there are no flood risk or drainage issues which would preclude the development of the site.

Ecology

- 5.27 A Phase 1 Ecological Assessment has been undertaken by Green Ecology for the land to the east in December. The assessment identified that there are limited ecological constraints to this land however additional surveys have been recommended for birds, bats, reptiles, dormice, and Great Crest Newts.
- 5.28 Any assessment will contain a Biodiversity Net Gains Assessment which will seek to demonstrate a net gain in excess of 10%.

Preliminary Landscape and Visual Findings

- 5.29 An assessment has been undertaken by The Richards Partnership and can be found in Appendix E to this statement. They have identified the following through a site visit including assessing the land from key viewpoints and review of the previous information prepared by SDC:

- The site sits within the relatively flat landscape of the Severn Vale and has a clear relationship with the Cotswold Ridge which lies some 5km to the east;
- The A38 is a busy and fast-moving stretch of dual carriageway which provides a constant visual and aural intrusion which diminishes the tranquillity of the site;
- The historic setting of the site has been largely lost by the introduction of modern buildings which have broken or reduced the visual relationship;
- A narrow belt of trees is located alongside the site's northern boundary, these are quite young however;
- A more significant group of trees lie adjacent to the site within the south-east which provide a degree of containment;
- As the site sits on low-lying ground, this precludes any visual relationship with the land to the south and west, as a result the land's primary relationship is to the north and east;
- There is clear inter-visibility between the site and the houses facing onto Hyde Lane and any future development would need to provide a sympathetic and well-connected extension to the village;
- From the viewpoints identified and footpaths within the area, there are views of the site – therefore the landscape structure on the boundaries of the site needs to be robust to help screen views;

- Given the low-lying nature of the site, it is judged to have the capacity to accommodate meaningful landscape buffers around the perimeters of the site which will successfully mitigate visual effects to the north and north-east; and
- It is therefore judged that the site could accommodate housing development and any adverse landscape and visual effects would be concentrated on the site itself and would not extent beyond the immediate locality.

5.30 The Richards Partnership have then presented a landscape constraints plan at the end of the document which shows a number of strong landscape buffers along the northern, eastern and western boundaries, as well as enhancing the existing hedgerow that currently divides the site. As such, we consider the work undertaken to date will ensure there is a landscape-led approach to the site's development and there will be no adverse impacts in this regard.

Heritage

5.31 A Heritage Assessment has been undertaken by RPS which assesses the relevant built assets within a search radius, identifying whether any of them have the potential to be affected by the proposed development. Their findings are as follows:

- The site makes some contribution to the significant of some listed buildings, notably Jaxon's Farmhouse, Oak Cottage and The Church of St Stephen. However, in all cases, this contribution is secondary to the interest derived from the fabric of the buildings themselves;
- Listed buildings to the north, such as those on the edge of Moreton Valence, can only be seen in glimpsed views which provide no understanding of the architectural nor historic interest;
- The exception to this is the tower of the St Stephens Church in Moreton Valence which is clearly visible, however the site only makes a negligible contribution to the overall significance of this Grade I listed building;
- Having reviewed the significance and setting of King's Orchard, it has been determined that the site does not make any particular meaningful interest or contribution to its overall significance;
- The historical and architectural special interest of Oak Cottage is embodied within its built fabric. The asset has a high degree of architectural value but the site itself only has a limited positive contribution to its overall significance;
- In light of the above, design advice includes the following:
 - Development should be set back from Jaxon's Farmhouse and provide a buffer of open land with tree planting;

- Building heights limited to 2 – 2.5 storeys; and
- Use allotment areas or other public landscapes spaces to establish and reinforce a strong semi-agricultural edge-of-settlement character across the development to limit inter-visibility.

5.32 As such, the proposals will be informed by this heritage assessment and demonstrates that, provided the above is taken into account and embedded into the design, there will be no adverse impacts in relation to the nearby listed buildings and their setting.

Conclusion

5.33 The technical work undertaken to date which is primarily landscape-led is informing a masterplan which is currently being prepared.

5.34 The proposals will incorporate up to 200 dwellings and policy compliant affordable housing to meet Whitminster’s needs, as well as lying in a suitable location for growth where existing transport corridors can be supported.

6.0 CONCLUSIONS

- 6.1 In summary, we continue to have significant concerns that the current Local Plan strategy relies too heavily on strategic sites. Such sites have no realistic prospect of coming forward within 5 – 10 years which will have a knock-on effect on five-year housing land supply. The Plan therefore fails to be effective in this respect as it does not front-load supply to a degree that provides a robust five-year supply in the first five years of the plan, and thereby does not allow SDC to meet its obligations to maintain such a supply. Such an approach is inconsistent with national policy as a result because it will be ineffective at delivering sufficient housing in a phased way throughout the plan period.
- 6.2 We also do not consider the plan to be sound because of a lack of credible evidence to underpin the allocation of land both at Sharpness and Wisloe and we continue to be concerned over the viability and deliverability of these allocations as no robust evidence has been presented to demonstrate how infrastructure has been costed and how development will pay for it, which is likely to be required at an early stage in the development, therefore exacerbating the problem of funding. It is therefore not justified, and consequently unsound.
- 6.3 Furthermore, there is little provision for Whitminster in terms of complementary housing delivery to support the existing employment and jobs identified in this area, and as such, we consider that the aforementioned strategic allocations should be removed and replaced with more suitable and sustainable locations that already have new infrastructure costed and planned for, where concentrations of jobs already exist to avoid extensive commuting and facilities are available that are easily accessible via non-car means. This would include at locations such as land north of Hyde Lane, Whitminster.
- 6.4 Redrow's proposals for land at Hyde Lane, Whitminster circa 200 homes, a retail facility to serve the wider village and extensive parkland and open space, providing significant green infrastructure for not only future but existing residents use as well.
- 6.5 Technical work to date has not identified any significant constraints to the site's development, with the proposals underpinned by a landscape-led strategy to ensure that there will be no adverse effects of the development.
- 6.6 We therefore conclude that the inappropriate strategic allocations of Sharpness and Wisloe should be removed to make the plan sound, and land should instead be allocated across other strategic sites and smaller allocations to ensure a balance of sites are achieved, to boost housing supply in the short-term to ensure that the plan is effective for its lifetime.

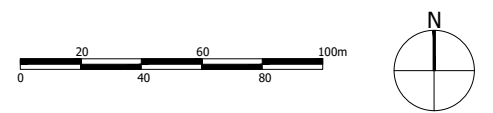
APPENDIX A
SITE LOCATION PLAN

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Revision _____ Date _____ Dm _____ Ckd _____

LEGEND

 Site Boundary



Project
**Land at Hyde Lane
Whitminster**
Drawing Title
Site Location Plan

Date
22.01.20
Scale
1:2500@A3
Project No
30062
Drawing No
9000



BARTON WILLMORE

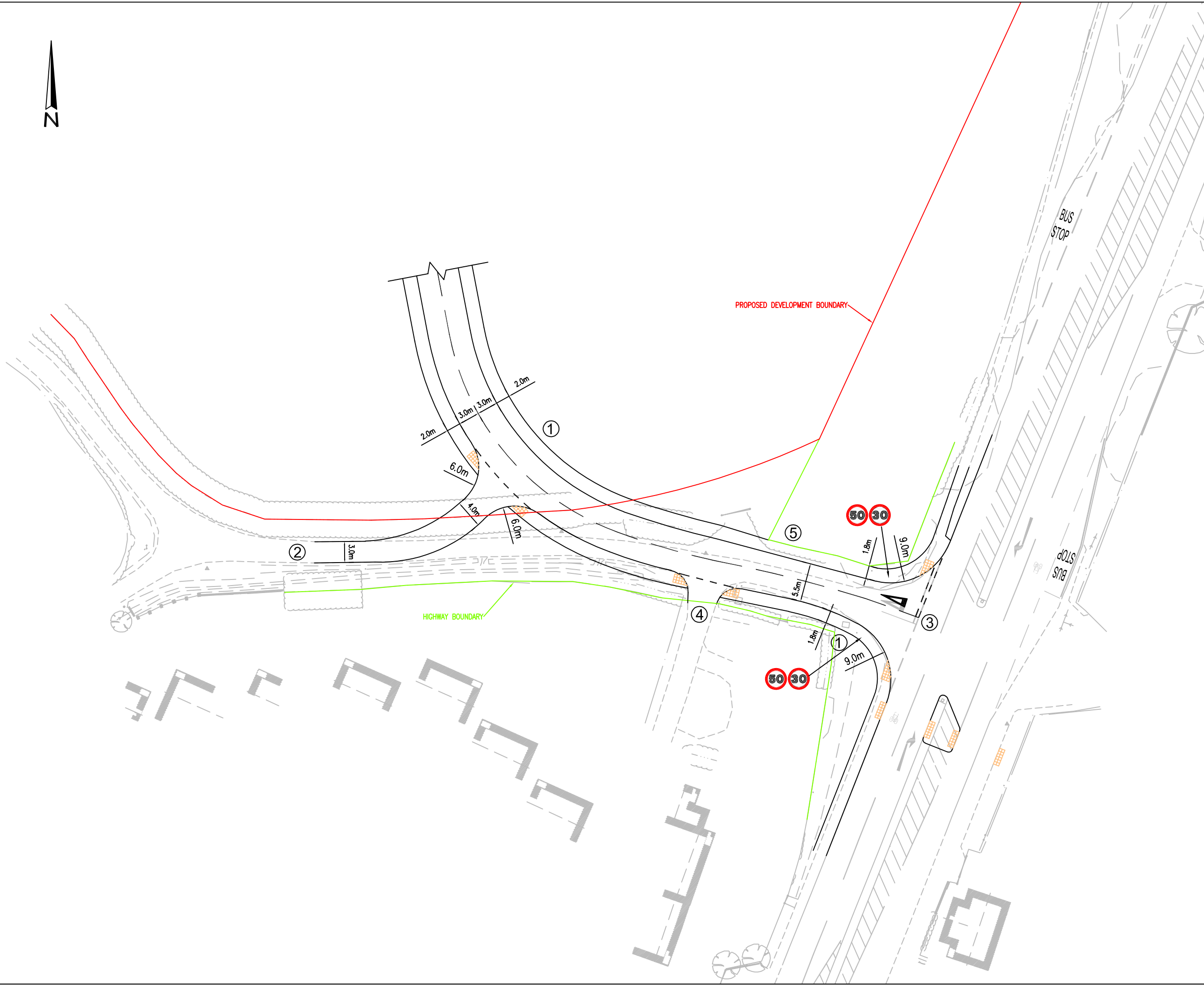
Planning • Master Planning & Urban Design • Architecture •
Landscape Planning & Design • Environmental Planning • Graphic
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APPENDIX B
SITE ACCESS, JUNCTION VISIBILITY SPLAYS, PEDESTRIAN REFUGE AND VEHICLE
REFUSE PLANS

DWG INFO: M:\BS1192\B05128 - WHITMINSTER\01_WIP\DR_DRAWING\B05128-T-SK01A,SK02A,SK03A,SK04A,SK05A-WHITMINSTER ACCESS PROPOSAL



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- NOTES:**
 DESIGNED WITH REFERENCE TO THE MANUAL FOR GLOUCESTERSHIRE STREETS
1. CARRIAGEWAY WIDENED TO ACCOMMODATE TURNING VEHICLES
 2. CARRIAGEWAY TIES INTO EXISTING CARRIAGEWAY
 3. EXISTING JUNCTION MOVED TO ACCOMMODATE FOOTPATH
 4. EXISTING JUNCTION
 5. LOCALIZED NARROWING OF FOOTWAY

A	FOOTPATHS ALTERED TO 1.8m WIDTH	CWB	DAK	09.09.19
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Rev	Detail	By	Chk	Date
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Revisions

clarkebond
 MULTIDISCIPLINARY ENGINEERING CONSULTANTS

Client
 Redrow Homes

Project
 WHITMINSTER

Drawing Title
 SITE ACCESS PROPOSAL

Drawing Status
 DRAFT

Project No.	Discipline	Drawing No.
B05128	C	SK01
Scale	Date	Revision
1:500	05.09.19	
Drawn	Checked	Sheet Size
		A3
		Revision
		A

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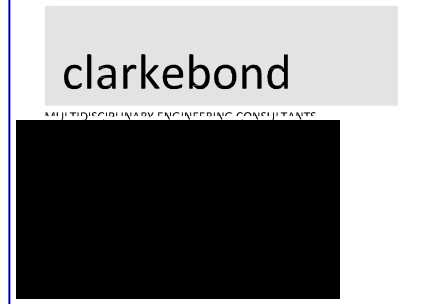


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DB32 Refuse Vehicle
 Overall Length 7.900m
 Overall Width 2.400m
 Overall Body Height 3.183m
 Min Body Ground Clearance 0.388m
 Max Track Width 2.400m
 Lock to lock time 6.00s
 Kerb to Kerb Turning Radius 9.625m

Rev	Detail	By	Chk	Date
A	FOOTPATHS ALTERED TO 1.8m WIDTH	CWB	DAK	09.09.19



Client
Redrow Homes
 Project
WHITMINSTER

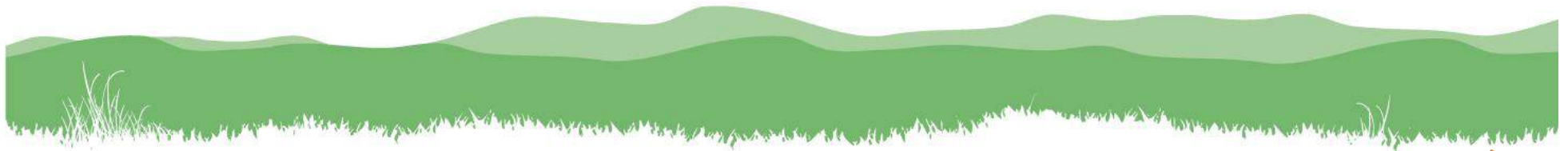
Drawing Title
VEHICLE TRACKING - REFUSE

Drawing Status
DRAFT

Project No. B05128	Discipline C	Drawing No. SK02
Scale 1:500	Date 05.09.19	Revision A
Sheet Size A3		

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APPENDIX C
PRELIMINARY ECOLOGICAL APPRAISAL



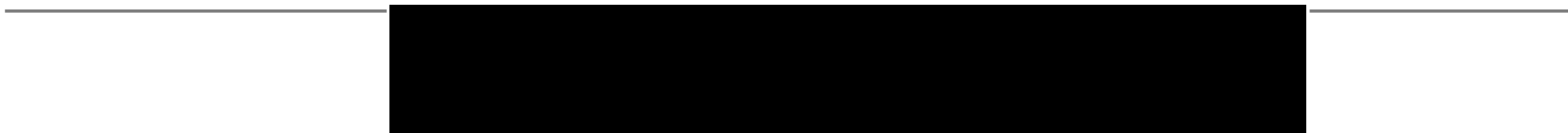
Ecological Constraints and Opportunities Report

Hyde Lane, Whitminster, Stroud, Gloucestershire

(central OS grid reference: SO 777 085)

A report on behalf of Redrow Homes

Ref: 1012-ECOP-FM



1. Introduction

This document has been produced by Green Ecology on behalf of Redrow Homes to provide preliminary ecological constraints and opportunities at the above site.

Note that this document aims to provide design and planning advice prior to further surveys that may be required, and it is not intended to be submitted with a planning application to develop the Site. However, recommendations have been provided below with a view to support and enhance any future applications.





2. Site Survey

The survey comprised an Extended Phase 1 Habitat Survey and habitat condition assessment undertaken on 23 December 2019, supplemented by a desk-based study, whereby biological data was obtained from the Gloucestershire Centre for Environmental Records (GCER). This survey identified the potential for protected species for which surveys need undertaking (see **Section 5**).

3. Results

Figure 1 shows the survey area and identifies key constraints as well as opportunities to avoid, mitigate and enhance key ecological features.

Table 1 provides more detail of issues for consideration. In summary, recommendations are made to ensure the design meets nature legislation and the principles of the NPPF and local policy, including:

-  Sites of importance to wildlife should be safeguarded, e.g. SACs/ SPAs, SSSIs, locally designated sites and ecological networks/ corridors;
-  Developments should apply the mitigation hierarchy: avoid, mitigate, compensate;
-  Avoid loss of irreplaceable habitat e.g. ancient woodland or trees;
-  Conservation and enhancement of biodiversity is supported, especially where this secures measurable net gains for biodiversity.

4. Biodiversity Net Gain

The Government are planning to roll out a requirement for achieving a 10% net gain in biodiversity for all developments once the Environment Bill is enacted. This 10% gain relates to both linear habitats (e.g. hedgerows) and non-linear habitats (e.g. grassland/woodland) and requires the use of a 'metric' to calculate the required biodiversity units. Some LPA's already request the use of the metric through current or emerging policies. For this site, the use of the metric should be confirmed with the LPA ecologist.

Habitats of high 'distinctiveness' should be targeted for retention such as hedgerows, woodland and watercourses and new habitats with high distinctiveness can be created

to provide net gains. Offsite measures may be acceptable through legal agreements but should only be sought once all on-site options have been explored.

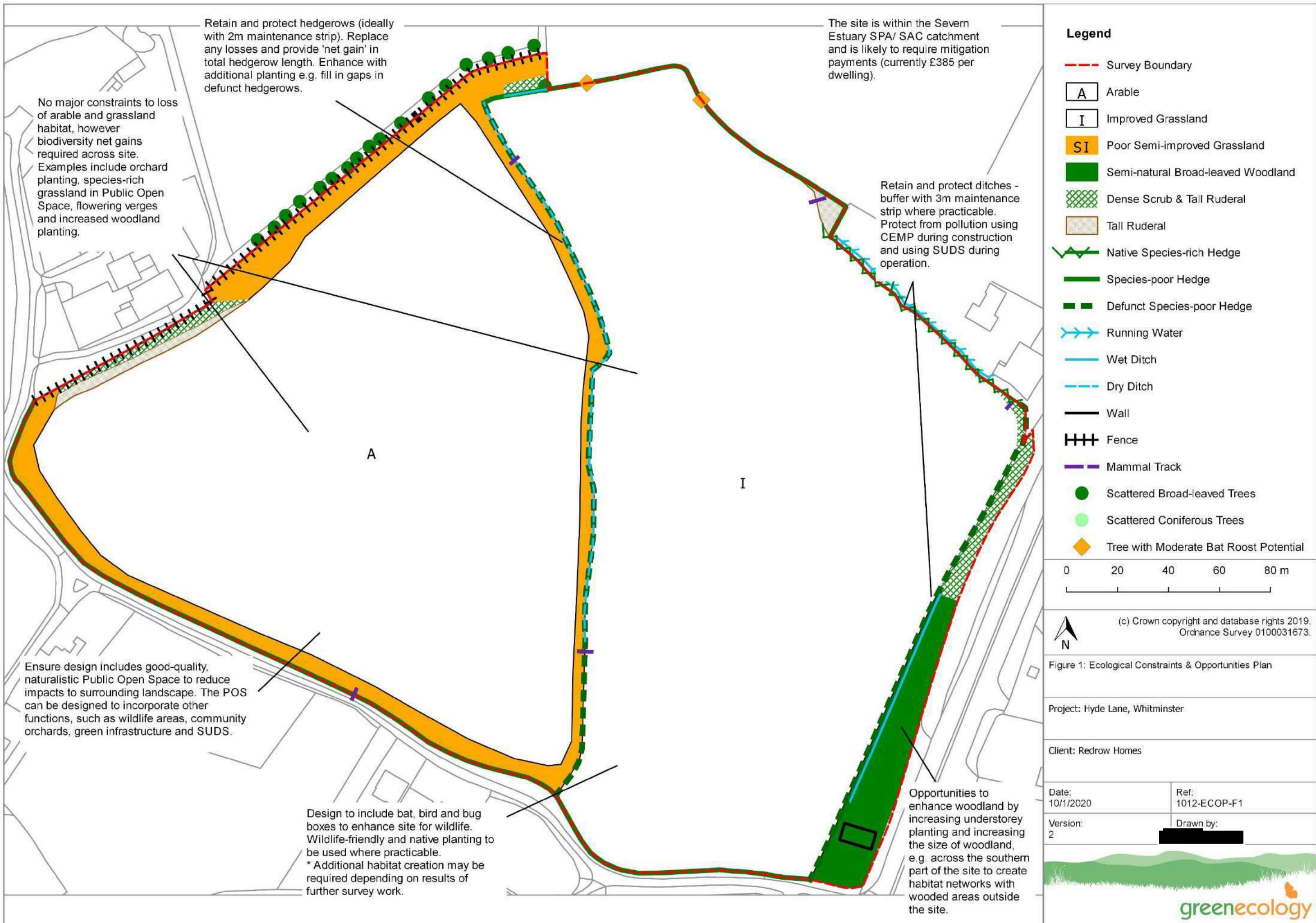
Refer to **Tables 2 & 3** for an indication of the BNG requirements on this Site.

4. Further Survey Work

The timeline below shows the further ecological survey work that would be expected to accompany a planning application and to inform suitable mitigation.

TASK	Jan Mar	-	Apr	May	Jun	Jul	Aug	Sept	Oct Dec	-
Bird surveys – requirement/ scope to be agreed with LPA as to need for winter bird surveys.										
Commuting/ foraging bats – (1 transect walked monthly & 3 static automated bat detectors per visit, for 5 nights)										
Reptiles (8 visits, approx. 50 refugia)					Sub-optimal					
Dormouse survey (50 tubes April/ May to September)										
Great crested newt eDNA survey										
Ecological Impact Assessment for Planning Application, including BNG Assessment										

Many of these surveys are seasonally constrained and therefore ecological advice early in the project programme is always recommended. However, if there are conflicts with the project timetable, please speak to a member of the team at Green Ecology at an early stage and we will make every effort to find a pragmatic approach that works within your time frame if possible.



- Legend**
- Survey Boundary
 - A Arable
 - I Improved Grassland
 - SI Poor Semi-improved Grassland
 - Semi-natural Broad-leaved Woodland
 - Dense Scrub & Tall Ruderal
 - Tall Ruderal
 - Native Species-rich Hedge
 - Species-poor Hedge
 - - - Defunct Species-poor Hedge
 - Running Water
 - Wet Ditch
 - - - Dry Ditch
 - Wall
 - - - Fence
 - Mammal Track
 - Scattered Broad-leaved Trees
 - Scattered Coniferous Trees
 - ◆ Tree with Moderate Bat Roost Potential
- 0 20 40 60 80 m

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Figure 1: Ecological Constraints & Opportunities Plan

Project: Hyde Lane, Whitminster

Client: Redrow Homes

Date: 10/1/2020 Ref: 1012-ECOP-F1

Version: 2 Drawn by: [REDACTED]



Table 1: Preliminary Constraints and Opportunities Related to Development of Site

Ecological Receptor	Constraints and Likely Impacts During Construction and Operation	Recommended Mitigation, Opportunities and Enhancements
Designated Sites		
<p>Natura 2000 sites within 10km:</p> <ul style="list-style-type: none"> 🍌 Severn Estuary SAC/ SPA/ Ramsar (3.7km west) 🍌 Walmore Common SPA/ Ramsar (6.8km north-west) 🍌 Rodborough Common SAC (8km south-east) 🍌 Cotswold Beechwoods SAC (9.8km north-east) 	<ul style="list-style-type: none"> 🍌 The Site is within the 7.7km Catchment Zone of the Severn Estuary, due to being at risk from increased recreational pressure (refer to Stroud District Council's Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site, December 2017). 🍌 The Site is outside the Rodborough Common SAC Catchment Area for new housing within 3km of its boundary. 🍌 The other sites are unlikely to be at risk from development of this Site. 	<ul style="list-style-type: none"> 🍌 A financial contribution in accordance with the mitigation strategy will be required – currently £385 per dwelling to deliver strategic mitigation via a S106 Agreement. Alternatively, mitigation solutions could be proposed onsite in consultation with the LPA/ Natural England.
<p>Statutory sites within 2km:</p> <ul style="list-style-type: none"> 🍌 Frampton Pools Site of Special Scientific Interest (SSSI) (1.9km south-west) <p>The Site is within an Impact Risk Zone for this SSSI; Natural England will be consulted for 'All residential applications with a total net gain in residential units.</p>	<ul style="list-style-type: none"> 🍌 The Site is designated for standing water formed as a result of gravel extraction. The lakes support a diverse range of aquatic plants and invertebrates and is of local importance for wintering waterfowl. 🍌 The SSSI is in largely unfavourable condition and may be sensitive to recreational pressure and changes in hydrology. 🍌 There are footpaths linking the Site to the SSSI. 	<ul style="list-style-type: none"> 🍌 Include good quality, linked and naturalistic Public Open Space (POS) within design, to provide recreational opportunities within the site itself. 🍌 Ensure that no pollution/ hydraulic changes arise during construction and operation (e.g. through Construction Environmental Management Plan (CEMP) and Sustainable Drainage System).
<p>Non-statutory sites within 2km:</p> <ul style="list-style-type: none"> 🍌 River Frome Mainstream & Tributaries LWS (0.8km) 🍌 Mole Grove LWS (1.1km) 🍌 Gloucester & Sharpness Canal LWS (1.7km) 	<ul style="list-style-type: none"> 🍌 The river and canal Local Wildlife Sites will be susceptible to water pollution if pathways exist from the Site. 🍌 Mole Grove is not publicly accessible and is not expected to be adversely impacted. 	<ul style="list-style-type: none"> 🍌 Ensure that no pollution/ hydraulic changes arise during construction and operation (e.g. through Construction Environmental Management Plan (CEMP) and Sustainable Drainage System).
Habitats		
<p>Arable/ Improved grassland (silage)</p>	<ul style="list-style-type: none"> 🍌 No major constraints – low value botanically and low distinctiveness. 🍌 Compensatory habitat creation required under new Biodiversity Net Gain Metric. 	<ul style="list-style-type: none"> 🍌 Scope to provide net gain by creating areas of species-rich grassland (especially along watercourse and hedgerows), flowering lawns on road verges and other higher quality habitat such as orchards, which are well-recorded in the surrounding area. 🍌 POS provides good opportunities for providing recreational space as well as informal areas with wildlife value.
<p>Plantation woodland</p>	<ul style="list-style-type: none"> 🍌 A small area of low value plantation woodland is present along the eastern boundary. 	<ul style="list-style-type: none"> 🍌 Opportunities to enhance the woodland with additional understorey planting and extending its size, for example along the southern boundary to connect existing wooded/ orchard areas. 🍌 Several traditional orchards are present locally and the scheme offers opportunities to create new orchards for community use.
<p>Ditches</p>	<ul style="list-style-type: none"> 🍌 Small ditches are present on the northern and eastern boundaries. These are likely to drain into rhyes to the north. 🍌 Potential impacts include pollution to downstream receptors. 	<ul style="list-style-type: none"> 🍌 Ensure appropriate mitigation measures are in place during construction (e.g. CEMP). 🍌 Create wildlife-friendly SuDS to prevent pollution incidents to water courses. This can include species-rich wetland meadow planting. 🍌 Buffer ditches with minimum 3m where practicable to protect water

Ecological Receptor	Constraints and Likely Impacts During Construction and Operation	Recommended Mitigation, Opportunities and Enhancements
Hedgerows	<ul style="list-style-type: none"> Species-rich and species-poor hedgerows are a Habitat of Principal Importance (S41 of NERC Act), Gloucestershire BAP habitat and important ecological feature. 	<p>from pollution as well as allow access for management.</p> <ul style="list-style-type: none"> Retain where possible, restore and buffer (outside property boundaries) to allow future management. Enhance species-poor/ defunct hedgerows with additional planting. Can form part of green infrastructure strategy. Replace any losses and plant new native hedgerows to provide 'net gain'.
Fauna		
Birds	<ul style="list-style-type: none"> Protected under Wildlife and Countryside Act (WCA) 1981. Potential for offence to be committed by damaging/ destroying active birds' nests. A large number of notable birds have been recorded within 2km of the Site, including barn owl and wintering wildfowl (due to the proximity of the estuary). The hedgerows in particular may support breeding farmland birds of conservation concern. The scope of further surveys should be agreed with the LPA – whether winter bird surveys are required due to the proximity to the SPA. 	<ul style="list-style-type: none"> Retain trees and hedgerows that provide nesting habitat for birds. Provide new nesting opportunities e.g. new berry-producing shrubs, place nest boxes on retained trees and incorporate nest boxes into new buildings. Time vegetation clearance to avoid bird breeding season (March – August inclusive), including ground-nesting birds, or with a check for active birds' nests.
Bats	<ul style="list-style-type: none"> European Protected Species. Many bats are also Species of Principal Importance under the NERC Act 2006. Site boundaries (trees and hedgerows) may be important commuting/ foraging routes. Surveys required to establish key flyways. 	<ul style="list-style-type: none"> Identify key corridors for bats, retain and buffer these habitats where possible. Avoid direct lighting of key areas during construction and operation. Enhance site with additional roosting opportunities.
Reptiles	<ul style="list-style-type: none"> Protected under WCA 1981. Risk of an offence being committed (killing/ injury of reptiles) during clearance of suitable vegetation (e.g. woodland/ ditch edges, hedgerow bases, long grass). Surveys required to establish presence/ absence. 	<ul style="list-style-type: none"> Retain woodland areas and enhance 'edge' habitat. Enhance site to increase the value for reptiles e.g. habitat enhancement such as rough grassland, pond and log piles.
Invertebrates	<ul style="list-style-type: none"> The woodland, ditches and hedgerows are likely to support common/ widespread invertebrates and potentially some notable species. Ideally these habitats should be retained or suitable replacement habitats included in the design. 	<ul style="list-style-type: none"> The buildings could incorporate a green roof and bee/bug bricks. A range of habitats should be retained/ created within POS, including orchards to support specialist invertebrates. New planting schemes should include wildlife friendly species e.g. selected from the RHS Perfect for Pollinators list.
Great Crested Newt	<ul style="list-style-type: none"> There are a collection of four ponds within approximately 300m north-west of the Site and a further two within 500m. Great crested newts (European Protected Species) have been recorded 880m south-east. The majority of the Site provides low value foraging habitat, although the hedgerows and woodland provide some commuting and foraging potential. An eDNA survey should be undertaken in the first instance to establish [presence/ absence within 500m. If present, the development could result in a permanent loss of terrestrial habitat for this species and result in an offence under UK and EU legislation. Traditional survey and licensing techniques can be used, or the Stroud GCN District Licensing Scheme. 	<ul style="list-style-type: none"> It is recommended that initially eDNA samples are taken within ponds within 500m. If present, it may be possible to avoid further surveys through the Stroud GCN District Licensing Scheme. This is an optional approach but may reduce cost and speed up the licensing process. Alternatively, surveys of surrounding ponds should be undertaken, and appropriate mitigation undertaken on site – for example including high quality terrestrial habitat providing wildlife corridors and new ponds. A licence from Natural England may be required.







Ecological Receptor	Constraints and Likely Impacts During Construction and Operation	Recommended Mitigation, Opportunities and Enhancements
Dormouse	<ul style="list-style-type: none">  European Protected Species. The site provides good quality hedgerows for this species although there are no known records within 2km. Surveys required to establish presence/ absence.  If present, a licence from Natural England is likely to be required for hedgerow removal. 	<ul style="list-style-type: none">  Avoid removal of hedgerows and woodland.  If present, mitigation will involve additional hedgerow/ woodland planting (at least 2:1) and timing constraints to vegetation removal.
Water vole	<ul style="list-style-type: none">  Water vole are protected via the Wildlife & Countryside Act 1981 (as amended) – the larger ditch on the northern boundary may support this species and presence should be assumed (survey access not possible). 	<ul style="list-style-type: none">  Buffer ditch to avoid disturbance of riparian mammals.

Table 2: Biodiversity Metric Indicative Baseline Calculations (Habitats)












Habitat Distinctiveness	Habitats on Site	Current Condition	Units on Site	Requirements to Deliver Gain	Likely Delivery
Very Low	None	N/A			
Low	Modified/ Improved Grassland, Arable and Ruderal Vegetation	Poor	16.3	Same distinctiveness or better habitat required	<ul style="list-style-type: none">  Retain existing grassland where possible e.g. in buffers and enhance to 'good' condition  Create species-rich meadow (higher distinctiveness)  Create other high distinctiveness habitats e.g. scattered trees, woodland, orchard, marshy grassland, ponds, wetland
Medium	Mixed Scrub	Poor	0.18	Same broad habitat or a higher distinctiveness habitat required	<ul style="list-style-type: none">  Retain and enhance to 'good' condition  Replace with broadleaved woodland
High	None	N/A			
Very High	None	N/A			

Table 3: Biodiversity Metric Indicative Baseline Calculations (Hedgerows)

Habitat Distinctiveness	Habitats on Site	Current Condition	Units on Site	Requirements to Deliver Gain	Likely Delivery
Very Low	None	N/A			
Low	Native Species-Poor Hedgerow	Moderate	4.28	Same distinctiveness or better.	<ul style="list-style-type: none">  Retain and enhance to 'good' condition  Create new species-rich hedgerows to replace losses and provide net gain
		Good			<ul style="list-style-type: none">  Retain where possible  Create new species-rich hedgerows to replace losses and provide net gain
Medium	Species-rich Hedgerows	Moderate	3.53	Like for like or better	<ul style="list-style-type: none">  Retain and enhance to 'good' condition  Create new species-rich hedgerows to replace losses and provide net gain
High	None	N/A			

Very High	None	N/A
-----------	------	-----

NOTE – more biodiversity units are available when habitats are retained and protected during construction, and then ‘enhanced’ through management. A detailed assessment will be required as the scheme develops, which will indicate the habitat areas required. To achieve a 10% gain (if requested by LPA), the Site will need to demonstrate 18.1 habitat units and 8.6 linear (hedgerow) units.

6. Conclusions

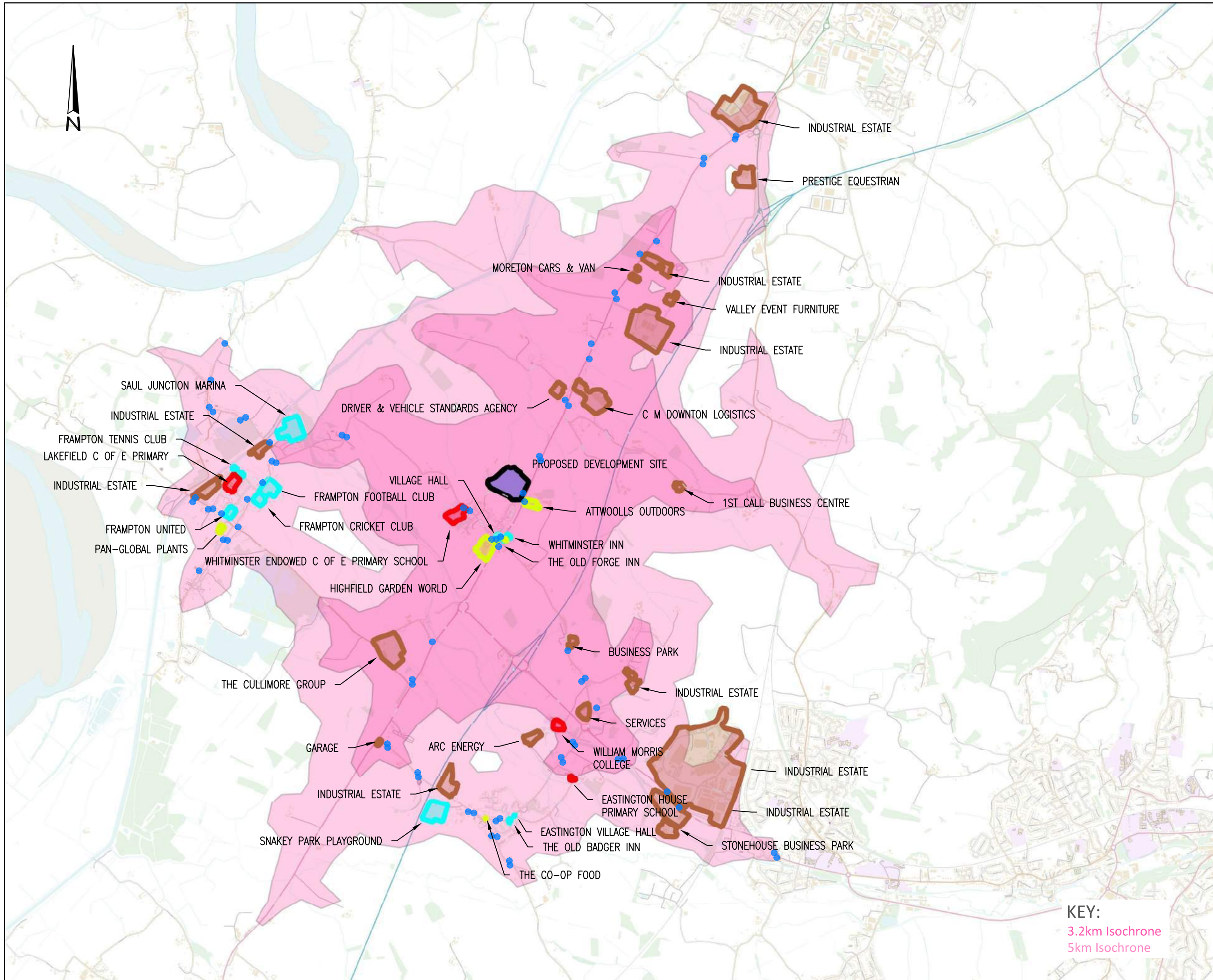
The preliminary survey work has not identified any major ecological constraints to development of the site.

Whilst further surveys are required to help fully inform the emerging masterplan for the site, it is considered that the habitats of ecological value can be readily accommodated into a sensitively designed scheme and measures can be implemented via the district strategy to prevent impacts to European designated sites. There remains ample opportunity for mitigation, compensation and enhancement measures on site through careful design, following the guidance given above.

Overall, it is considered that there are no significant or in-principle ecological constraints that would preclude the residential development of the site, and there is moreover the opportunity to achieve biodiversity net gain and compliance with local and national policy.

APPENDIX D
WALKING & CYCLING ISOCHRONES

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KEY:
 3.2km Isochrone
 5km Isochrone

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KEY
 ■ EDUCATION
 ■ EMPLOYMENT
 ■ RETAIL
 ■ LEISURE
 ■ PROPOSED DEVELOPMENT SITE
 ● BUS STOP

Rev	Detail	By	Chk	Date
*	PRELIMINARY FIRST ISSUE.

clarkebond
 MULTIDISCIPLINARY ENGINEERING CONSULTANTS

Client
REDROW HOMES
 Project
WHITMINSTER

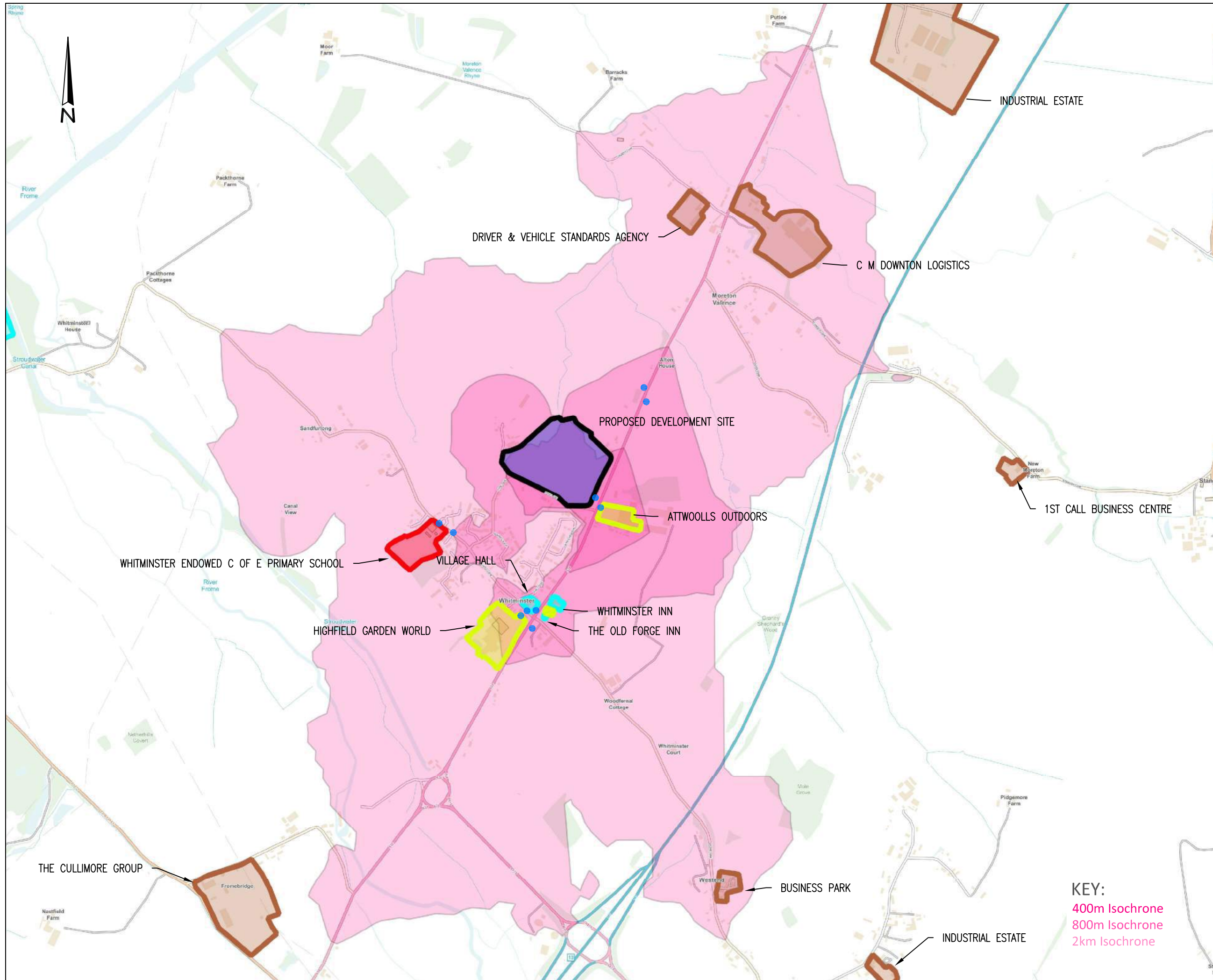
Drawing Title
CYCLING ISOCHRONES

Drawing Status
DRAFT

Project No.	Discipline	Drawing No.
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Scale	Date	Revision
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KEY:
 400m Isochrone
 800m Isochrone
 2km Isochrone

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KEY

- EDUCATION
- EMPLOYMENT
- RETAIL
- LEISURE
- PROPOSED DEVELOPMENT SITE
- BUS STOP

* PRELIMINARY FIRST ISSUE.			
Rev	Detail	By	Chk Date

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Client
 REDROW HOMES

Project
 WHITMINSTER

Drawing Title
 WALKING ISOCHRONES

Drawing Status
 DRAFT

Project No.	Discipline	Drawing No.
B05128	C	FIG 1
Scale	Date	Revision
NTS	24.12.19	*
	Sheet Size	
	A3	

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APPENDIX E
LANDSCAPE AND VISUAL IMPACT ASSESSMENT

Land at Hyde Lane, Whitminster

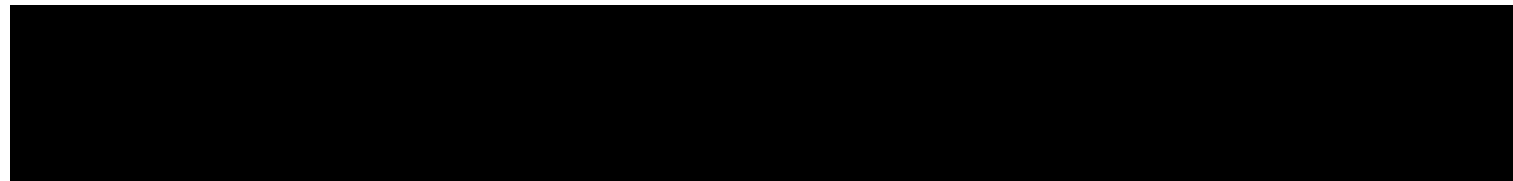
Preliminary Landscape and Visual Findings

for Redrow Homes Ltd



June 2021

Land at Hyde Lane, Whitminster : Preliminary Landscape and Visual Findings			Document Ref: 21-28-CR01	
Revisions				
Revision	Date	Description	Prepared	Approved
0	09/06/2021	Document created	[REDACTED]	
A	09/07/2021	Landscape Strategy updated		



Contents

Section 1

Introduction

Section 2

Landscape Character

Section 3

Visual Context

Section 4

Evidence Base

Section 5

Emerging Masterplan

Section 6

Summary

Purpose of the Document

This preliminary landscape and visual report has been prepared on behalf of Redrow Homes Ltd in relation to the potential for residential development on Land at Hyde Lane, Whitminster (the site). It has been prepared by The Richards Partnership, an experienced practice of landscape architects and urban designers.

Stroud District Council is currently in the process of reviewing the current Stroud District Local Plan, the Pre-Submission draft of which was made public on 29th April 2021. The council is accepting representations in regard to this draft up to 7th July 2021 and this forms part of a submission by Redrow Homes with regard to this site.

The council has undertaken a number of assessments over recent years which have been used as part of the evidence base for the Local Plan. These include:

- The Stroud District Landscape Assessment (November 2000);
- The Stroud District Sensitivity Assessment (December 2016); and
- The Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of Forest of Dean District (May 2020).

This report will consider the findings of these assessments in relation to the site as well as considering the site as an individual parcel of land and the role it plays within the character and visual amenity of the wider landscape.

In consideration of the above this report will propose a landscape strategy for the development of the portions of the site which are considered both suitable and achievable for residential development. The site measures 7.68Ha and is being promoted to deliver circa. 200 dwellings.

Introduction to the Site

The site is located adjacent to the A38 immediately to the north of the village of Whitminster. The village is located approximately 5km to the south of the southern edge of Gloucester and 1.5km north of Junction 13 of the M5.

While the busy A38 forms the site's eastern boundary, its southern boundary is formed by a narrow unmarked lane known as Hyde Lane. Its western and northern boundaries are formed by hedgerows which largely give way to agricultural land. A commercial garage is located on the A38 next to the site's north-eastern corner, while a cluster of farm buildings, Jaxons Farm, is located close to its western corner. Jaxons Farm itself is a Grade II listed building, however the visual relationship between this building and the site has been largely lost due to the intervening, modern farm buildings which separate the two.

The site comprises two irregular shaped agricultural fields, which at the time of the site visit were managed as arable. A study of satellite images suggests that this has been the case for at least the last two decades. The south-eastern field is accessed via a field gate on Hyde Lane, while the north-western field is accessed via Jaxons Farm. A public right of way (No EWH12) runs for a short distance across the western edge of the site close to the farm. A line of telegraph wires run across the site from the A38 towards the western corner of the site.

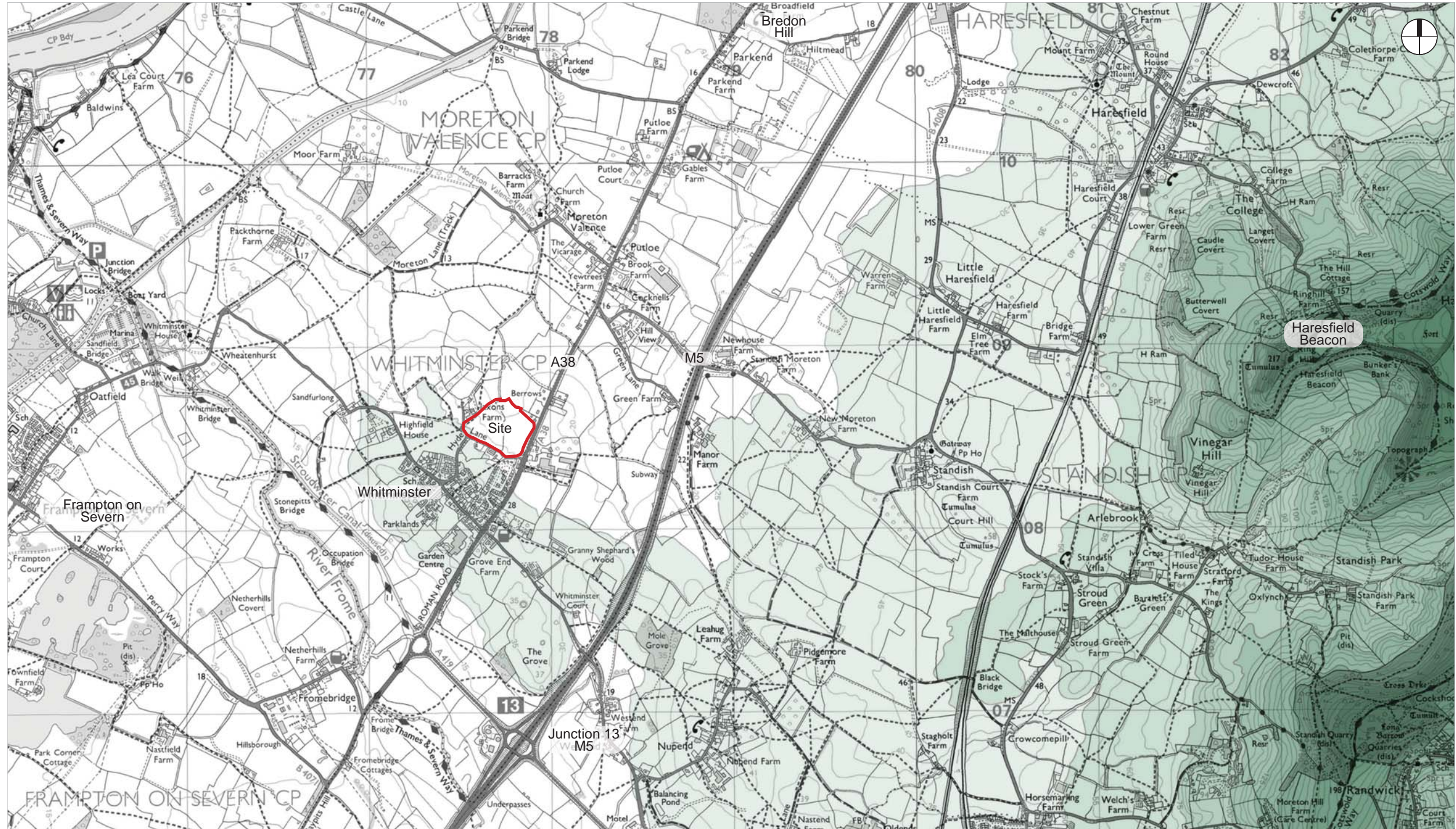
The site rises gently from a low point of approximately 14m Above Ordnance Datum (AOD) at its northern edge to approximately 26m AOD close to its boundary with Jaxons Farm. The boundary with the A38 varies between 18-20m AOD. Whitminster itself is located on a shallow shoulder of land which rises to approximately 32m AOD and which precludes the site having a visual relationship with the landscape to the south.

The site boundaries themselves largely comprise mature, managed hedgerows. However, there is little other vegetation of note, beyond a group of trees along site's south-eastern corner adjacent to the A38 and a number of individual hedgerow trees along the northern boundary. A mature hedge separates the two fields, however, this does not support any mature trees.

The site sits within the relatively flat landscape of the Severn Vale and has a clear relationship with the Cotswold Ridge which lies some 5km to the east and forms part of the designated Cotswold Area of Outstanding Natural Beauty (AONB).

The site itself is not the subject of any designations.

Site Location and Topographical Study



Landscape Character of the Wider Area

Natural England has recorded the landscape character of England through identification of a series of National Landscape Character Areas (NCAs). The site lies within NCA106 Severn and Avon Vales which includes a diverse range of flat and gently undulating landscapes strongly influenced by the River Severn.

More locally the Stroud District Landscape Assessment (2000) identified the site as being within the 'Rolling Agricultural Plain' Landscape Type, sub-type 'Lowland Plain'. The key characteristics the Rolling Agricultural Plain noted in this assessment are listed as follows:

- Varied landscape of open flat plain to more undulating landform towards limestone escarpment.
- Established, old, rich rural lowland, with some woodlands and mature hedgerow trees and occasional orchards.
- Land is dissected by River Cam and Frome to the east.
- Traversed from north to south by M5, railway, Gloucester-Sharpness canal and the A38.
- Semi-enclosed landscape with some distant views, and more restrained views from Frome Valley.
- Churches act as strong foci and landmarks.
- Dispersed pattern of isolated villages.
- Land use is a mix of arable and pasture.
- Strong field pattern medium to small in scale.

With regard to Landform and Context it states:

"The relatively flat, and in places gently undulating topography, that covers the majority of this landscape, defines the expansive Lowland Plain. This area is composed mainly of gravel terraces and head deposits.

Throughout the area the subtle low lying nature of the landform unifies these landscape. Enclosure varies throughout, dependent on topography and pattern of the field enclosure, however views to the steep Cotswold Escarpment that rises dramatically to the east, gives definition to this landscape, as well as contributing orientation and sense of place."

With regard to Land Use and Landscape Pattern it states:

This landscape supports a variety of land uses and contains a range of differing enclosure patterns. On the Escarpment Footslopes pasture is the predominant land use gradually becoming more arable dominated on the Lowland Plain. The pasture fields form a rich textured small scale pattern that is best appreciated from the Escarpment, where views look down onto the footslopes and across the Severn Plain. Within the pastoral landscape the small hedges coupled with the undulating topography proved (sic) a strong sense of enclosure...

... On the Lowland Plain however, enclosure is less, and the arable field pattern more regular and larger scale. Hedgerows are mainly elm, closely clipped to form a low but strong rectilinear pattern and regular rhythm to the landscape, Mature oak trees on the plain, both within hedgerows and free standing are a characteristic, and further reinforce this pattern. Views, however, are predominantly open and uniform, with small orchards providing local interest.

The Stroud Landscape Sensitivity Assessment (2016) considers landscape parcels around settlement edges in more detail and with a view to their sensitivity to development. The report identifies the site as parcel Wh05 and as being of 'high/medium' sensitivity to housing. In summary it states:

The sensitivity of the area lies in its openness and location on the slopes of the low ridge forming part of the skyline north of the settlement which leaves it open to view from the north and north-east, its separation from the main part of the settlement in open countryside and its trees, particularly adjacent to the A38. Its value lies in the Roman Road which runs alongside the A38 and in the PROW which runs alongside the north western boundary. Housing development would be highly visible acting as a major extension to the settlement to the north in open countryside with very limited connection to the main part of the settlement.

The wider area in which the site sits is also assessed within *The Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of the Forest of Dean District* (May 2020). In this document the site falls within *Broad Area 9b*, which encompasses a large swathe of land to the south of Gloucester, and Assessment Area 41 which runs along the A38 corridor encompassing Whitminster and Moreton Valence, extending up to the southern edge of Hardwicke. This assessment judges the landscape to be of 'moderate-high' sensitivity to developments of between 1,500 to 10,000 dwellings.

The Stroud District Local Plan Review Presubmission Draft Plan 2021, which has drawn upon these documents as evidence base concludes in relation to Whitminster and Landscape Sensitivity '*The preferred directions of housing growth in landscape terms are to the northeast and northwest*'.

Landscape Character of the Site

The site comprises two irregular shaped, medium sized fields which are presently managed as arable. These are separated by a mature hedge which runs northwards from Hyde Lane towards the low point close to the northern boundary. The boundaries are formed by mature farm hedgerows, with some small groups of trees along the northern boundary, as well as a notable group in the south-eastern corner. The land is gently undulating and rises to a high point at its western corner. Historic maps show that the westernmost field was previously notably larger, with its current northern boundary appearing to be a Twentieth Century addition.

The village of Whitminster lies on a shallow shoulder of land to the south the site. The historic core of the village is located along School Lane, some 350m further to the south, the village having expanded northwards over the course of the last century. Hyde Lane, which forms the site's southern boundary is a narrow, single track lane which primarily serves Jaxons Farm and the handful of properties located along its southern edge. These are predominantly Twentieth and Twenty-First Century buildings, a number of which have been orientated to face onto the lane, and in turn, the site.

The A38 broadly follows the line of the old Roman Road and runs northwards towards Gloucester. This is a busy and fast-moving stretch of dual carriageway which provides a constant visual and aural intrusion, denuding the tranquility of the site. A wide lay-by is located off the north bound carriageway adjacent to the site.

In addition to the main village itself, there are a number of other properties and businesses located at regular intervals along this stretch of road on both the east and the west flanks. As with the greater part of the village, the majority are late Twentieth or early Twenty-First Century and provide additional urban context to the site.




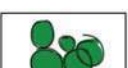


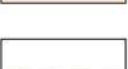
There are a small number of listed buildings within the vicinity of the site. These include Oak Cottage to the south of Hyde Lane and Jaxons Farm to the west of the site. In both instances any historic setting provided by the site has been largely lost by the introduction of modern buildings which have broken or reduced the visual relationship.

A small section of public footpath runs along the western boundary of the site before turning into the yard of Jaxons Farm. This appears to be well used by locals, who also follow an informal path that continues along the western boundary before entering the fields to the north.

Opportunities and Constraints



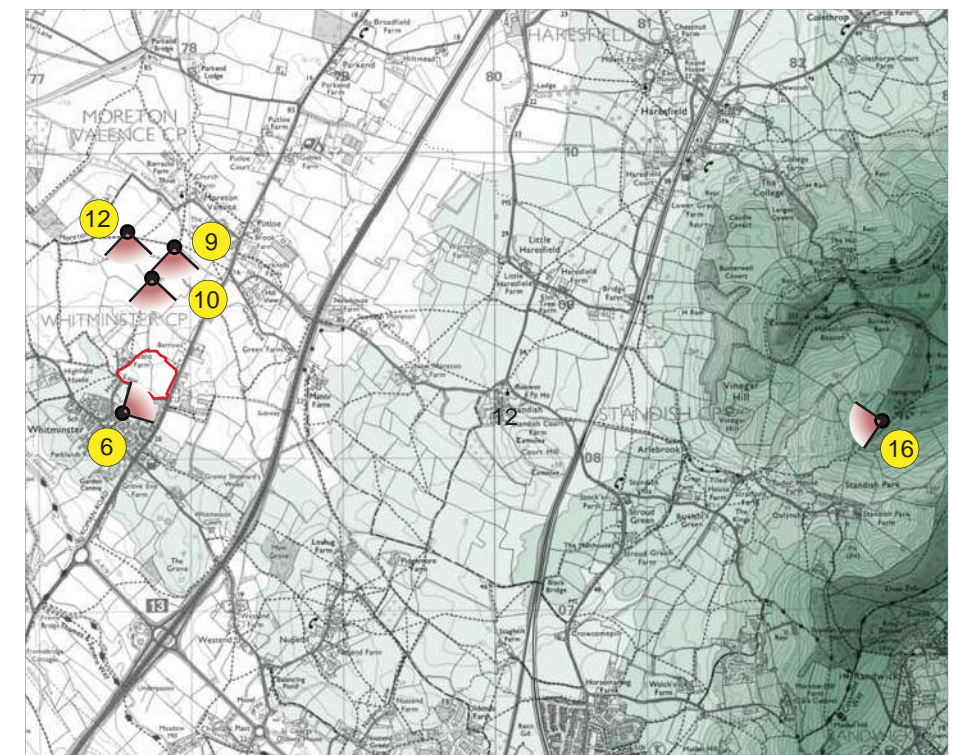
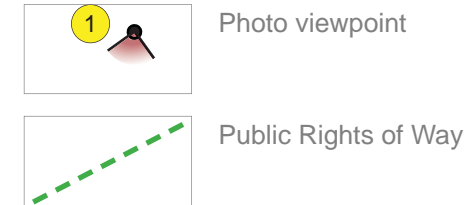
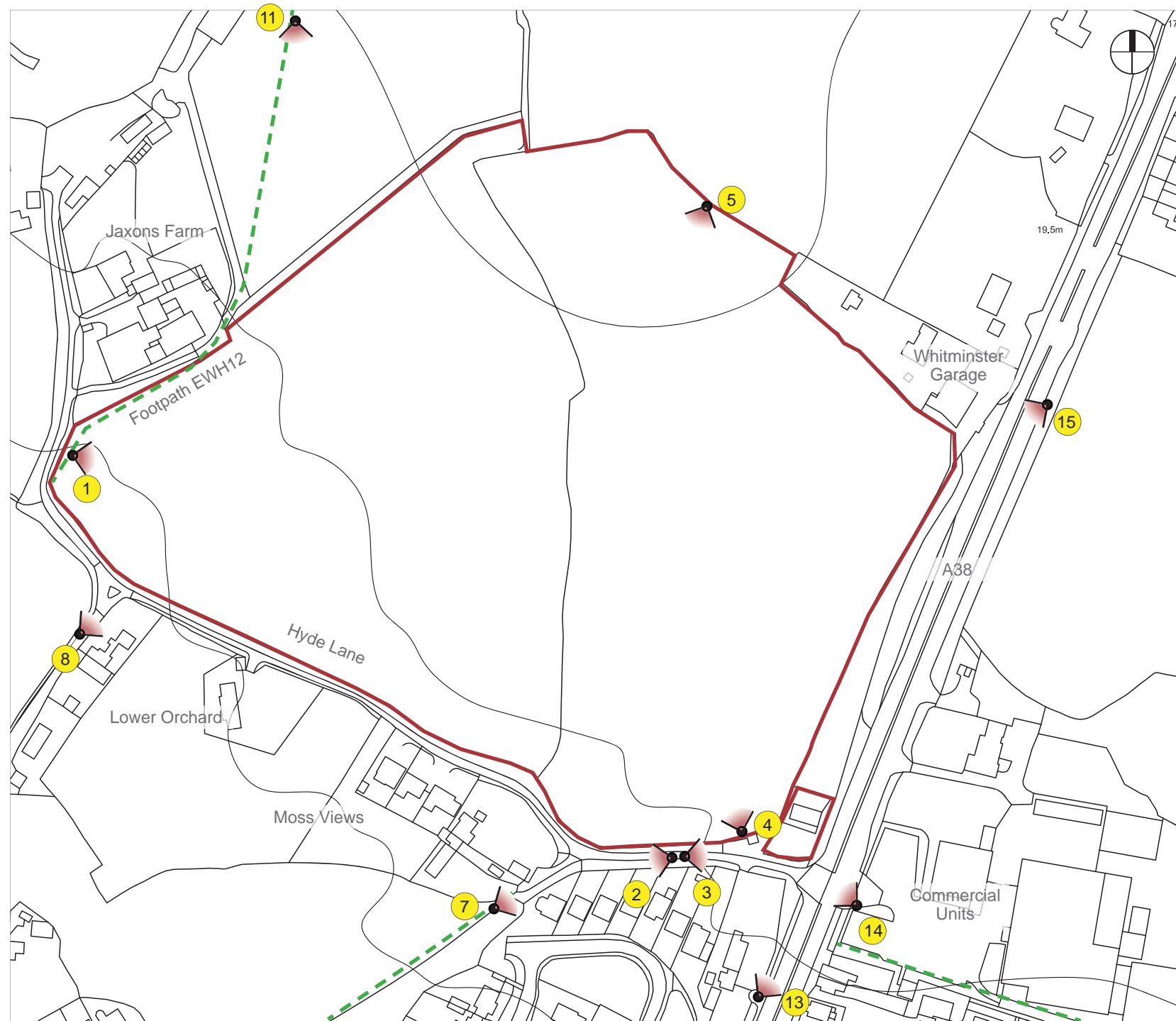
Legend

-  Site Boundary
-  Notable Views
-  Private Views
-  Notable Trees
-  Listed building
-  Urban Form
-  Public Rights of Way

- 1 The A38 is a busy, fast moving dual carriageway which forms both a visual and aural detractor to the character of and views from the site.
- 2 From the site's high point at the western corner there are long views across the Cotswold Escarpment 5km to the east.
- 3 The existing properties along Hyde Lane have been orientated towards the site and the countryside to the north.
- 4 Channelled views are available to those travelling out of Whitminster along Hyde Lane next to the Old Post Office.
- 5 It is assumed that the existing telegraph wires would be re-routed and would not form a constraint to development.

Visual Context

Viewpoint Locations



A narrow belt of trees is located alongside and just to the north of the site's northern boundary. These appear to be quite young and most likely planted within the last thirty years and comprise a wide variety of species including ash, hawthorn, walnut, lime, hazel and field maple. Further to the east, within the field boundary, are a number of mature ash. At the time of writing these do not, as yet, appear to be suffering significant dieback.

The most significant group of trees within and adjacent to the site occupy the long triangular area at the south-east, these mature specimens give a degree of visual containment from views to the south and south-east.

The site plays a role in the setting of the village when approached from the north.

The wider landscape is rural and predominantly given over to large irregular shaped fields which are farmed as arable. While there is little in the way of woodland cover, there are many individual mature trees located within the hedgerow network.

The M5, a detracting visual and aural influence, is located some 750m to the east and there is a weak visual relationship with the site. To the west, the landscape quickly becomes much more tranquil in nature

Visual Context

The site was visited in June 2021 and as such all the photographs in this report illustrate the views in and around the site during the summer when the vegetation is in full leaf; it is acknowledged that during the winter months when the hedgerows have been cut back and the vegetation is out of leaf, views across the site and the wider landscape would be more open.

As previously noted the site sits on low-lying ground within the Severn Vale. Whitminster itself, located to the south, sits on a shallow shoulder of land which, together with the village, precludes any visual relationship with the wider landscape to the south and west. As a result the site's primary visual relationship is with the landscape to the north and east including long views towards the Cotswold Escarpment. The clearest views of the site are from the immediate area and include those from Footpath EWH12 to the south of Jaxons Farm (within the site), the residential properties on Hyde Lane and from the A38.

Viewpoint 1 is located within the site on Footpath EWH12 to the east of Jaxons Farm and illustrates the views available to walkers using this public right of way, which appears to be well used by locals. The view is of a predominantly rural landscape, with an abundance of vegetation containing the lower level elements, but with clear views across the Cotswold Escarpment. The Javelin Park Energy from Waste (EFW) facility is a notable modern element in the wider view. It is possible to discern traffic travelling along both the A38 and M5 for short stretches, but beyond that there are minimal visual detractors.



Viewpoint 1. Looking north-east from Footpath EWH12 (within the site). This is close to the site's highest elevation and illustrates the inter-visibility with the Cotswold Escarpment to the east

Visual Context



Viewpoint 3. Looking west along Hyde Lane adjacent to the site



Viewpoint 3. Looking east along Hyde Lane adjacent to the site



Viewpoint 4. Looking north from within the site adjacent to the southern boundary. Similar, albeit elevated views, would be available from the properties to the south of Hyde Lane.

Views from Whitminster

For the most part there is no visual relationship between the village and the site. However, there are a number of properties situated along the southern side of Hyde Lane which are orientated northwards and overlook the site.

Hyde Lane itself is bounded by a mature hedgerow on its northern side, which channels views along it (as illustrated in Viewpoints 2 and 3) and precludes views into the site for walkers and motorists in the summer months, albeit there may be glimpsed views in winter.

Viewpoint 4 is located within the site adjacent to the southern boundary, and while not a public viewpoint, it helps to illustrate the site's relationship with the landscape to the north. Similar, more elevated views will be available from the private properties to the south of the lane.

This is an attractive rural view, with the abundance of vegetation within the Vale helping to contain low-level views and provide a good deal of visual separation between Whitminster and the hamlet of Moreton Valence 1.2km to the north, albeit clearly views will be more open during the winter months. There are also long distance views to the hills to the

north including May Hill, Hockley Hill and in the far distance the Malverns. Similarly this is an attractive rural landscape with few if any visual detractors.

Viewpoint 5 located on the site's northern boundary, while not a public viewpoint, is included to help demonstrate the existing relationship between the Whitminster's settlement edge and the adjacent countryside, in which the properties generally present an active edge onto Hyde Lane.

Footpath EWH20 crosses a small area of open space to the south of Hyde Lane. As demonstrated in Viewpoint 6 (and Viewpoint 5) there is minimal inter-visibility between the site and this area in the summer months, albeit there may be filtered views in the winter. As the path approaches Hyde Lane the eastern part of the site comes gradually into view as illustrated in Viewpoint 7.

Towards the site's western corner, adjacent to the Old Post Office, Hyde Lane turns sharply to the south to connect with the historic heart of the village. Viewpoint 8 is located adjacent to the Old Post Office looking north towards the site and illustrates the view of the site as it comes into view for those travelling along this stretch. At present this allows channelled views towards the boundary hedge and the wider countryside,

which do not include any urban form. While in summer the boundary hedge largely contains views, in winter more distant views would be available.

While there is no visual relationship between the site and the historic core of the village, the site does provide the setting for the village's modern, northern edge from which there is a clear inter-visibility between the site and the houses facing on to Hyde Lane. Development on the site would inevitably change this setting function and the character of Hyde Lane and a future development strategy would need to consider the interface between the existing and proposed housing in order to provide a sympathetic and well connected extension to the village.



Viewpoint 5. Looking south towards Walton Cardiff from the footpath to south of Newtown (adjacent to the site).

Visual Context



Viewpoint 6. Looking north-east from Footpath EWH20 adjacent to Kidman's Walk (approximately 200m from the site)



Viewpoint 7. Looking north-east from Footpath EWH20 at it approaches Hyde Lane (approximately 45m from the site)



Viewpoint 8. Looking north towards the site from the western spur of Hyde Lane adjacent to the Old Post Office (approximately 30m from the site).



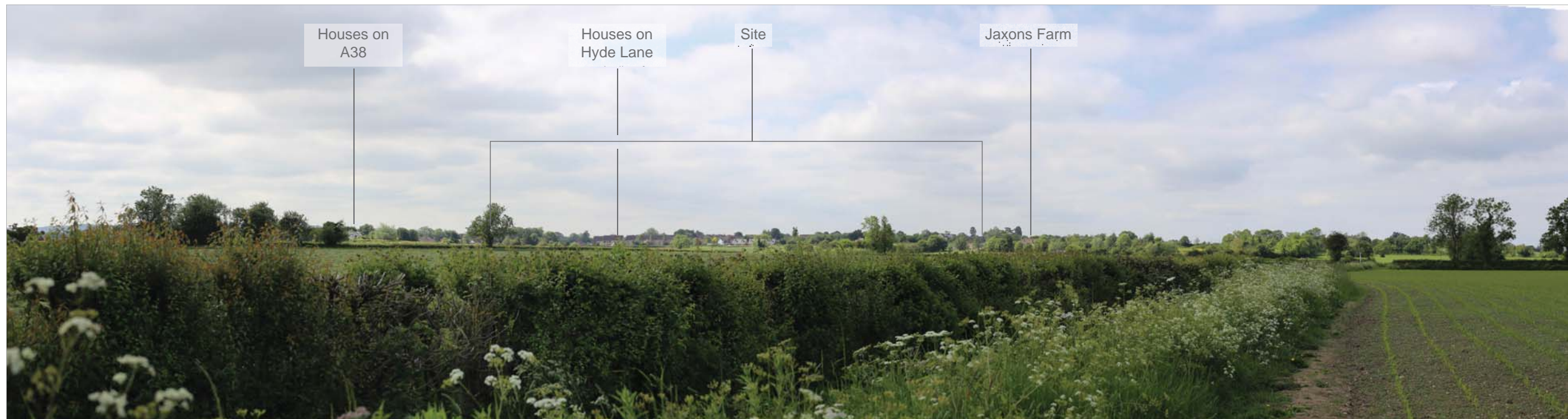
Viewpoint 9. Looking south from Footpath EWH12 to the south of Moreton Valence (approximately 700m from the site)

Views from the Countryside to the north of the site

A complex network of footpaths crosses the landscape to the north of the site between Whitminster and Moreton Valence. While a number of these appear to be well used by locals, several were more difficult to discern or have become overgrown and it is assumed that these are notably less well used.

Footpath EWH12 runs north from the Jaxons Farm and provides the most direct route to the hamlet. Viewpoints 9, 10 and 11 illustrate the sequence of views available to walkers approaching the site from the north as it gradually comes into view. In parts views are precluded by intervening hedgerows and trees and, as the hedges mature over the course of the summer, views will inevitably become less clear. However, similarly, in winter there will inevitably be more open views available towards the site and the northern edge of Whitminster.

Viewpoint 9 is the first in which the site and the properties on Hyde Lane begin to come into view, while by the time walkers reach Viewpoint 10, buildings along the A38 are also visible beyond the site. This demonstrates clearly that any development on the site would potentially be visible from low level viewpoints to the north of the site, and mitigation planting would be required along the northern boundary to help screen and filter views as well as to help retain the perception of a clear separation between Whitminster and Moreton Valence.



Viewpoint 10 . Looking south from Footpath EWH12 (approximately 525m the site).



Viewpoint 11. Looking south from Footpath EWH12 in the field to the north of the site (approximately 140m from the site)

In these views the ridgelines of the housing in the village breaks the skyline in places, but it largely 'softened' by the abundance of trees in and around the village which help to break up the line of the roofs.

The level changes within the site itself is not easily discernible from this orientation.

Viewpoint 11 is located in the field to the north of the site. The trees along the site boundary offer a small amount of screening in summer, but given they are planted as individuals rather than as a structure belt, they would offer very little in the way of containment in the winter months. In light of this any development on the site would be clearly visible from this location and would, in all likelihood, break the skyline. In light of this a robust landscape structure along this boundary would be required to provide an appropriate settlement to countryside interface.



Viewpoint 12. Looking south from Footpath EMV12 (approximately 770m from the site)

The landscape to the north of the site is more open in nature and there are fewer trees, giving rise to longer views across the wider landscape. There are a number of views from across this area and Viewpoint 12 has been selected as being one of the best available.

In this view, while the site itself is not visible, the properties on Hyde Lane are, demonstrating that development on the site would also be. The existing housing sits in the foreground of the Cotswold Escarpment and as such does not break the skyline from this viewpoint and it is reasonable to assume that development on the site would follow suit.

The views from the north of the site are of an open, attractive rural landscape with an abundance of vegetation and few if any visual detractors. While there is not a clear inter-visibility between Whitminster and Moreton Valence in the summer landscape, there are numerous locations along the footpath network in between, in which it is possible to discern the existing houses on Hyde Lane. As such a development strategy coming forward for the site would need to accommodate a robust landscape structure along its northern boundary to help screen views and maintain this separation and provide a considered urban/countryside interface.

Visual Context

Views from the A38

As noted previously the A38 is a very busy, fast moving stretch of road and while numerous people travelling along this stretch would have an opportunity to view the site on a daily basis, views would generally be fleeting.

For those approaching from the south, the site is concealed from view by Whitminster itself until the road nears the junction with Hyde Lane at which point the group of trees in the south-eastern corner comes into view, as illustrated in Viewpoint 13. Any future development on the site would also be visible from this location and would appear as an extension of the existing village.

Viewpoint 14 is located opposite the junction with Hyde Lane. This view, or similar, is available from the properties opposite and to those leaving the commercial units on the eastern side of the road. In summer the site appears well screened by the trees along the A38 boundary, however, there will be filtered views through towards the site in winter. There are also glimpsed views towards the western, more elevated elements of the site adjacent to Jaxons Farm.

In the event of the site coming forward it is proposed that this junction would be upgraded to accommodate the increased traffic flows onto Hyde Lane

For those travelling south, the site comes clearly into view as the road reaches a small crest close to the Whitminster Garage as illustrated in Viewpoint 15. For a short stretch there are open views to the west across the site towards Whitminster and Jaxons Farm. In this view the gently rising nature of the site is more apparent, with the site's high point forming a shallow, tree lined crest in the distance which visually separates the buildings of Jaxons Farm from the village.

For those travelling south this is the introduction to the village, which currently presents an active frontage toward the north, in which the site forms the immediate setting. However, given the busy nature of the road it is considered that it may, in this instance, be more appropriate to introduce a robust belt of structure planting along this stretch to provide a strong sense of separation between any new development and the road.



Viewpoint 13. Looking north along the A38 as it approaches the site.



Viewpoint 14. Looking west towards Hyde Lane and the site from the opposite side of the A28



Viewpoint 15. Looking south-west from the A38 as the site comes clearly into view.



Viewpoint 16. Looking west from the Cotswold Ridge to the west of Standish Wood Car Park (approximately 4.7km from the site)

Views from the Cotswold Escarpment

As illustrated from views within and around the site, there is a clear visual relationship between the Severn Vale and the Cotswold Escarpment.

Viewpoint 16 has been selected as being representative of the many views that will be available along this long stretch of elevated ground. This location is close to the Cotswold Way National Trail, which was being well used on the occasion of the site visit. From this point people are afforded wide, panoramic views across the Severn Vale towards the Forest of Dean in the distance. The view is predominantly rural, albeit there is an awareness of the more active landscape on the lower ground including larger areas of build development and the various road corridors.

While the site is visible from this location, it is difficult to pick out without the aid of binoculars. Nonetheless, it is possible to discern Whitminster and as such there would be an awareness of additional built form, albeit, it would form very small part of a wide panorama. With this in mind it is recommended that building materials are selected that are muted in colour and reflect the local area, and that tree planting is incorporated into the body of site to help soften and assimilate it into its surroundings, including when viewed from elevated viewpoints in the wider area.

Evidence Base

As noted earlier in this document a number of assessments have been undertaken over recent years which have helped to form the Council's Evidence Base.

The Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of the Forest of Dean (May 2020), considers large parcels of land for suitability to accommodate small villages, large villages or towns/cities. The site falls within *Broad Area 9b* which encompasses an area stretching southwards from the Gloucester suburbs to the edge of Stonehouse. This area is further broken up in to individual parcels, which nonetheless cover reasonably large areas. The site and Whitminster fall within *Assessment Area 41* which extends from the south of Whitminster northwards up to Hardwicke Court, the majority of this parcel is identified as *'Potentially Developable Land'* for a New Settlement (see below). In terms of Landscape Sensitivity this area has a sensitivity rating of moderate-high in relation of a small village (1,500-5000 dwellings). Moderate-high is defined as *'The key characteristics and qualities of the landscape are sensitive to change from residential development'*.

The assessment notes:

Key landscape sensitivities:

- *Parkland estate character associated with Hardwicke Court.*
- *Sparsely settled with intact rural character (away from major roads).*
- *Important historic features including the grade I Listed Church of St Stephen in Moreton Valence and a scheduled moated site.*

As such, landscape sensitivity is high for the largest development option size, as the key characteristics and qualities of the landscape may be highly sensitive to development at this scale. Landscape sensitivity is reduced to moderate-high for smaller development sizes as the key characteristics and qualities of the landscape are potentially less sensitive to development at this scale.

However, given the scale of the areas being assessed and the size of development being considered by the report in relation to the circa. 200 dwellings which might be accommodated on the site, the finer grained Stroud District Sensitivity Assessment (December 2016), is considered more relevant. This considers Whitminster in detail and assesses a number of parcels of land in and around the village. The site occupies the greater part of Parcel Wh05 as illustrated on the opposite page.

Parcel Wh05 is judged to be of high/medium sensitivity in relation to potential housing development. This is defined as follows:

Landscape and/or visual characteristics of the land parcel are vulnerable to change and/or its values are medium through to high. It may be able accommodate the relevant type of development but only in limited situations without significant character change or adverse effects if defined in the relevant land parcel summary. Thresholds for significant change are low.

In the Wh05 Sensitivity to Housing Use summary the assessment states:

The sensitivity of the area lies in its openness and location on the slopes of the low ridge forming part of the skyline north of the settlement which leaves it open to view from the north and north-east, its separation from the main part of the settlement in open countryside and its trees, particularly adjacent to the A38. Its value lies in the Roman Road which runs alongside the A38 and in the PROW which runs alongside the north western boundary. Housing development would be highly visible acting as a major extension to the settlement to the north in open countryside with very limited connection to the main part of the settlement.

While the site itself forms the part of the setting of the village when viewed from the A38, from the majority of other viewpoints to the north and north-east it is difficult to discern the fields themselves, but rather it is the existing modern properties which over look Hyde Lane, which catch the eye. Similarly, while it forms a small part of the skyline to the north of the settlement, the greater part of the skyline is formed by the houses and vegetation within the village and the trees located to the west of the site.

With regard to value it cites the Roman Road and the PROW running along the north-western boundary. The Roman Road sits outside the site and is largely occupied by a wide lay-by off the A38 and as such would

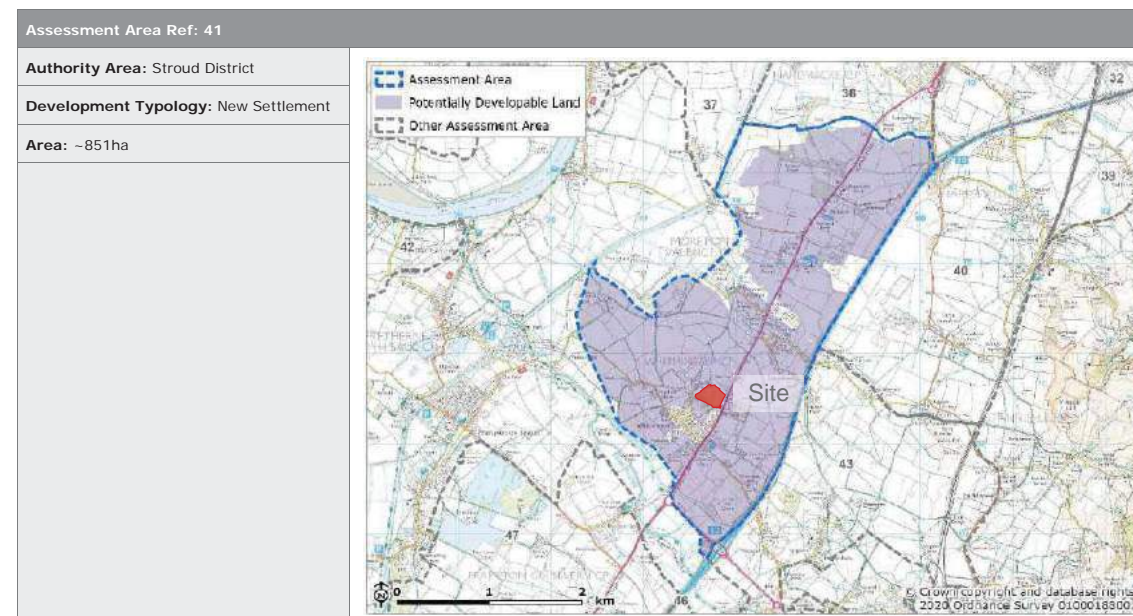
not be affected by the development proposed for the site. The PROW runs for a short stretch along the north-western boundary and could easily be accommodated into a future development strategy, indeed it would be an asset to be able to provide a link directly to the footpath network to the north.

With regard to linkages to the village, Hyde Lane runs directly southwards towards the heart of the village and there is also an opportunity to connect to footpath EWH20 opposite the site, which connects with Kidman's Walk and on towards the village centre.

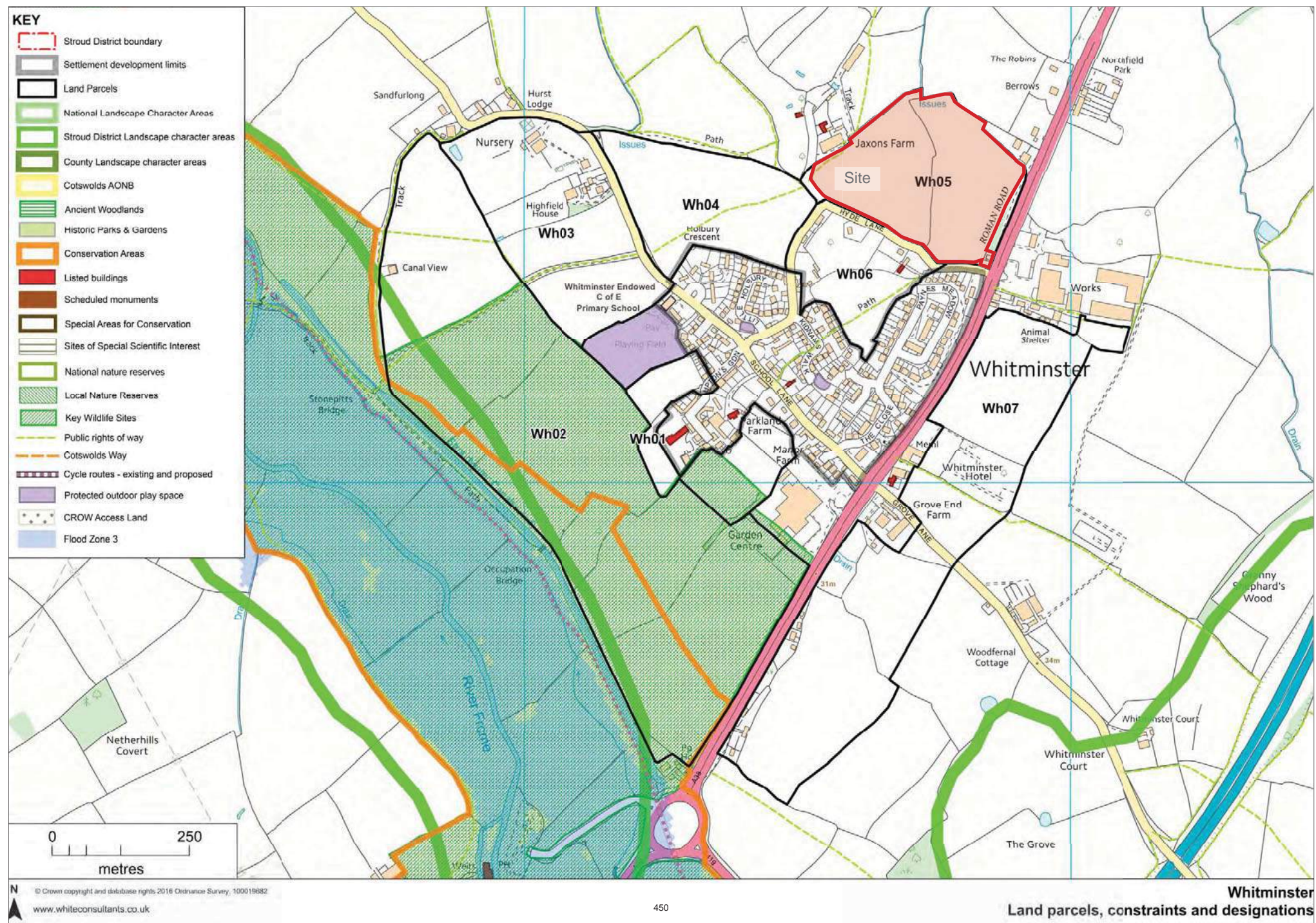
The site has limited landscape features. The group of mature trees in the south-eastern corner which help to screen the site from this area would be retained. Similarly the greater part of the hedgerow network running around the and through the site would be retained and reinforced providing a strong green infrastructure network.

Given the low-lying nature of the site, it is judged that it has the capacity to accommodate meaningful landscape buffers around its perimeters which could successfully mitigate visual effects from the north and north-east. The proposed landscape strategy would also incorporate areas of open space and linkages to both the village and the wider area. With this in mind, it is judged that this site could accommodate housing development and any adverse landscape and visual effects would be concentrated on the site itself and would not extend beyond the immediate locality.

Assessment Area 41 – New Settlement: South of Gloucester (West of M5, A38 corridor)



Extract from *The Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of the Forest of Dean (May 2020)*



Extract from The Stroud Landscape Sensitivity Study (December 2016)

Landscape Development Strategy and Emerging Masterplan

The Landscape Development Strategy on the opposite page, suggests how development might be sensitively introduced onto the site responding to the landscape and visual constraints identified.

As previously noted the site's primary visual relationships are with the landscape to the north and east. In light of this it is proposed to introduce a robust belt of structure planting around the site's northern and eastern boundaries. While in many ways it would be preferential to present an active frontage onto the A38, it is considered that in this instance it may be more appropriate to incorporate a robust belt to structure planting that would help to screen and separate the road from the development.

Access would be via the upgraded Hyde Lane/A38 junction, which would prioritise access into the site with a new, dedicated turn rejoining the existing lane.

Housing would be orientated to provide an active frontage onto Hyde Lane, which would wrap around to the north in order to overlook the proposed area of open space which would occupy the western corner of the site.

This area would retain the line of the existing public right of way and would also help to maintain a visual connection with the lane as it runs alongside The Old Post Office with the Landscape to the north. Tree planting in this area would help to form a backdrop to the proposed housing in the long term thus helping to soften any skyline views from the east.

It is proposed to retain the hedgerows around and within the site, albeit, it is acknowledged that breaks will need to be made through these in order to provide connectivity both within the site and with the existing village to the south. The hedgerow that runs through the centre of the site would be retained within a wider 'green' margin which could also accommodate pedestrian routes through the site.

The site's low point is close to its northern boundary and, as such, would be the likely location for any SuDS attenuation area. Situated next to the landscape buffer of the northern boundary this provides an opportunity to achieve biodiversity enhancements as well as an attractive area of public open space to server the scheme.



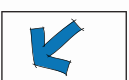
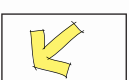
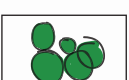


The existing village includes numerous groups of trees in areas of incidental open space as well as within the gardens of private properties. This does much to soften the ridgelines of the houses and assimilate the village into its wider surroundings. As such it is proposed that tree planting is incorporated throughout the site as well as around its perimeter. This would also help to assimilate the scheme into the wider landscape when viewed from more elevated locations including along the Cotswold Escarpment.

It has been assumed that the existing telegraph wires running across the site would be diverted as required and do not present a constraint to the configuration of the development.

Landscape Development Strategy



Legend

-  Site Boundary
-  Development Cells
-  Vehicular Access
-  Pedestrian Links
-  Trees
-  Proposed Buffer Planting
-  Public Rights of Way

- 1 Proposed access off upgraded junction with the A38
- 2 A robust landscape buffer to be incorporated along the site's northern boundary to help screen views from the landscape to the north.
- 3 Given the detracting nature of the A38 it is proposed to incorporate a landscape buffer to act as a visual screen. There would also be the potential to incorporate an acoustic barrier if required.
- 4 Central hedge through site retained, with breaks as necessary to facilitate connections between development cells. Hedge to be retained in wider open margin to accommodate pedestrian links and planting.
- 5 Area of open space at site's high point would allow retention of visual connection to countryside from Hyde Lane looking north and would allow for tree planting to form skyline beyond houses in the long term.
- 6 SuDS attenuation would be located along the northern boundary close to the site's low point.
- 7 Opportunity for pedestrian connection to village centre.

Summary

This preliminary landscape and visual report has been prepared on behalf of Redrow Homes Ltd in relation to the potential for residential development on Land at Hyde Lane, Whitminster (the site).

Stroud District Council is currently in the process of reviewing the current Stroud District Local Plan, the Pre-Submission draft of which was made public on 29th April 2021. The council is accepting representations in regard to this draft up to 7th July 2021 and this forms part of a submission by Redrow Homes with regard to this site.

The Pre-Submission Draft has drawn on a wide evidence base and concluded that in relation to landscape sensitivity *'the preferred directions of housing growth in landscape terms are to the northeast and northwest'*.

The Richards Partnership visited the site in June 2021 to undertake an assessment of the landscape character of the site and the surrounding area and the role that it plays in the visual amenity of views in the surrounding area.

The site sits within the relatively flat landscape of the Severn Vale and is located adjacent to the busy A38 immediately to the north of Whitminster and approximately 5km to the south of Gloucester. It comprises two fields which are currently managed as arable. The boundaries are formed by

mature agricultural hedgerows. While there are numerous mature trees in the surrounding landscape, there are none within the main body of the site and few along its boundaries.

Whitminster sits on a shallow shoulder of land which, together with the village itself, precludes the site having a visual relationship with the landscape to the south. As a result of the topography and the vegetation in the surrounding area, its primary visual relationship is with the landscape to the north and the east, including the Cotswold Escarpment which is located approximately 5km to the east.

In light of the findings of this landscape and visual report, a Landscape Development Strategy has been produced which illustrates how development might be brought forward onto the site, which responds to the opportunities and constraints, and which would knit successfully onto the existing village while also providing a responsible settlement/countryside interface.

The Richards Partnership
June 2021





APPENDIX F
HERITAGE ASSESSMENT

LAND OFF HYDE LANE, WHITMINSTER

Built Heritage Assessment



JCH01423
Land off Hyde Lane,
Whitminster
V.1
June 2021

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1 INTRODUCTION

- 1.1 This Built Heritage Assessment has been researched and prepared by RPS Consulting Services UK Ltd, on behalf of Redrow Homes Limited for the Site to the north of Hyde Lane, Whitminster (hereafter referred to as 'the Site'). This Built Heritage Assessment assesses the significance of Built Heritage Assets that have the potential to be affected by the development of the Site and provides relevant heritage led design advice to avoid and minimise any potential harm. This draft report will be updated to incorporate an assessment of the impact of the proposed development on the significance of the relevant Built Heritage Assets following the finalisation of the development proposals.
- 1.2 Due to the long reaching views from the Site to the north, a 1.5km search radius was initially used to identify Built Heritage Assets that have the potential to be affected by the proposed development. A number of these built heritage assets have been discounted from detailed assessment as the Site, by lacking any meaningful visual or functional relationship with them, does not form a part of their setting. Where the Site does not form a part of the setting of a Built Heritage Asset, the proposed development is considered to have no potential to affect its significance.
- 1.3 This report makes reference to the relevant legislation contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and both national and local planning policy. In addition, relevant Historic England guidance notably The Setting of Heritage Assets (Dec. 2017) has been consulted to inform the judgements made. Relevant information, including the listing citations for the relevant heritage assets have also been consulted in preparing this Built Heritage Statement. The conclusions reached in this report are informed by desk based research, a walkover survey of the Site and publicly accessible locations in the surrounding area, a historic map progression exercise and the application of professional judgement. The Site was visited in June 2021 when weather conditions were clear, allowing for a full appreciation of the Site and the surrounding area.
- 1.4 This report recognises that the Site makes some contribution to the significance of some listed buildings, notably Jaxon's Farmhouse, Oak Cottage and The Church of St Stephen. In all cases this contribution is secondary to the interest derived from the fabric of the buildings themselves. It is considered that there is the potential for some harm to the significance of some heritage assets through the development of the Site, which can be minimised through careful design.
- 1.5 The findings of this report are based on the known conditions at the time of writing and all findings and conclusions are time limited to no more than 3 years from the date of this report. All maps, plans and photographs are for illustrative purposes only.

2 LEGISLATIVE AND PLANNING POLICY FRAMEWORK

- 2.1 The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

Legislation

- 2.2 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.3 The relevant legislation in this case extends from section 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting.
- 2.4 The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.
- 2.5 The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give '*considerable importance and weight*' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, February 2019)

- 2.6 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.
- 2.7 It defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.
- 2.8 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are '*an irreplaceable resource, and should be conserved in a manner appropriate to their significance*'.
- 2.9 For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.
- 2.10 Under '*Considering potential impacts*' the NPPF emphasises that '*great weight*' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact

equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.

- 2.11 Paragraph 195 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.
- 2.12 Paragraph 197 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.

National Guidance

Planning Practice Guidance (DCLG)

- 2.13 The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.
- 2.14 Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

Overview: Historic Environment Good Practice Advice in Planning

- 2.15 The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. *GPA1: The Historic Environment in Local Plans* provides guidance to local planning authorities to help them make well informed and effective local plans. *GPA2: Managing Significance in Decision-Making* includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. *GPA 3: The Setting of Heritage Assets* replaces guidance published in 2011. These are complemented by the Historic England Advice Notes in Planning. Of these, GPA2 and GPA3 are of particular importance in this case and a further description of these follows.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

- 2.16 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:
1. Understand the significance of the affected assets;
 2. Understand the impact of the proposal on that significance;

3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition; December 2017)

- 2.17 This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.
- 2.18 As with the NPPF the document defines setting as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'*. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 2.19 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.
- 2.20 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 2.21 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.
- 2.22 Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:
1. Identify which heritage assets and their settings are affected;
 2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
 3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;

4. Explore ways to maximise enhancement and avoid or minimise harm; and
5. Make and document the decision and monitor outcomes.

HEAN12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)

- 2.23 The purpose of this advice note is to provide information on how to assess the significance of a heritage asset. It also explores how this should be used as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).
- 2.24 Historic England notes that the first stage in identifying the significance of a heritage asset is by understanding its form and history. This includes the historical development, an analysis of its surviving fabric and an analysis of the setting, including the contribution setting makes to the significance of a heritage asset.
- 2.25 To assess the significance of the heritage asset, Historic England advise to describe various interests. These follow the heritage interest identified in the NPPF and PPG and are: archaeological interest, architectural interest, artistic interest and historic interest.
- 2.26 To assess the impact to the significance of a heritage asset Historic England state that it is necessary to understand if there will be impacts to built fabric or the setting of a heritage asset and how these contribute to the heritage asset's overall significance. Where the proposal affects the setting, and related views, of a heritage asset, or assets, it is necessary to clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated.
- 2.27 This enables an assessment of how proposals will affect significance, whether beneficial or harmful. It also states that efforts should be made to minimise harm to significance through the design process, with justification given to any residual harm.

Local Planning Policy

- 2.28 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.
- 2.29 Local Planning Policy is currently prescribed by Stroud District Council through the Stroud District Council Local Plan (Adopted November 2015). Policies relevant to this proposed development comprise:

Delivery Policy ES10 -Valuing our historic environment and assets

Stroud District's historic environment will be preserved, protected or enhanced, in accordance with the principles set out below:

1. *Any proposals involving a historic asset shall require a description of the heritage asset significance including any contribution made by its setting, and an assessment of the potential impact of the proposal on that significance, using appropriate expertise. This can be a desk-based assessment and a field evaluation prior to determination where necessary and should include the Gloucestershire Historic Environment Record.*
2. *Proposals and initiatives will be supported which conserve and, where appropriate, enhance the heritage significance and setting of the Districts heritage assets, especially those elements which contribute to the distinct identity of the District.*

These include:

- a. *the 68 sites of national archaeological importance (which are designated as Ancient Monuments), any undesignated archaeology of national significance, and the many buildings that are Listed as having special architectural or historic interest*
 - b. *the stone, bronze, iron age and roman settlements and remains; the medieval settlements including Berkeley Castle; historic houses; historic parks; gardens and villages*
 - c. *the townscapes of the larger towns such as Stroud where the industrial heritage influenced its historic grain, including its street layouts and plot sizes*
 - d. *the District's historic market towns and villages, many with designated conservation areas, such as Berkeley, Wotton Under Edge, Minchinhampton, Painswick and Dursley.*
3. *Proposals will be supported which protect and, where appropriate, enhance the heritage significance and setting of locally identified heritage assets, such as buildings of local architectural or historic interest, locally important archaeological sites and parks and gardens of local interest.*
 4. *Proposals will be supported which protect and, where appropriate, enhance key views and vistas, especially of the spires and towers of historic churches and mills.*
 5. *Any harm or loss would require clear and convincing justification to the relevant decision-maker as to why the heritage interest should be overridden.*

A full programme of work shall be submitted with the application, together with proposals to mitigate any adverse impact of the proposed development, and where appropriate, be implemented through measures secured by planning condition(s) or through a legal agreement.

3 HISTORIC BUILT ENVIRONMENT APPRAISAL

Introduction

- 3.1 The Site is located to the north of the village of Whitminster, in Stroud District. The Site is irregular in shape and is c.7.7ha in size. It is currently made up of two separate fields which are separated by established hedgerow. These are in agricultural use, with crops growing within them. The Site is bordered by dense hedgerow which from locations immediately adjacent to the Site blocks views into it. Immediately to the south-west of the Site is Hyde Lane. To the south-east is the A38 which is a busy road connecting Gloucester and Bristol. To the north-east of the Site are further fields in agricultural use. To the north-west of the Site is Jaxons Farm, with a large agricultural building largely blocking views to the Listed Jaxons Farmhouse.
- 3.2 The Site rises to the south-western corner of the Site, with this sitting at c.26m AOD (Above Ordnance Datum). The lowest part of the site, to the north is at c.14m AOD. This rising land allows for some views across to the north of the Site, towards Moreton Valence and to the hills beyond. Access to the Site is within the western corner, where a public footpath entry is concealed within the hedgerow. To the west there is also a vehicular access point.



Plate 1: View of the Site looking South to Hyde Lane

Historic Development

- 3.3 The parish of Whitminster was formerly called Wheatenhurst. Victoria County History (VCH) advises that the “*name of the parish has been misused and needs explanation: Wheatenhurst is a reasonable rendering of the early forms of the name, in which the first element is either the personal name Hwita or the word meaning 'white' and the second element indicates a wooded hillock, but the corrupted form Whitnester or Whitmister was altered by popular etymology in the*

16th or 17th century to Whitminster. In 1945 it was decided to use Whitminster officially. The Gloucester to Bristol road (now known as the A38) has markedly altered how the parish has evolved with development evolving around the road and away from the historic centre of the settlement further west. This road in itself was a Roman road leading to the Roman settlement of Glevum (now Gloucester). The historic settlement, some distance to the west still retains the Wheatenhurst name with the development around the A38 being referred to Whitminster.

- 3.4 In the seventeenth century Whitminster was described as “a small village of good accommodation for travellers on the main road” (VCH). A wholesale redevelopment in the village in the twentieth century means that there “are very few ancient houses in the village” (VCH). Aside from the tourist trade the parish is largely agricultural though with historic evidence of milling (including corn, paper and fulling mills) but also industry associated with the Stroudwater Canal. This canal opened in the late eighteenth century and supported other industries including shipwrights and coal merchants.
- 3.5 The 1838 Tithe Map (Fig 3) for the area shows the Site divided with the same field boundaries as exist today. The Site is shown as being in the same ownership and tenancy as Jaxons Farmhouse. Jaxons Farm and Kings Orchard both lie to the north-west of the Site and Oak Cottage to the south. The cottage at this time appears to be part of a longer range of buildings, as is described in the Historic England Listing Description (see below).
- 3.6 The 1883-4 OS map (Fig 4) shows little has changed since the Tithe map. Much of the landscape to the south-west is shown as being orchards. Oak Cottage appears to be shorter in length, suggesting that between the Tithe Map and this map it was divided. It still appears as two separate cottages.
- 3.7 The 1922-3 OS map (Fig 5) shows that there are no significant changes to the Site or surrounding area at this time and even by the 1972 OS Map (Fig. 6) there are no clear changes to the Site or the surrounding area.
- 3.8 By the 1975 OS map (Fig. 7) development has spread to the south of the Site, with properties beginning to spread along Hyde Land to the south of the Site. Oak Cottage is still comparatively separated from the rest of built development. The Site is in the same layout as currently, although with an extra field boundary running in the western field.
- 3.9 The 2021 OS map shows that the field boundary has returned to the previous (and current) layout. The properties to the south of the Site running to the west of Oak Cottage have been constructed. There are no other significant changes surrounding the Site.

Assessment of Heritage Assets

- 3.10 There are three listed buildings which sit in close proximity to the Site. These are Jaxons Farmhouse, Kings Orchard and Oak Cottage, all Grade II listed. These have the potential to be impacted by the development of the Site and so are considered below.
- 3.11 The topography of land surrounding Site, and the edge of settlement location, means that there are views out from the Site to the north, towards some listed buildings in Moreton Valence. These are just over 1km away, and in most instances any glimpses of these properties provide no understanding of their historic and architectural interest. In return views the Site is not visible from ground level, but there are possibly some views from the upper storeys (although this could not be confirmed on the Site visit due to lack of internal access to these properties). The Site in these views will form a small part of the wider rural landscape, with any views forming only glimpses. It is therefore considered that in most instances the Site does not make any meaningful contribution to the understanding of the assets. The exception to this is St Stephens Church in Moreton Valence. From part of the Site the tower of the Church is clearly visible and there is an understanding of the historic interest of the asset. This is therefore considered below.

- 3.12 There are some further listed buildings to the south-west of the Site in Whitminster, which share no functional or visual connection with the Site, and have therefore been discounted from further study.
- 3.13 The Stroud Industrial Heritage Conservation Area lies to the south-west of the Site, approximately 720m at the closest point, however there is no appreciation or understanding of the Conservation from the Site, and the Site makes no contribution to the significance of the Conservation Area. It has therefore been discounted from further discussion.
- 3.14 The heritage assets which have the potential to be impacted and are therefore discussed below are:
- Jaxons Farmhouse (Grade II, National Heritage List Number: 1340372)
 - King's Orchard (Grade II, National Heritage List Number: 1303065)
 - Oak Cottage (Grade II, National Heritage List Number: 1091305)
 - Church of St Stephen (Grade I, National Heritage List Number: 1340346)

Jaxons Farmhouse (Grade II, National Heritage List Number: 1340372)

- 3.1.1 **Description:** Jaxons Farmhouse is a Grade II listed building which was first designated in 1986. It lies approximately 55m from the closest part of the Site. The building is heavily screened from publicly accessible locations, however glimpses of it are possible. The asset originally dates to the late sixteenth century, and the listing description states that it was possibly originally timber framed but is now faced in brick. The plan of the building is a single pile building with a projecting extension at the rear, located at the north of the property. It is two storeys and attic. The building has a mansard slate roof, which is hipped at the left and gabled at the right. The rear projecting wing has a tiled gabled roof. The property has two chimney stacks on the main range, one located on the right gable and one sitting centrally on the ridge, both of which are constructed in brick. The fenestration across the building is principally timber casements, and there is a twentieth century vertical battened door between with gabled porch hood (as described in the listing description).
- 3.1.2 **Setting:** The immediate setting of the listed building is made up of the residential garden within which it is located, in addition to the farm buildings located to the south-east. The garden shows the domestic character of the asset, and contributes to it aesthetically, providing a secluded and tranquil immediate setting. The farm buildings demonstrate the supporting role the house played to the agricultural functions and help to demonstrate the historic nature of the property. The distinct separation of the farmhouse from the barns shows a divide between the functions of these buildings and allows for an understanding of the farmhouse as a more formal dwelling. This immediate setting therefore makes a positive contribution to the asset.
- 3.1.3 The wider setting is made up of the rural agricultural landscape which surrounds the asset, and a large part of this is made up of the Site. This landscape allows for the building to be seen within its original rural, agricultural context and makes a positive contribution to the significance of the building, albeit secondary to the interest derived from the fabric of the building itself. The Site was also under the same ownership as the farmhouse as shown on the Tithe Map of 1838, which provides a clear functional relationship. From the Site there are only glimpsed views available of the farmhouse, with it largely obscured by the large agricultural building between the two. From the Site it is possible to recognise some of the architectural and historic values of the asset. The site makes a positive contribution to significance of Jaxons Farmhouse.
- 3.1.4 **Significance and setting Summary:** The Significance of Jaxons Farmhouse is principally derived from the architectural and historic special interest, which is embodied within the fabric of the building. The building has a high level of architectural interest, with it representing a farmhouse

from the sixteenth century, albeit heavily altered. These alterations in themselves demonstrate the historical interest, with farmhouse architecture evolving to become more formal, with brick replacing the timber frame. The building also derives interest from its setting, with the immediate setting making a contribution to the overall significance through placing it within an isolated context. The wider setting, much of which is made up of the site, also makes a positive contribution to the significance, through demonstrating the connection between the farmhouse and the agricultural land, and through providing an isolated and tranquil location. The Site therefore makes a positive contribution to the significance of the listed building, but this is secondary to the interest embodied within the fabric of Jaxons Farmhouse itself.



Plate 2: Side view of Jaxon's Farmhouse from Hyde Lane

King's Orchard (Grade II, National Heritage List Number: 1303065)

- 3.15 **Description:** King's Orchard is entirely hidden from view from publicly accessible locations, with no glimpses of it possible, particularly in the summer months when the Site Visit was carried out. This description is therefore entirely based on the listing description provided. The building is located approximately 90m from the Site at the closest point. The building is an early seventeenth century building which was first designated in 1986. It is a small detached dwelling that was enlarged to the rear in the twentieth century, creating a 'T' shaped building. The building has square panel timber framing with rendered and painted brick infill. This is set on a stone and brick plinth. The twentieth century extension to the rear is constructed in brick with a tile roof. The original range is two storeys and attic in height. The south facing front of the building has a central shingled gable with projective eaves. The fenestration is principally made of diamond timber mullions of varying sizes. The door is a studded timber plank door. The right-hand gable has been refaced in brick, and the left hand gable end has 3 oriel windows, and a timber diagonal and

downward curving braces visible. The attic has an altered oriel window, and there is a further three-light square oriel on the first floor over the ground floor canted window.

- 3.16 **Setting:** The immediate setting of the listed building is made up a residential garden, which is mostly laid to lawn, and surrounded by dense mature trees. This immediate setting provides a secluded setting for the listed building and contributes to the isolation of the building, which adds interest as an isolated rural building. The wider setting is made up of the surrounding landscape of agricultural land, which includes some other rural properties. This wider setting also includes the Site. The wider setting allows for an understanding of the property as an isolated dwelling when travelling along Hyde Lane towards the asset, but otherwise makes little contribution, given the inwards facing nature of the asset. The Site itself does not make any legible contribution to the overall significance of King's Orchard.
- 3.17 **Significance and Setting Summary:** The significance of King's Orchard is principally derived from the architectural and historic special interest which is embodied within its built fabric. It has architectural interest from the age of the building showing building construction methods in the seventeenth century, with the timber frame representing the rural vernacular at this time. The immediate setting contributes in part to this interest through providing an isolated and secluded location. The wider setting makes very little contribution to the asset as it shares no visual or functional connection with the wider setting. The Site in particular makes no meaningful contribution to the overall significance of the listed building.

Oak Cottage (Grade II, National Heritage List Number: 1091305)

- 3.18 **Description:** Oak Cottage was designated as a Grade II listed building in 1986. It is located approximately 40 meters to the south-west of the Site at its closest point. The building dates to the seventeenth century and is a small detached cottage. The listing description states that it was formerly probably part of a row called Martins Row. The building is constructed in square panel timber framing with rendered infill. The roof is gabled and covered with double Roman tile roof. Oak Cottage has one gable end brick chimney stack at the right, and one ridge stack to left of centre. The plan of the building is set out over a single long range, which is single storey and attic. Within the attic two dormers sit on the eaves. The majority of the windows are small timber casements. To the right of the front elevation there is a glass panelled and to the left there is a twentieth century door set within a gabled porch.
- 3.19 **Setting:** The immediate setting of the asset is made up of the small residential plot on which it is located. To the front elevation the main garden is laid to lawn, and this is fairly secluded due to high fences and tree planting. This immediate setting allows for a degree of separation from the asset and other nearby modern buildings. The wider setting is made up of the surrounding buildings and also the wider agricultural landscape. The building would once have stood in comparative isolation, and this would have made it distinct from the other properties in the area. In the late twentieth/ early twenty-first centuries increased development in proximity to the property has impacted on its isolation. Whilst the Site would have once contributed more to the significance of the listed building the residential buildings which now surround Oak Cottage serve to sever it from the surrounding landscape. In addition, the asset is orientated away from the Site and views of the asset from the Site are limited to glimpses of the roofscape. The Site does allow for some understanding of the historic rural location of the asset however any contribution that it makes to the significance of the listed building is very limited.
- 3.20 **Significance and Setting Summary:** The historical and architectural special interest of Oak Cottage is embodied within its built fabric, and this is the main contributor to the overall significance. The asset has a high degree of architectural value and represents an example of seventeenth century rural vernacular architecture. There is the potential for the building and its site to provide further interest in regard to the other cottages which were once attached to this one. The setting of the building makes very little contribution to the overall interest, particularly the wider

setting which is largely physically and visually divorced from the asset. The Site therefore only makes a very limited positive contribution to the overall significance of Oak Cottage.



Plate 3: Oak Cottage from Public Footpath

Church of St Stephen (Grade I, National Heritage List Number: 1340346)

- 3.21 **Description:** The Church of St Stephen is a Grade I listed building which is located approximately 1.1km to the north of the Site. It was first listed in 1955. The nave and chancel of the church date to the twelfth century, with the tower being fifteenth century, and the south aisle late fifteenth/early sixteenth century in date. The church was restored in 1880-84. The building is constructed from coursed and dressed stone, with chamfered plinths to the aisle and to the tower. The building is covered with a slate roof and has coped verges with cross finials. The plan of the building is a west tower, a nave with a north porch, and a chancel. A south aisle runs the entire length of the Church. The tower is three stages with dividing string courses. There are stepped diagonal buttresses up to the second stage. The parapet is embattled, with gargoyles. On the final stage there are two-light decorative louvred belfry openings with ogee heads. Within the western side of the tower there is a pointed arch door and 2-light ogee over. The north gabled porch has a timber framed front and an inner Norman doorway with roll-moulded arch on jamb shafts, with raised capitals. The lintel is scalloped and has a zig-zag decorative pattern, with a tympanum above showing scenes of Archangel Michael fighting with a dragon. Within the porch there are small squints to either side with stone wall seats below. To the east of the porch there is a large four light Perpendicular window with a square hoodmould. Beyond this there is a pointed chamfered arch for a priest's door and a small Norman Lancet. A large fourteenth century three-light window is in the east side of the chancel. The south aisle has three three-light Perpendicular windows to the south side, as well as similar ones in the east and west ends. There is a Tudor arched cavetto moulded doorway between bays one and two on the south side, with enriched spandrels and a square hoodmould.

There are a number of features of interest internally within the Church, however these are not connected in any way to the Site so are not described further here. The list description describes these.

3.22 **Setting:** The immediate setting of the Church of St Stephen is made up of the churchyard within which it is located. There are a number of separately listed structures within this immediate setting. This allows for an understanding of the asset within its original location and makes a positive contribution to the overall significance of the Church. The wider setting covers a wide expanse due to the Church being designed to be seen from the surrounding landscape. In close proximity to the Church is the scheduled moated Site, and this makes a clear contribution to the significance and understanding of the Church, with these clearly having been located in close proximity to one another intentionally. The nearby buildings also contribute to the understanding of the asset as these are the buildings which the Church was built to serve. The wider setting extends to the surrounding landscape, where views of the tower allow for an understanding of the historical importance of the Church within the community. From some parts of the Site there are glimpses of the Church tower, and the clear architectural and historic interest of the asset can be seen from the Site. From the Church looking back to the Site there is no understanding of the Site specifically, with no clear views of this part of the landscape. The site therefore only makes a negligible positive contribution to the significance of the Church of St Stephen.

3.23 **Significance and Setting Summary:** The significance of the Church of St Stephen is principally derived from the architectural and historic special interest embodied within its built fabric. The changes made to the Church historically show the increasing importance of the Church, but also the changes in Church architecture over this time. Aesthetically the Church possesses a high level of interest, with it being an attractive example of Church architecture. The setting of the church makes a degree of contribution to the significance of the asset, however the Site as part of this makes only a negligible contribution to the overall significance, through being a very small part of the wider landscape from where the Church can be experienced.



Plate 4: Church of St Stephen

4 DESIGN ADVICE

- 4.1 There are currently no proposals in place for the development of the Site, with design development being at an early stage. This report will be updated to assess the impact of proposals on the built heritage assets described above once the designs have been further formulated. This section of the report is therefore dedicated to providing some design advice which would help to minimise the potential for harm to the heritage assets.
- 4.2 Development of the site will likely have a degree of impact on the assets above. Assuming a high degree of design quality, a proportionate residential scheme that reflects the existing built context and semi-rural edge of settlement character of the Site could likely be achieved without incurring substantial harm to the significance of relevant built heritage assets. Any harm will be weighed against the public benefits of the proposed development in line with the NPPF. There are some areas of mitigation which would lessen the potential harm and these are set out below. Measures to avoid and minimise harm should be embedded within the evolution of any masterplan and further developed in detail as part of a future application for the development of the Site.
- 4.3 The Site is an open field allowing for an edge of settlement characteristic for properties in the vicinity. Jaxon's Farmhouse derives a degree of significance from its connection to open land, and although the views to the asset are limited from the Site, the historic functional connection in addition to these glimpsed views means the Site makes a minor positive contribution to the asset. For this reason, setting the development back from the farmhouse, providing a buffer of open land with tree planting would allow for an understanding of the earlier rural context of the farmhouse.
- 4.4 Any proposed development should recognise the need for limits on building heights to 2 or 2.5 storeys and massing equivalent to the established local levels. The appropriate use of domestic and public lighting will also need to be considered as part of preserving the edge of settlement character of the Site.
- 4.5 An appropriate proposed development will also recognise the need to limit introduced noise and traffic to locally appropriate levels. Principal access to the Site should be off the A38 to the east rather than off Hyde Lane if possible, as this will not increase traffic along this road which would potentially impact on the listed buildings along this road. Light should also be inward facing, so as not to create further light onto the isolated heritage assets.
- 4.6 The use of allotment areas and other public landscaped spaces should be utilised to establish and reinforce a strong semi agricultural-edge of settlement character across the development in part to limit inter-visibility with its proximate surroundings and across the Site itself.

5 CONCLUSION

- 5.1 This Built Heritage Statement has been prepared to provide an initial assessment of the significance of the built heritage assets potentially affected by the proposed development of the Site off Hyde Lane, Whitminster.
- 5.2 It has been written with regard to primary legislation (The Planning (Listed Buildings and Conservation Area) Act 1990, the relevant heritage requirements of the National Planning Policy Framework and local policy and guidance.
- 5.3 This assessment has shown that there are four listed buildings which have the potential to be impacted in some way by the development of the Site. Assuming a high degree of design quality, a proportionate residential scheme that reflects the existing built context and semi-rural edge of settlement character of the Site could likely be achieved without incurring substantial harm to the significance of relevant built heritage assets. Some advice has been provided in order to lessen potential impact. Any residual harm will be weighed against the public benefits of the scheme.
- 5.4 **This report is intended to inform the emerging plans and is suitable to accompany pre-application discussions only. It will need to be updated to a full NPPF-compliant Built Heritage Statement, which will include and assessment of impact based on the final scheme, on order to be sufficient to accompany the full application.**



FIGURES



 Site Boundary

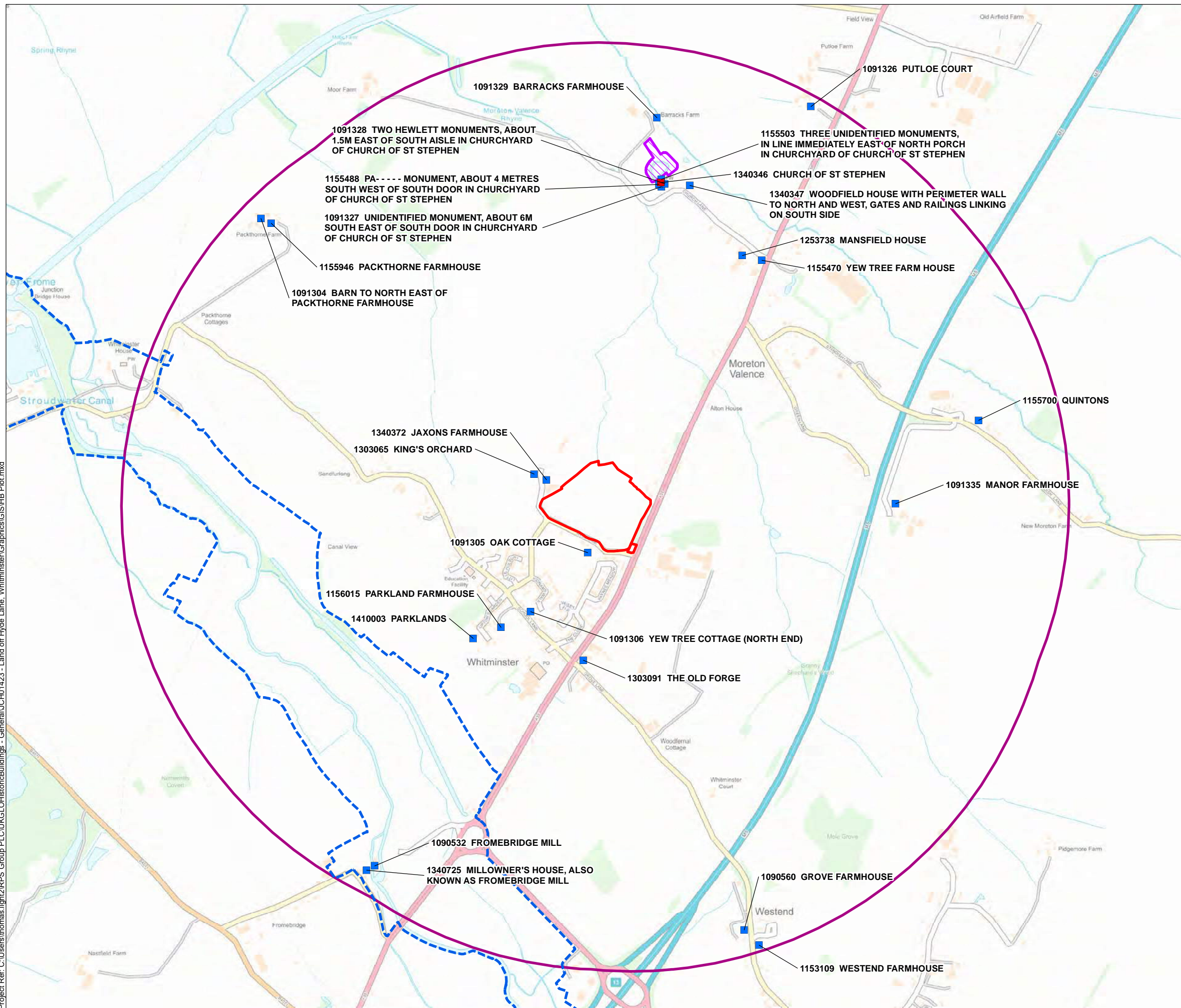


0 100 200m
Scale at A4: 1:8,000



Figure 1
Site Location

Project Ref: C:\Users\thomas.light\2\RPS Group PLC\UKGI\HistoricBuildings - General\CH01423 - Land off Hyde Lane, Whitminster\Graphics\GIS\HB Plot.mxd



Legend

- Site Boundary
- 1500m Site Buffer

Designated Heritage Assets:

Listed Buildings

- Grade I
- Grade II

Scheduled Monument

- 1016767 Moated site at Church Farm

Conservation Area

- Stroud Industrial Heritage

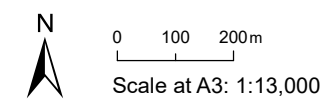



Figure 2
Built Heritage Assets Plot



 Site Boundary (approximate)

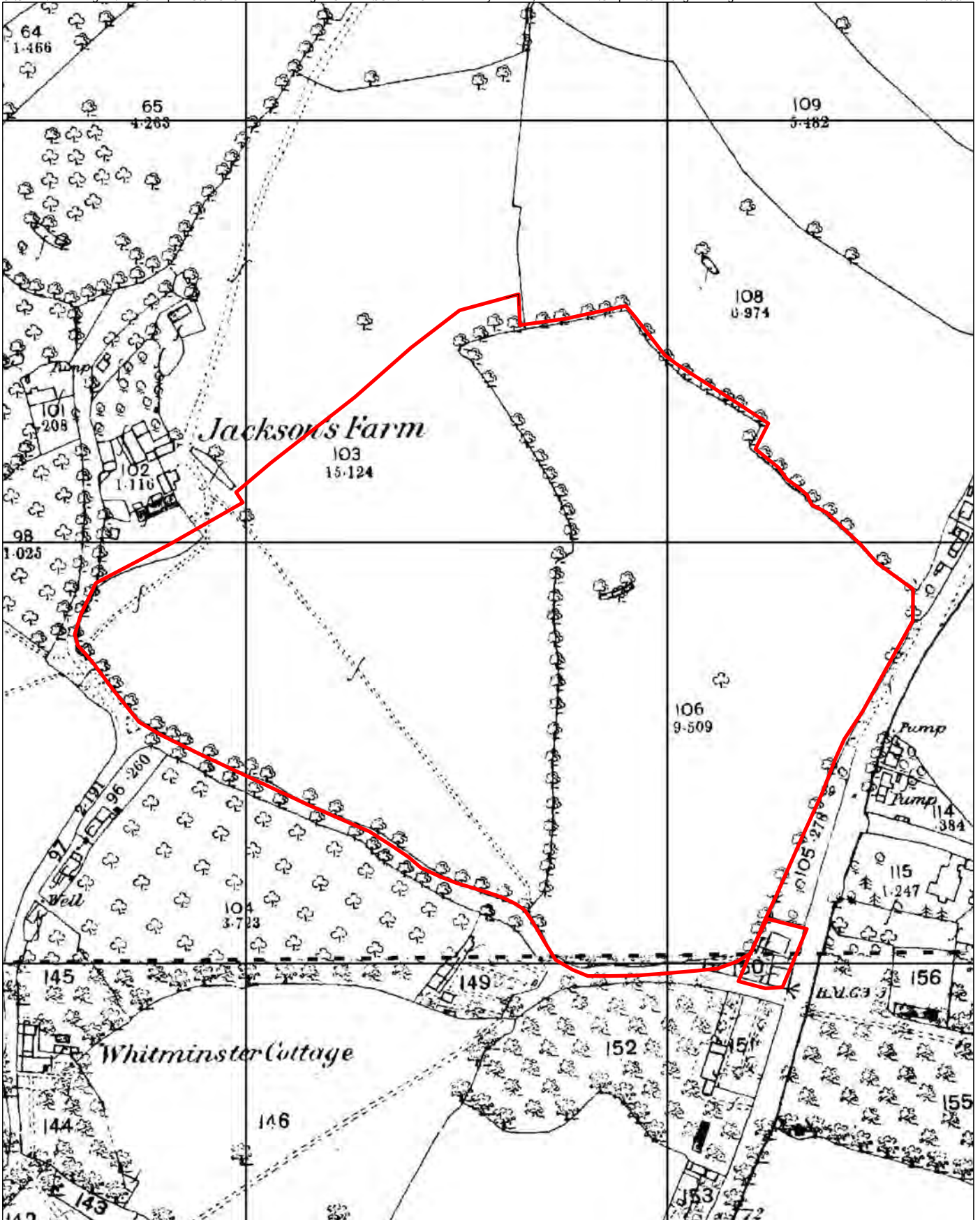



Not to Scale:
Illustrative Only



Figure 3

1838 Map of Parish of Whitminster



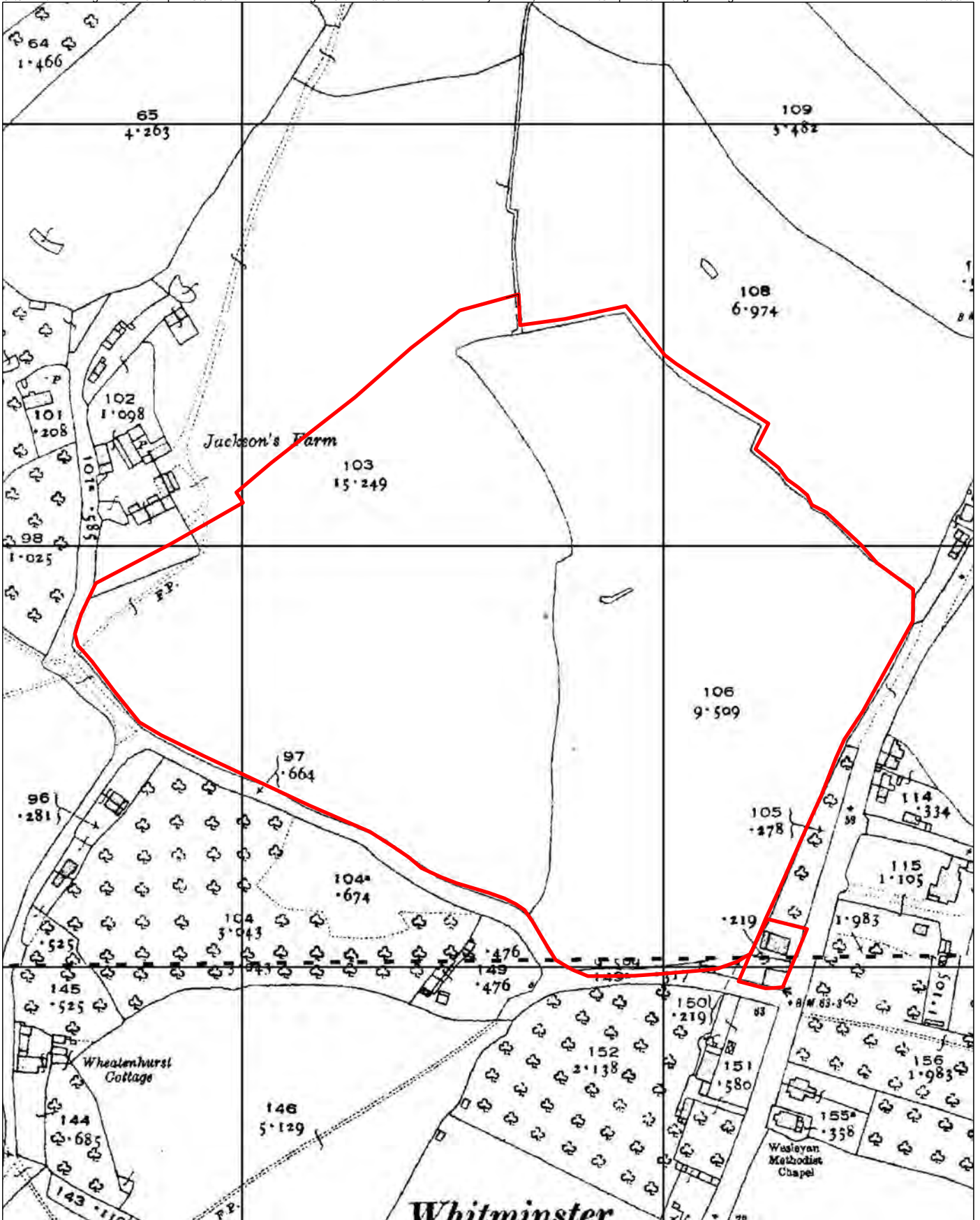
 Site Boundary



0 25 50m
Scale at A4: 1:2,500



Figure 4
1883-4 Ordnance Survey Map



 Site Boundary

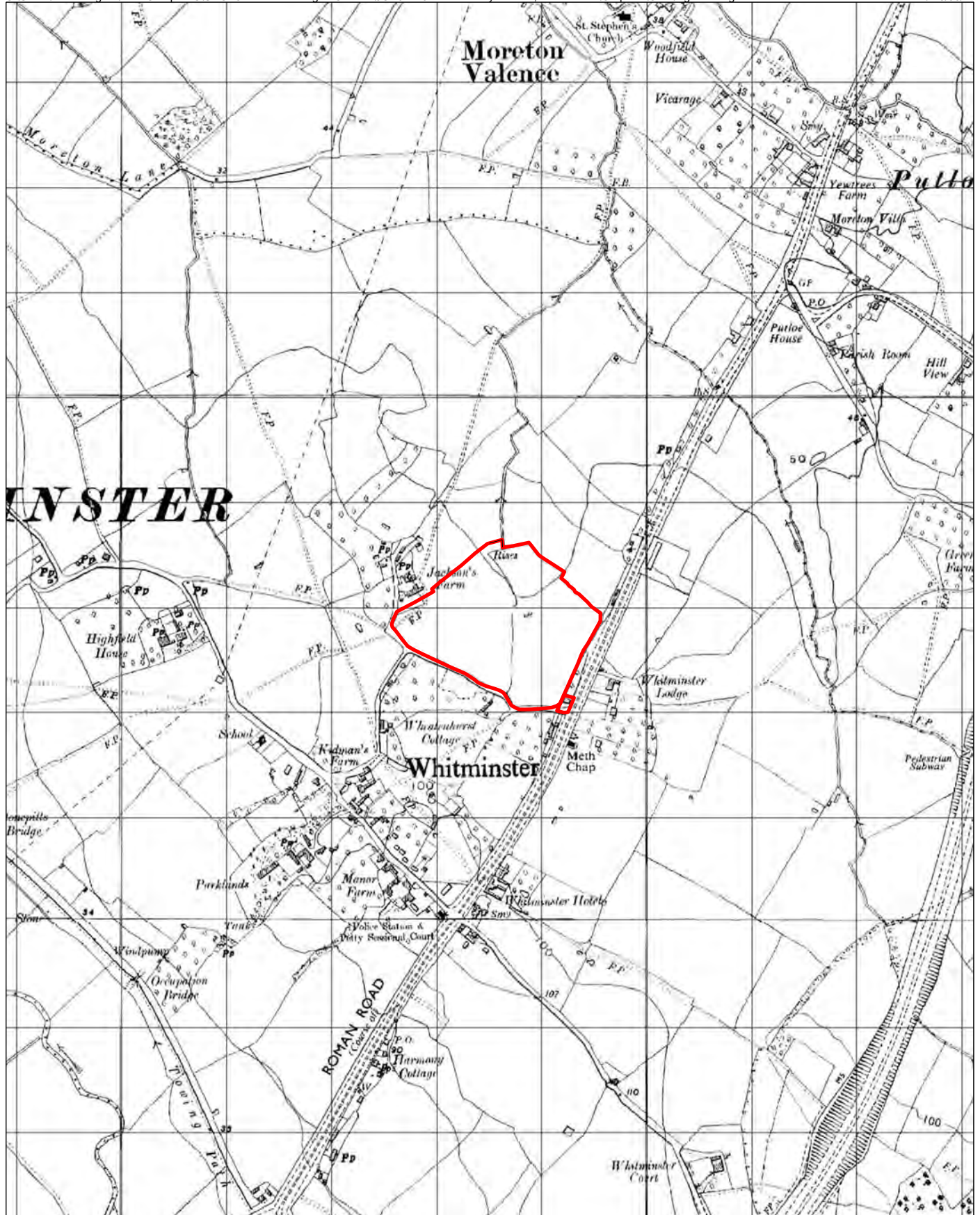


0 25 50m
Scale at A4: 1:2,500



Figure 5

1922-3 Ordnance Survey Map



 Site Boundary

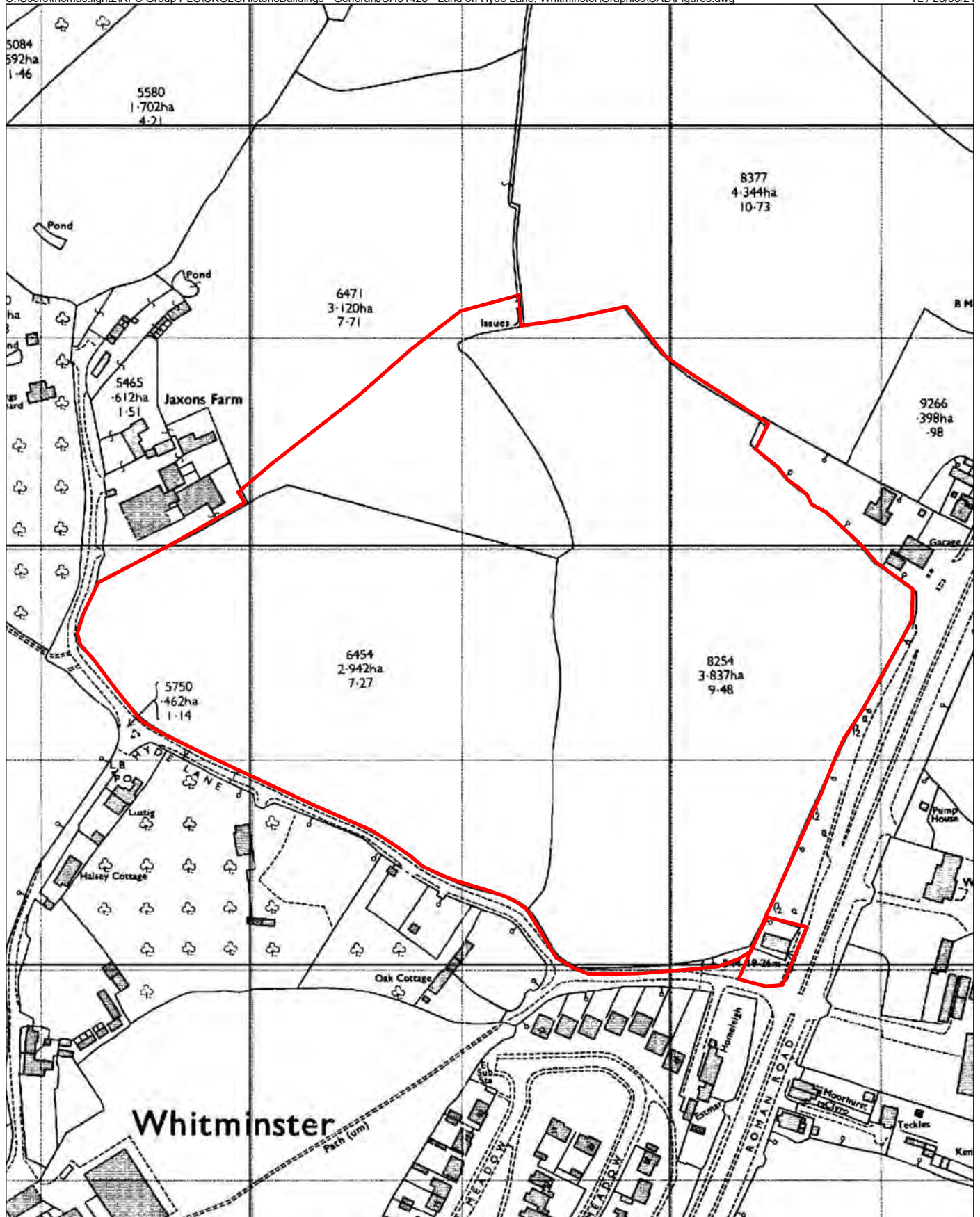


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Scale at A4: 1:10,000



Figure 6

1972 Ordnance Survey Map



 Site Boundary

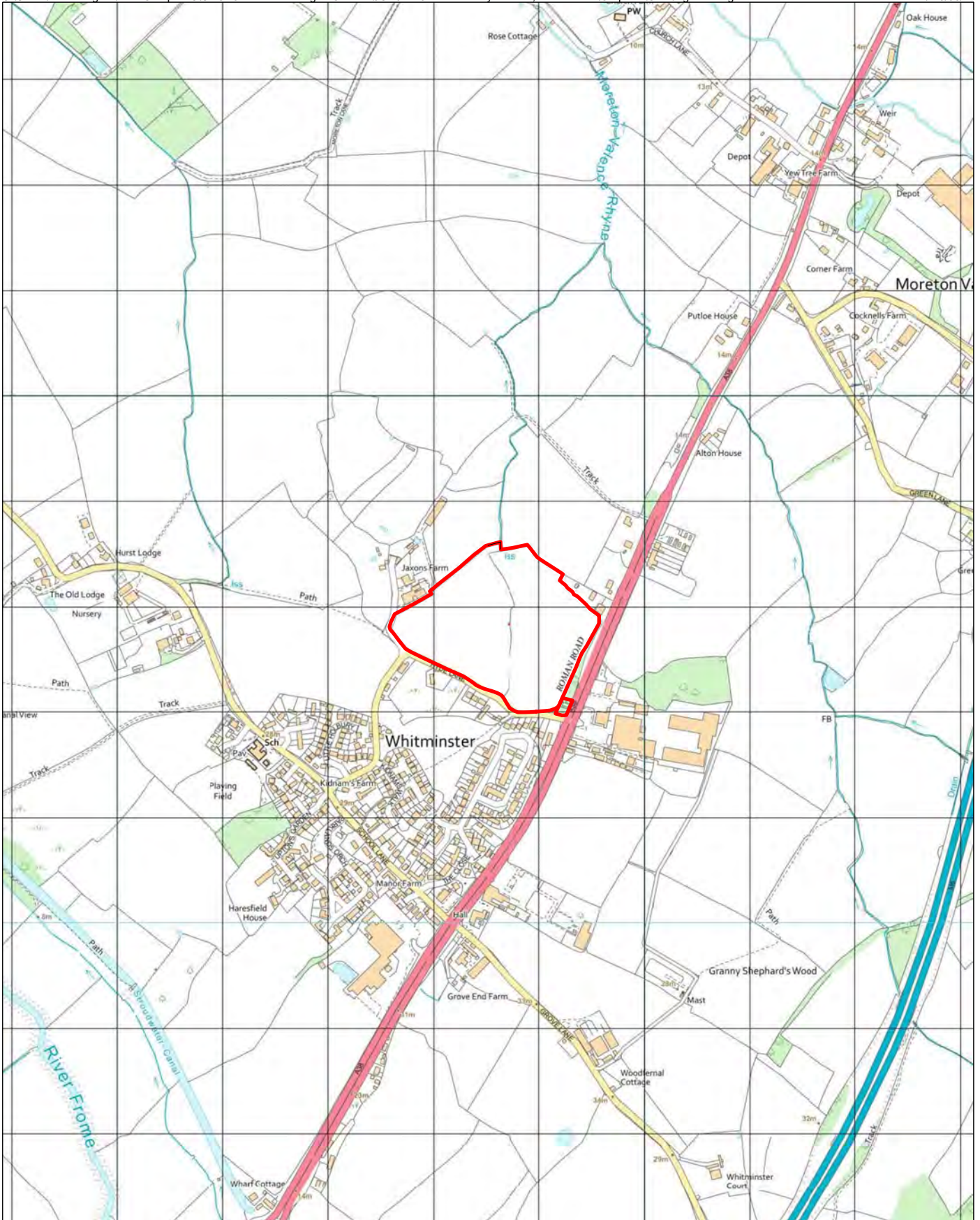


0 25 50m
Scale at A4: 1:2,500



Figure 7

1975 Ordnance Survey Map



 Site Boundary



0 100 200m
Scale at A4: 1:10,000



Figure 8
2021 Ordnance Survey Map

REFERENCES

General

National Planning Policy Framework (NPPF)

Planning Practice Guidance (PPG)

Gloucestershire Historic Environment Record (HER)

Websites

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Domesday Online - – <http://www.domesdaybook.co.uk/>

Historic England: The National Heritage List for England – <http://www.historicengland.org.uk/listing/thelist/>

Stroud District Council: Planning Strategy <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy>

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Victoria County History Gloucestershire: Kathleen Morgan and Brian S Smith, 'Wheatenhurst or Whitminster: Introduction', in *A History of the County of Gloucester: Volume 10, Westbury and Whitstone Hundreds*, ed. C R Elrington, N M Herbert and R B Pugh (London, 1972), pp. 289-291. British History Online <http://www.british-history.ac.uk/vch/glos/vol10/pp289-291> [accessed 30 June 2021].

Cartographic

1838 Map of the Parish of Whitminster (Tithe and Apportionments)

1883-188 Ordnance Survey 1:2,500

1922-3 Ordnance Survey 1:2,500

1972 Ordnance Survey 1:10,000

1975 Ordnance Survey 1:2,500

2021 Ordnance Survey 1:2,500



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APPENDIX G
FLOOD RISK AND DRAINAGE NOTE

Flood Risk Survey

Hyde Lane, Whitminster, Stroud



B05694-CLK-XX-XX-RP-FH-1001

Redrow Homes Limited

Report No.

B05694-CLK-XX-XX-RP-FH-1001

Date

16/07/21

Project

Hyde Lane, Whitminster, Stroud
Flood Risk Survey

Client Name

Redrow Homes Limited

Issue Date	Number	Status	Description of Amendments
16-07-21	P1	S2 Draft	

Report Prepared by:

[Redacted Name]

Approved for Issue by:

[Redacted Name]

Issuing Office

[Redacted Office Name]

This report is provided for the benefit of the Client. We do not accept responsibility in the event that the report contents are used in whole or in part by a third party and we exercise no duty of care to any such third party.
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Appendix B – Severn Trent Sewer Asset records (x1 page)

Executive Summary

Client	Redrow Homes Limited
Site	The site is on approximately 7.5ha of greenfield land at Hyde Lane, Whitminster, Stroud, and can be located by nearest postcode GL2 7LX and National Grid Reference (NGR) SO77745 08553.
Flood Sources & Flood Risk	<p><u>Fluvial Flooding</u></p> <p>The EA 'Flood Map for Planning' shows that the entire site is in Flood Zone 1. This means the site has an annual exceedance of less than 0.1% (1 in 1000-year return period) from fluvial sources.</p> <p>From the LIDAR used to assess site levels, there appears to be a minor ditch that flows from south to north (approximately bisecting the site) before discharging into one of the branches of the Moreton Valence Rhyne at the northern boundary of the site. This branch of the Moreton Valence Rhyne is part of the wider network of rhyne and ditches draining into the tidal reach of the River Severn.</p> <p>The Moreton Valence Rhyne to the north of the site is a watercourse maintained by the Lower Severn Trent Drainage Board (i.e., a viewed rhyne). A 9m buffer is usually applied to all internal drainage board-maintained watercourses and a 6m buffer to all other non-main river watercourse; these buffers should be both sides.</p> <p>The minor ditch on-site therefore presents a constraint to development as it will require a buffer. Vulnerable development would need to be set back up to 8m from this watercourse.</p> <p>Other Flood Sources Assessed</p> <p><u>Groundwater Flooding</u></p> <p>The risk of groundwater flooding is assessed to be low, and mitigation should only be included where necessary. Flooding from this source is not determined to be a constraint to development at the site.</p> <p><u>Sewer Flooding</u></p> <p>The route of a foul sewer rising main appears to run along the inside of the site southern boundary. There is also a 150mm VC foul sewer along Hyde Lane.</p> <p>A 150mm VC public foul sewer from an existing development northeast of the site crosses the site at its north-eastern corner before connecting with a sewer run along Bristol Road (A38).</p> <p>All development must be outside of the required sewer easements, which vary depending on sewer diameter and depth. As a guide, the recommended sewer easement from Sewers for Adoption 6th Edition is 6.5m (maximum). However, any future development should confirm this with the sewerage undertaker (Severn Trent Water).</p>



	<p><u>Surface Water Flooding</u> The risk of surface water flooding on site originates from sources elsewhere, that is, from surface water runoff and overland flow from land east of the site and east of Bristol Road, as well as from areas south of the site.</p> <p>The area of surface water flood risk on-site extends along the overland flow routes from the eastern and south-eastern site boundaries to the northern site boundary.</p> <p>This area has a medium risk of flooding, representing an annual exceedance probability (AEP) of between 1% and 3.3%. There is a small area at the northern boundary of the site with a high risk of surface water flooding, meaning that each year this area has a chance of flooding of greater than 3.3%.</p> <p>However, with appropriate mitigation in place, such as the implementation of swales to intercept where these overland flows enter the site and to direct them along the eastern and northern site boundaries to join flows in the rhyne at the north, surface water flooding is not a significant constraint to development at the site.</p> <p><u>Soils & Bedrock Geology</u> The bedrock geology (indicated by the British Geological Survey), comprises of the Blue Lias Formation and Charmouth Mudstone Formation, indicating that infiltration-based SuDS such as soakaways may not be appropriate for the site.</p>
<p>Does the site pass the Sequential Test?</p>	<p>It will need to be determined whether the site as currently defined by the red-line boundary is considered by the Local Planning Authority (LPA) to have passed the Sequential Test.</p> <p>There are 2 criteria, either of which determines whether a site passes the Sequential Test: (1) the site being entirely within FZ1, and (2) the site is allocated in the Local Plan etc. for the land use/s for which the development at the site is being envisaged.</p>
<p>Compatibility of Different Types of Development</p>	<p>Providing that the site is determined to have passed the Sequential Test then according to Table 3 of the Flood Risk and Coastal Change NPPG, the following types of land uses are possible on site:</p> <ul style="list-style-type: none"> • For FZ1 areas, all types of land uses are compatible. • For FZ2 areas, both “more vulnerable” (e.g., residential units) and “less vulnerable” (e.g., commercial buildings, buildings for general industry, storage, and distribution etc.) categories of land uses are possible. • For FZ3a, both “more vulnerable” (e.g., residential units) and “less vulnerable” (e.g., commercial buildings, buildings for general industry, storage, and distribution etc.) categories of land uses are possible. However, in the case of more vulnerable developments proof of passing an Exemption Test is required.
<p>Drainage</p>	<p><u>Existing Drainage, Future Considerations & Opportunities</u> The existing soil types and bedrock geology indicate that infiltration-based drainage methods such soakaways may not be appropriate for the site. However, this would need to be confirmed by BRE soakaway tests.</p>



	<p>There are public foul sewers along the southern site boundary and along Hyde Lane (south of the site). There are also public foul sewers in the north-eastern corner of the site and along Bristol Road (east of the site). Foul flows from future development of the site could potentially connect to this network (subject to consultation and agreement with Severn Trent Water). There may also be a need for a hybrid of gravity and pump-based foul drainage at the site due the fact that potential connection points for foul discharge in the south and east – i.e., against the prevailing site gradient and topography, which falls to the north.</p> <p>There are no surface water sewers close to the site; however, surface water from the development could potentially drain to the Moreton Valence Rhyne in the north.</p> <p>The area of low ground at the north of the site may also be suitable for SuDS such as attenuation ponds/basins, which can attenuate surface water flows before discharging into the Moreton Valence Rhyne at a controlled rate.</p>
<p>Development recommendations</p>	<p>Clarkebond recommends that the following actions are undertaken prior to submission of a planning application for the redevelopment of the site:</p> <ul style="list-style-type: none"> • Consultation with the Council to establish whether Sequential and Exemption Tests are required for the site. • Obtain the latest available public sewer record/maps for the area. The current sewer map shows that a foul rising main along the southern border of the site. This sewer will need to be accurately mapped by utilities and topographic surveys. • Obtain the most up-to-date fluvial flood data available (levels, flows, extents etc.) including historic flood data from the Environment Agency or others. • Confirm with Lower Severn Internal Drainage Board the water management levels, summer penning levels and other relevant flow, levels, or buffer restrictions/requirements. • Consult with Severn Trent Water to confirm that the local public foul network has the capacity for any new developments at the site and to confirm any easement requirements. • Undertake BRE Digest 365 soakaway tests to confirm infiltration rates for the site. • Agree with the riparian owner of the watercourse north of the development site (LLFA or Lower Severn Internal Drainage Board), discharge requirements, and relevant permits, consents etc.

1 Introduction

1.1 Overview

Clarkebond (UK) Ltd was commissioned by Redrow Homes Limited to produce a Flood Risk Survey (FRS) for a site known as Hyde Lane, Whitminster, Stroud.

The purpose of this report is to provide an appraisal of flood risk and drainage at the site, outlining the existing issues and constraints and to highlight potential constraints and opportunities for future development at the site.

This survey is suitable for informing conceptual master-plan development and pre-planning considerations; however, it does not (in its current form) qualify as a site-specific Flood Risk Assessment (FRA).

1.2 Site Location and Description

The site is situated on approximately 7.5ha of greenfield land located at Hyde Lane, Whitminster, Stroud. The site can be located by nearest postcode GL2 7LX and National Grid Reference (NGR) SO77745 08553.

The site is bounded to the north, west and east by predominately agricultural greenfield land. The A38 (Bristol Road) bounds the sites eastern boundary, with the village of Whitminster located south of southern boundary.

The main access route to the site is via Hyde Lane. The site boundary is shown in **Figure 1**.



Figure 1: Site Boundary

1.3 Site Levels

Topographic data for the site was gathered from the LiDAR composite Digital Terrain Model (DTM), produced by the Environment Agency at a spatial resolution of 1m. LiDAR is a mapping technique, which uses a laser to measure the distance between the aircraft and the ground. Up to 500,000 measurements per second are made of the ground, allowing highly detailed terrain models to be generated. The results are presented in **Figure 2** and **Appendix A**.

0.5m Contours were added to the DTM to indicate the gradient of the site and illustrating the topography. The highest level on site can be found at the south-west of the site at approximately 26.1m AOD. The land slopes away from the south of the site towards the north and the Moreton Valence Rhyne. The lowest levels on site can be found at the north-east corner of the site, at approximately 14m AOD.

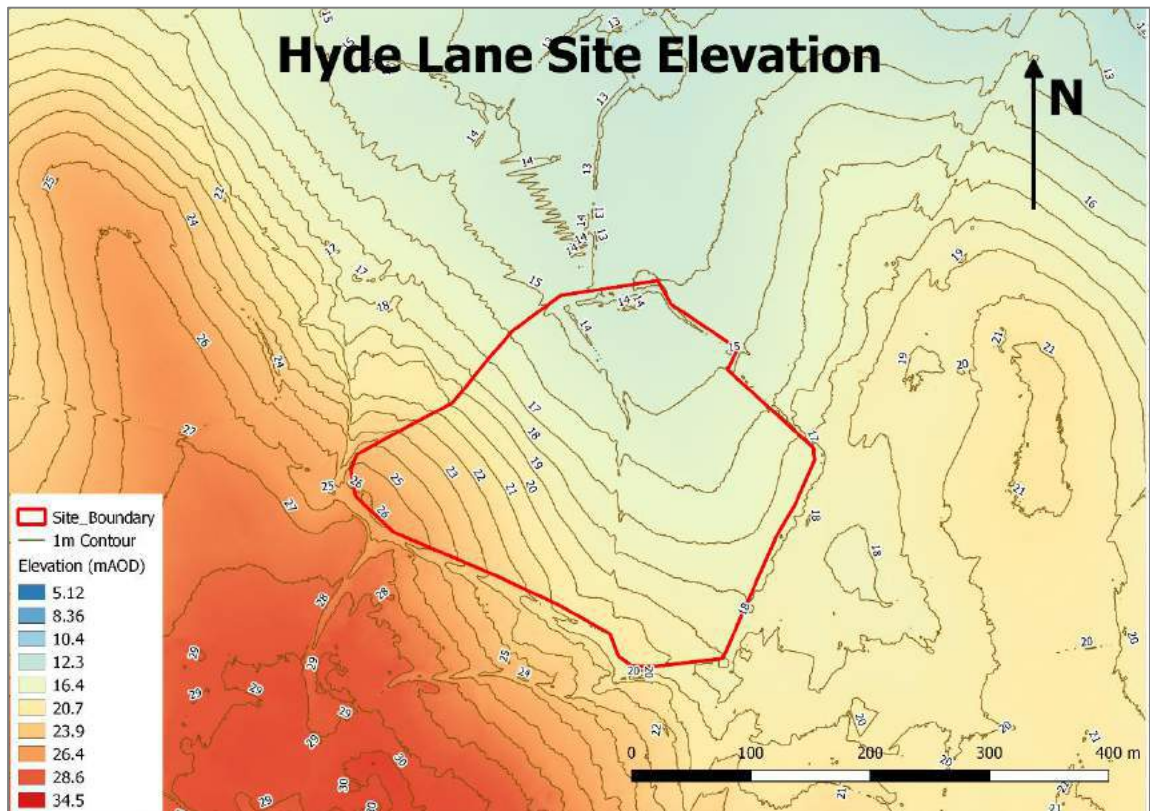


Figure 2: Site Levels

1.4 Methodology

The report is based on flood risk policy contained within the National Planning Policy Framework (NPPF, 2019) and guidance found in the Flood Risk and Coastal Change National Planning Policy Guidance (NPPG).

The assessment of flood risk was informed by the Level-1 Strategic Flood Risk Assessment (SFRA) 2008 for the Lead Local Flood Authority (LLFA) Gloucestershire County Council (GCC) and Local Planning Authority (LPA) Stroud District Council documents, Environment Agency (EA) data and information available on government websites.

1.5 Limitations

The information, views and conclusions drawn concerning the site are based, in part, on information supplied to Clarkebond by other parties. Clarkebond has proceeded in good faith on the assumption that this information is accurate. Clarkebond accepts no liability for any inaccurate conclusions, assumptions or actions taken resulting from any inaccurate information supplied to Clarkebond from others.

2 Policy Overview

2.1 National Planning Policy Framework (NPPF)

National policy on flood risk is set out in paragraphs 155 to 165 of the NPPF (2019) which is also supplemented by National Planning Practice Guidance (NPPG) for flood risk and coastal change. The overarching aim of the NPPF is to ensure inappropriate development in areas at risk of flooding are avoided, which is achieved via application of the Sequential Test.

In summary, the Sequential test aims to highlight the areas at lowest probability of flooding (Flood Zone 1) and steer new development to these areas. If the location of the low-risk area is not suitable due to wider sustainability objectives then progressively higher risk areas (Flood Zone 2/Flood Zone 3) can be considered, provided the development will be suitably safe from flooding and does not increase flood risk to other areas.

After undertaking the Sequential Test, the vulnerability of development to flooding must be considered so that more vulnerable uses are given priority for lower risk land. This exercise is undertaken by referring to Table 2 (Paragraph 066) of NPPG which shows the vulnerability classifications of various land use types and Table 3 (Paragraph 067) of NPPG which shows the compatibility of the different vulnerability categories with the Flood Zones and requirements for the Exception Test. To pass this test, the following needs to be demonstrated:

1. The development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and
2. the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

2.2 Local Planning Policy

Local planning policy provides more specific detail on development requirements based on the flood risk in the local county or borough. Although these policies will broadly be in line with national policy, where additional requirements are required, this will take precedence. A summary of each of the relevant policy documents, which would need to be considered in any future developments at the site, is provided below:

- Stroud District Local Plan (2015)
 - Delivery Policy ES4: Water Resources, quality, and Flood Risk
This is the primary policy in relation to development and the water environment. It echoes national policy and focuses on achieving water efficiency and sustainability, emphasising the use of SuDS in development where possible. It also emphasises the criteria and requirement which sites need to achieve to mitigate and minimize flood risk from multiple sources. It is stated that new development in areas with known ground and surface water flooding issues will seek to provide betterment in flood storage and to remove obstructions to flood flow routes where appropriate.

- Gloucestershire County Council (GCC) Level-1 Strategic Flood Risk Assessment (SFRA) (2008)
 - The Level 1 SFRA provides a baseline assessment of the flood risk within Gloucestershire County as well as provides guidance for how site-specific flood risk assessments should be completed.
- Stroud District Council Level-2 SFRA (2008)
 - This serves as the detailed assessment of tidal flood risk within the district, focusing primarily on Quedgeley, Stroud, Dursley and Sharpness Area. This was produced for the previous Level-1 SFRA. The principal purpose of a Level 2 SFRA is to facilitate the application of the Sequential and Exception Tests.
- Gloucestershire Local Flood Risk Management Strategy (2014)
 - The Strategy is an important tool to help individuals, communities, businesses, and authorities understand and manage flood risk within the county. The Strategy will be used by GCC to help plan and co-ordinate investment in flooding. It also sets out the Council's understanding of flood risk and how they prioritise investment in specific locations. It considers broad actions it can take to manage flood risk.
- Severn River Basin District Flood Risk Management Plan
 - The Flood Risk Management Plan (FRMP) for the Severn Basin District (RBD) provides an overview of the range of flood risks from different sources across the 10 catchments of the RBD.
 - The FRMP provides a range of objectives and programmes of measures identified to address these risks from all flood sources. These are drawn from the many risk management authority plans already in place, but also include a range of further strategic developments for the FRMP 'cycle' period of 2015 to 2021.

3 Flood Risk

3.1 Flood Zones and Development Compatibility

Flood Zones indicated in the online 'EA Flood Map for Planning' show the risk of flooding from rivers under the jurisdiction of the EA (referred to as 'Main Rivers') and/or risk of coastal/tidal flooding. As the site is far inland away from coastal/tidal sources, the Flood Zones in the area will relate to river flooding only.

Flood Zones are defined based on the probability of the land flooding from a main river or the sea, as shown in **Table 1**. They are used by Local Planning Authorities (LPAs) as the primary indicator of whether the land is suitable for development in terms of flood risk, and they control the type of development which will be accepted in a planning application.

Flood Zone	Definition
Zone 1 'Low Probability'	Land having a less than 1 in 1,000 annual probability of river or sea flooding.
Zone 2 'Medium Probability'	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or Land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding.
Zone 3a 'High Probability'	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.
Zone 3b 'The Functional Floodplain'	This zone comprises land where water must flow or be stored in times of flood. The Strategic Flood Risk Assessments should identify the areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency.

The EA 'Flood Map for Planning' shows that the entire site is located within Flood Zone 1. This means this area of the site has an annual exceedance of less than 0.01% (1 in 1000-year return period) from fluvial sources. This is shown in **Figure 3**.

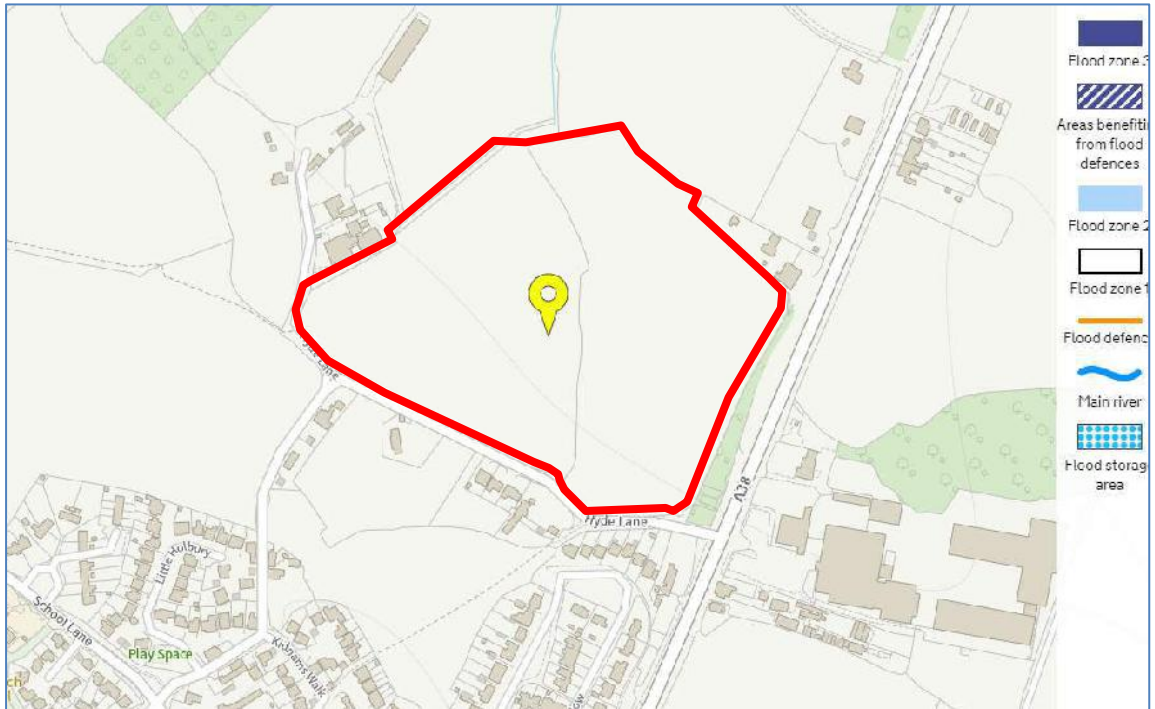


Figure 3: EA 'Flood Map for Planning'

In accordance with **Table 1** (taken from Table 3 of the Flood Risk and Coastal Change NPPG), all developments are compatible at the site.

NB: It is worthwhile recognising however that the above analyses (flood extents and flood zone designations) do not consider the future effects of climate change or other hydraulic factors such as the effects of blockages at potential choke points on flood levels and extents.

Table 1: Flood Risk Vulnerability and Flood Zone 'Compatibility'

Flood Risk Vulnerability Classification		Essential Infrastructure	Water Compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zones	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	X	Exception Test required	✓
	Zone 3b	Exception Test required	✓	X	X	X

Where ✓ means the development is appropriate and X means the development should not be permitted

3.2 Fluvial Flood Risk

As previously mentioned, the site is in Flood Zone 1 which is the lowest risk classification given by the EA. It is an area where safe refuge should be sought from flooding and therefore can be considered safe.

The NPPF requires that the future impact of climate change on flood risk should be considered, even for those areas currently in Flood Zone 1.

The site is approximately 1km southeast of the outer extent of the Severn estuary floodplain and is located on relatively high ground. Therefore, the risk from fluvial flood risk is assessed to be very low and will not act as a constraint to development at the site. Tidal flood risk has also been ruled out as a constraint to development.

3.3 Other Sources of Flood Risk

Other sources of flooding assessed in this survey are:

- Flood risk from ordinary watercourses (watercourses not under jurisdiction of EA)
- Flood risk from groundwater sources of hazard
- Flood risk from surface water sources of hazard
- Flood risk from sewer sources (for e.g., the exceedance of sewer and drain capacities, and from failure of pumping station etc.)
- Flood risk from failure of reservoirs, canals and other artificial waterbodies and infrastructure.

3.3.1 Ordinary Watercourse Flooding

From the LIDAR used to assess site levels, there appears to be a minor ditch that flows from south to north (approximately bisecting the site) before discharging into one of the branches of the Moreton Valence Rhyne at the northern boundary of the site. This branch of the Moreton Valence Rhyne is part of the wider network of rhynes and ditches draining into the tidal reach of the River Severn.

This minor ditch on-site presents a constraint to development as it will require a development buffer. Vulnerable development would need to be set back up to 8m from this watercourse.

3.3.2 Groundwater Flooding

Groundwater flooding typically occurs when water levels rise above surface elevations from underlying rocks or springs following prolonged rainfall. The two most common mechanisms of groundwater flooding are:

1. Bedrock Flooding – Occurs following extended periods of rainfall in areas underlain by a permeable bedrock outcrop. Typically, chalk aquifers pose the greater risk, where the large pore spaces in the rock allow the water table to rise rapidly. Settlements most at risk are those in low-lying areas and at the base of steep-sided valleys at the interface between permeable and impermeable strata (where the groundwater table is naturally closer to the ground surface).
2. Superficial Deposit Flooding – Occurs in permeable unconsolidated deposits (e.g., gravel) which lie on river floodplains following high in-bank river levels.

The Level-1 SFRA makes no mention of any recorded flood events in the Stroud District that can be attributed to groundwater. Despite this, the Level 1 SFRA states that the catchment area of the River Severn contains numerous groundwater springs, impacting on the contribution to flow in adjacent watercourses and the clays and mudstones of the Severn Valley which lie close to the groundwater table for much of the year. Consequently, they are frequently saturated with standing water across the floodplain, increasing the risk of surface runoff and localised flooding.

According to Landis 'Soilscales', the site is underlain by 'Soilscale 9, which is lime-rich, loamy and clayey soils with impeded drainage'. The area is known to have slightly impeded drainage. Slightly impeded drainage refers to soils with a tight, compact deep subsoil that impedes downward water movement; after heavy rainfall, particularly during the winter, the subsoil becomes waterlogged.

A review of historic borehole data locally does not indicate a high-water table.

The risk is therefore assessed to be **low**, and mitigation should only be included where necessary. Flooding from this source is not determined to be a major constraint to developments at the site.

3.3.3 Sewer Flooding

Severn Trent Water is the statutory water undertaker and keeps a record of historic sewer flood events in a database called the DG5 register. According to data in the Level-1 SFRA, which is assumed to include data taken from the DG5 register, sewer flood risk in the district is classed as **medium to low**. The categorisation is as follows:

- Low sewer flood risk: 1 to 5 properties
- Medium sewer flood risk: 6 to 15 properties
- High sewer flood risk: >15 properties

It should be noted the DG5 register provides a 'snapshot' in time and will be outdated by the addition of new properties. However, new properties may in fact create betterment, from both application of the SuDS Hierarchy and the potential for capital investment in the public sewer system.

According to Severn Trent Water's 'Public Foul Surface Water Asset Map' (**Appendix B**), a 40mm PVC pressure foul sewer runs east, parallel to the southern boundary of the site, and discharging into a pump house east of the A38 (Bristol Road).

It is possible that damage caused to this public foul sewer on site could potentially lead to localised pollution and flooding. However, the likelihood of occurrence is low.

it is assessed that the sewer flooding does not pose a significant constraint to development at the site.

3.3.4 Surface Water Flooding

Surface water flooding is caused by heavy rainfall events that result in significant surface runoff and ponding of accumulated water. The probability and impact of flooding is heavily dependent on the topography of a site, as well as the ground conditions and infiltration capability.

As can be seen from the EA surface water flood map (**Figure 4**) most of the site is at very low risk of surface water flooding. However, there is a band of overland flooding extending from the south-east to the north, which represents 0.1 – 1% AEP (i.e., low risk), with some small areas within this band at medium risk of flooding, representing an AEP of between 1% and 3.3%. An area of high risk is located at the north of the site, meaning that each year this area has a chance of flooding of greater than 3.3%.

The risk of surface water flooding on site originates from sources elsewhere, that is, from surface water runoff and overland flow from land east of the site and east of Bristol Road, as well as from areas south of the site.

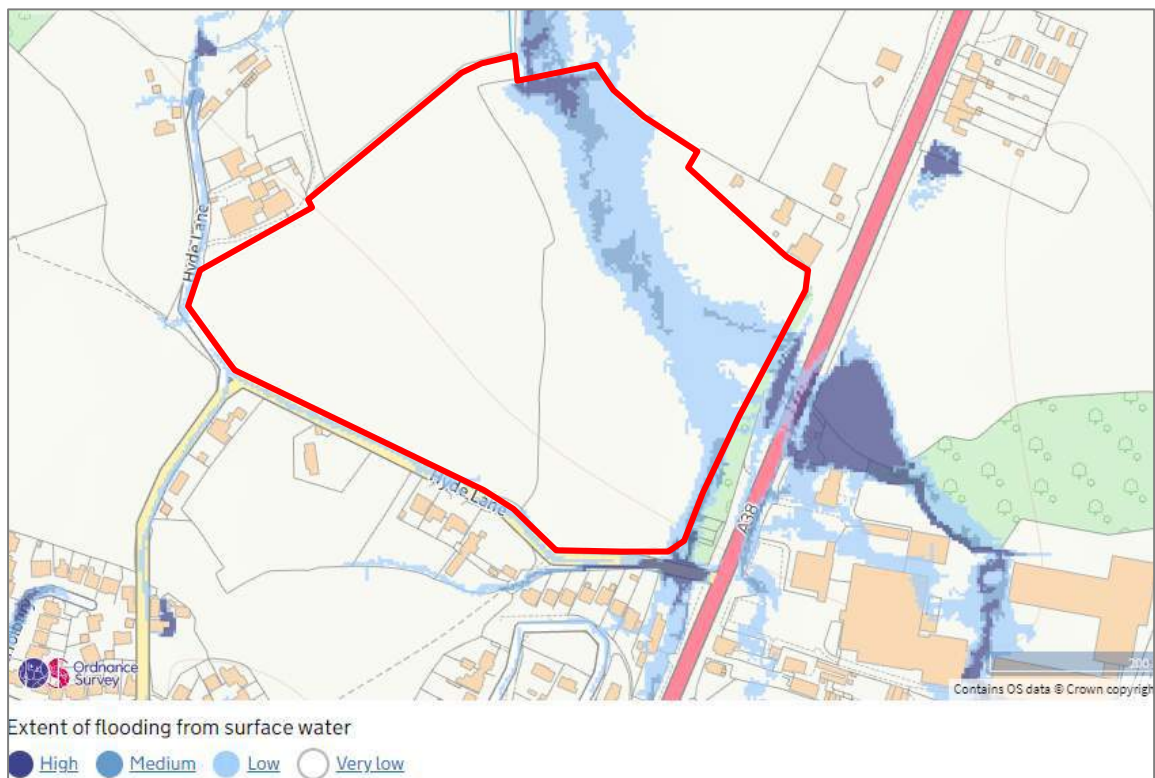


Figure 4: EA Surface Water Flood Map

For the purposes of detailed assessment, the medium risk scenario will be considered, as this is the same probability as the design fluvial flood event (>1% AEP/1 in 100 AEP).

Figure 5 indicates the Medium Risk and flood depth scenario. Surface water in this scenario is indicated to be minimal, often occurring sporadically along the overland flow routes, leading to a concentrated area at the northern boundary at predicted depth of below 300mm.

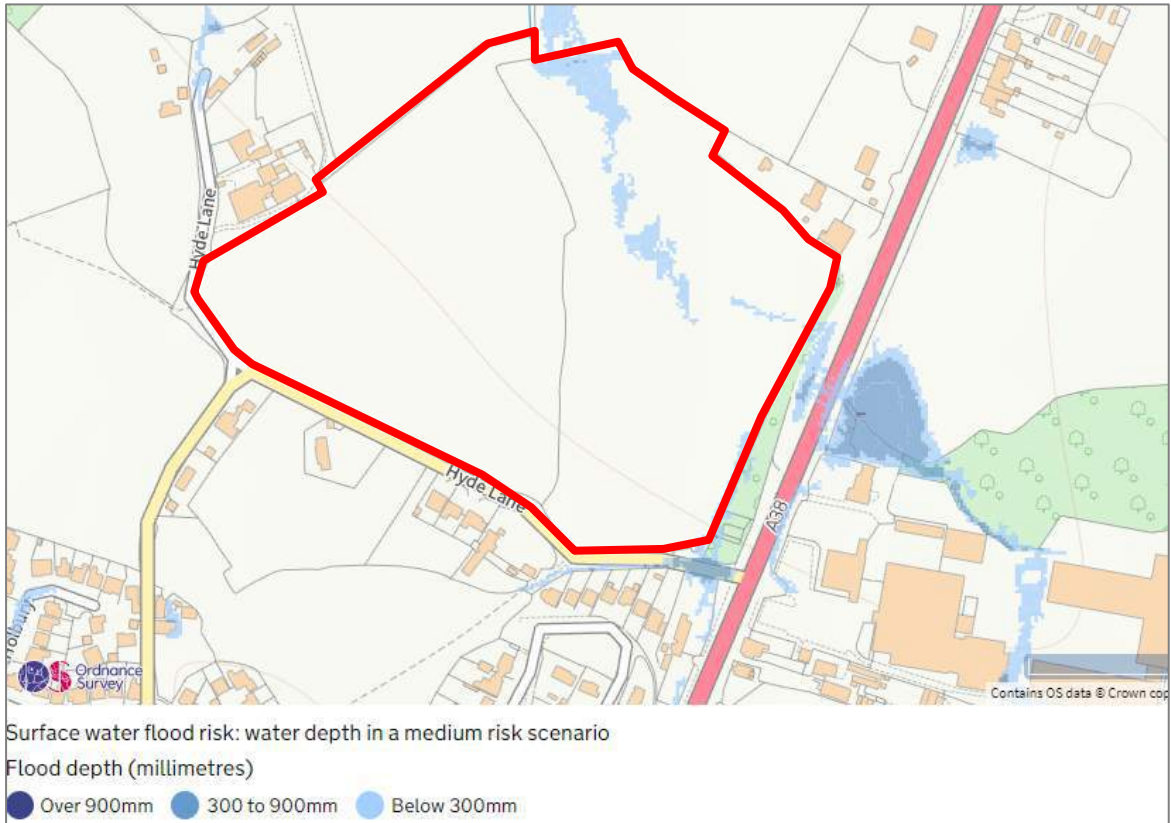


Figure 5: Medium Risk Scenario - Extent

A similar pattern exists with the Medium Risk and flow velocity scenario (**Figure 6**) which shows the velocity of the flooding to be over 25m/s. This is likely due to the prevailing topography.

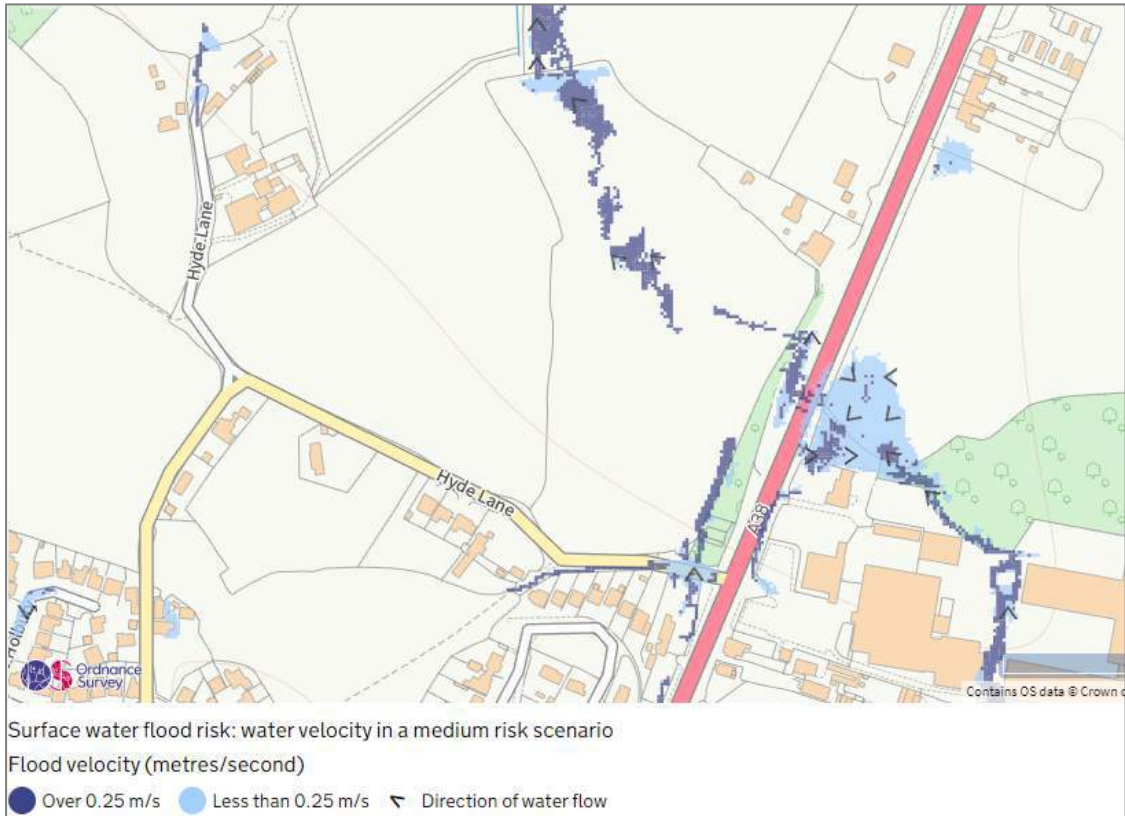


Figure 6: Medium Risk Scenario - Velocity

Detailed mapping of the predicted surface water flooding indicates the depth would be <300mm at a velocity >0.25m/s. When applied to the FD2320/TR2 flood hazard matrix (Figure 7), this would result in a low hazard.

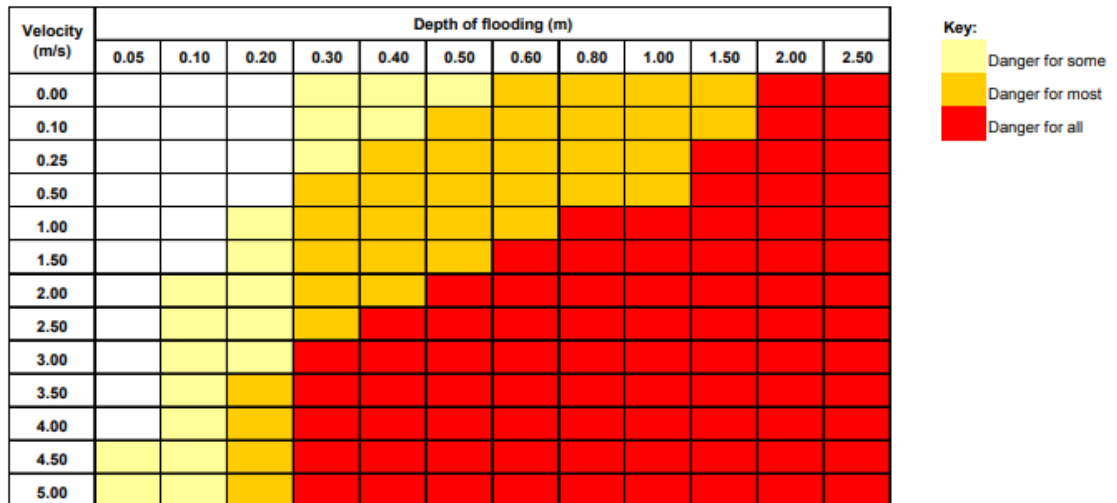


Figure 7: Flood Hazard Matrix (FD2320/TR2, DEFRA, 2005)

However, with appropriate mitigation in place, such as the implementation of swales to intercept where these overland flows enter the site and to direct them along the eastern and northern site

boundaries to join flows in the rhyne at the north, surface water flooding is not a significant constraint to development at the site.

3.3.5 Flooding from Artificial Infrastructure Failure

The site is not located within an area at risk of flooding from reservoirs in the event of a failure or breach. Therefore, the risk is negligible and will not act as a constraint to development.

3.4 Opportunities and Constraints

The site is located within Flood Zone 1. This means this area of the site has an annual exceedance of less than 0.01% (1 in 1000-year return period) from fluvial sources. All developments are compatible within Flood Zone 1, providing the site is determined to have passed the Sequential Test.

The site is in an area where groundwater flooding is not assessed to pose a significant risk of flooding. Furthermore, available borehole data on-site do not record any indication of a high-water table present.

The existing soil types and bedrock geology indicate that infiltration-based drainage methods such as soakaways may not be appropriate for the site. However, this would need to be confirmed by BRE soakaway tests.

There are public foul sewers along the southern site boundary and along Hyde Lane (south of the site). There are also public foul sewers in the north-eastern corner of the site and along Bristol Road (east of the site). Foul flows from future development of the site could potentially connect to this network (subject to consultation and agreement with Severn Trent Water). There may also be a need for a hybrid of gravity and pump-based foul drainage at the site due to the fact that potential connection points for foul discharge are in the south and east – i.e., against the prevailing site gradient and topography, which falls to the north.

There are no surface water sewers close to the site; however, surface water from the development could potentially drain to the Moreton Valence Rhyne in the north.

The area of low ground at the north of the site may also be suitable for SuDS such as attenuation ponds/basins, which can attenuate surface water flows before discharging into the Moreton Valence Rhyne at a controlled rate.

4 Drainage

4.1 Public Sewers

All development must be outside of the required sewer easements, which vary depending on sewer diameter and depth. As a guide, the recommended sewer easements from Sewers for Adoption 6th Edition are provided in **Table 2**. However, any future development should confirm this with the sewerage undertaker (Severn Trent Water).

Table 2: Recommended Sewer Easements ('Sewers for Adoption' 6th Edition)

Depth to invert level (m)	Sewer Diameter (mm)									
	<150	150-299	300-449	450-600	601-749	750-924	925-1000	1001-1124	1125-1399	1400 or greater
<3	3	3	3	3.5	3.5	4	5	5	5	5
3-4	3	3	3	4	4	5	5	5	5	5
4-5	4	4	4	5	5	5	6	6	6.5	6.5
5-6	5	5	5	6	6	6.5	6.5	6.5	6.5	6.5
6-7.5	6	6	6	6	6	6.5	6.5	6.5	6.5	6.5
7.5 or greater	4	4	4	4	4	5	5	5	5	6

Sewer asset records were provided by Severn Trent Water (see **Appendix B**), which show the approximate location of all sewerage within their record.

All proposed development must be outside of the required sewer easements, which vary depending on sewer diameter and depth. As a guide, the recommended sewer easement from Sewers for Adoption 6th Edition is 6.5m (maximum). However, any future development should confirm this with the sewerage undertaker (Severn Trent Water).

Consultation with Severn Trent Water will also be required to ensure the local public foul network has the capacity for any new developments at the site and to confirm any easement requirements.

5 Mitigation and Management Recommendations

Flood risk mitigation and management measures for any future development should apply the hierarchical process outlined in Section 5 of the BS 8533:2017 'Assessing and Managing Flood Risk in Development – Code of Practice'. Recommendations on how to apply the hierarchy are as follows:

1. **Stage 1 – Assessing and understanding the flood risk.**
Completion of a full site-specific Flood Risk Assessment
2. **Stage 2 – Avoiding the Risk**
Application of the Sequential Test by evaluating the development potential of lower flood risk sites.
3. **Stage 3 – Substitution**
Application of the Sequential Test within the boundary of development, placing new development within the areas at lowest risk.
4. **Stage 4 – Land raising, flood control/surface water management incorporation.**
Ground Finished Floor Levels (FFLs) for new developments should be set above the design flood level or raised as much as is practicable.

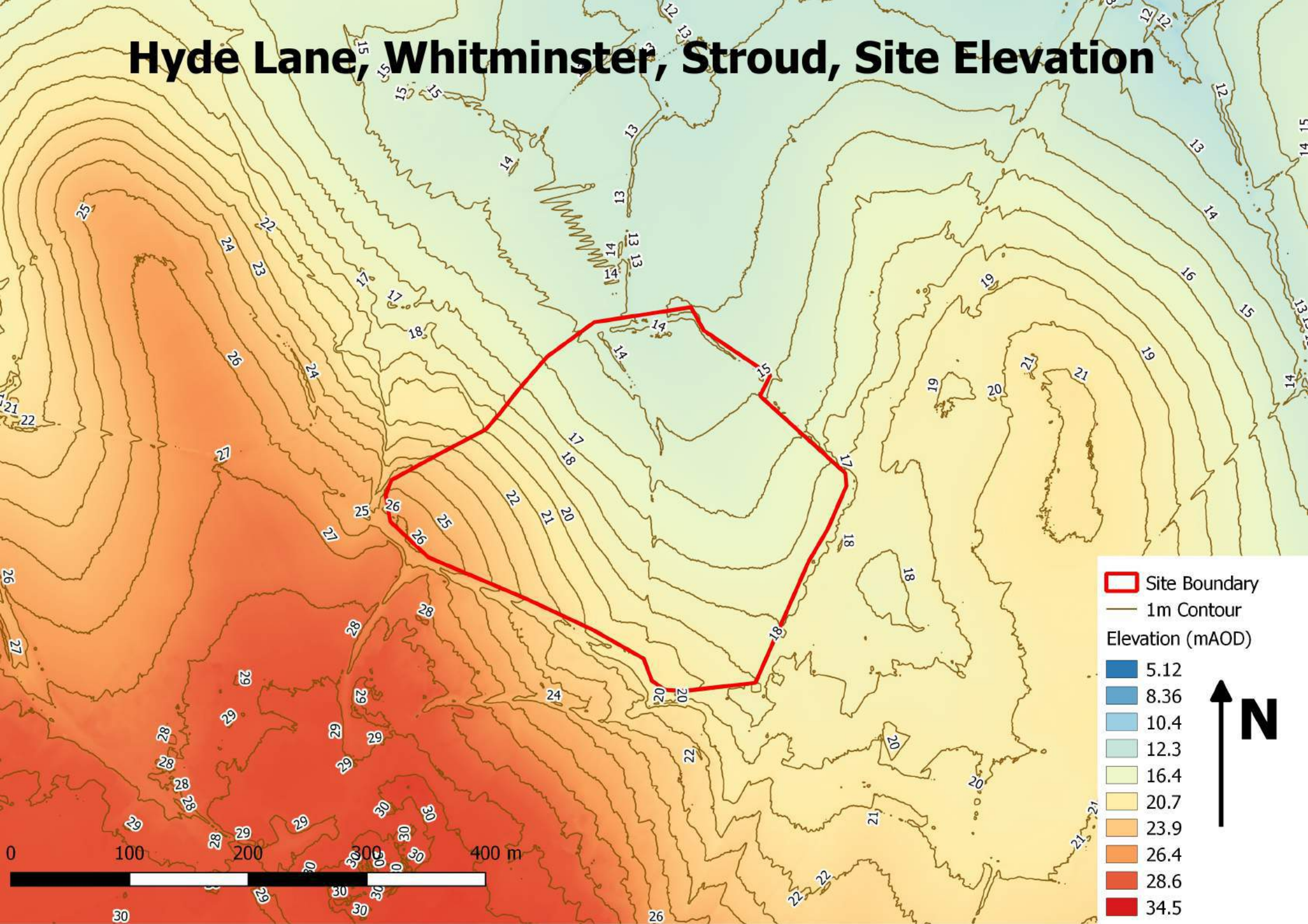
Any new development exceeding the area of the existing buildings will need to provide compensatory storage for any volume lost from the predicted design fluvial event.

Any new development should consider surface water management at the earliest design stage.

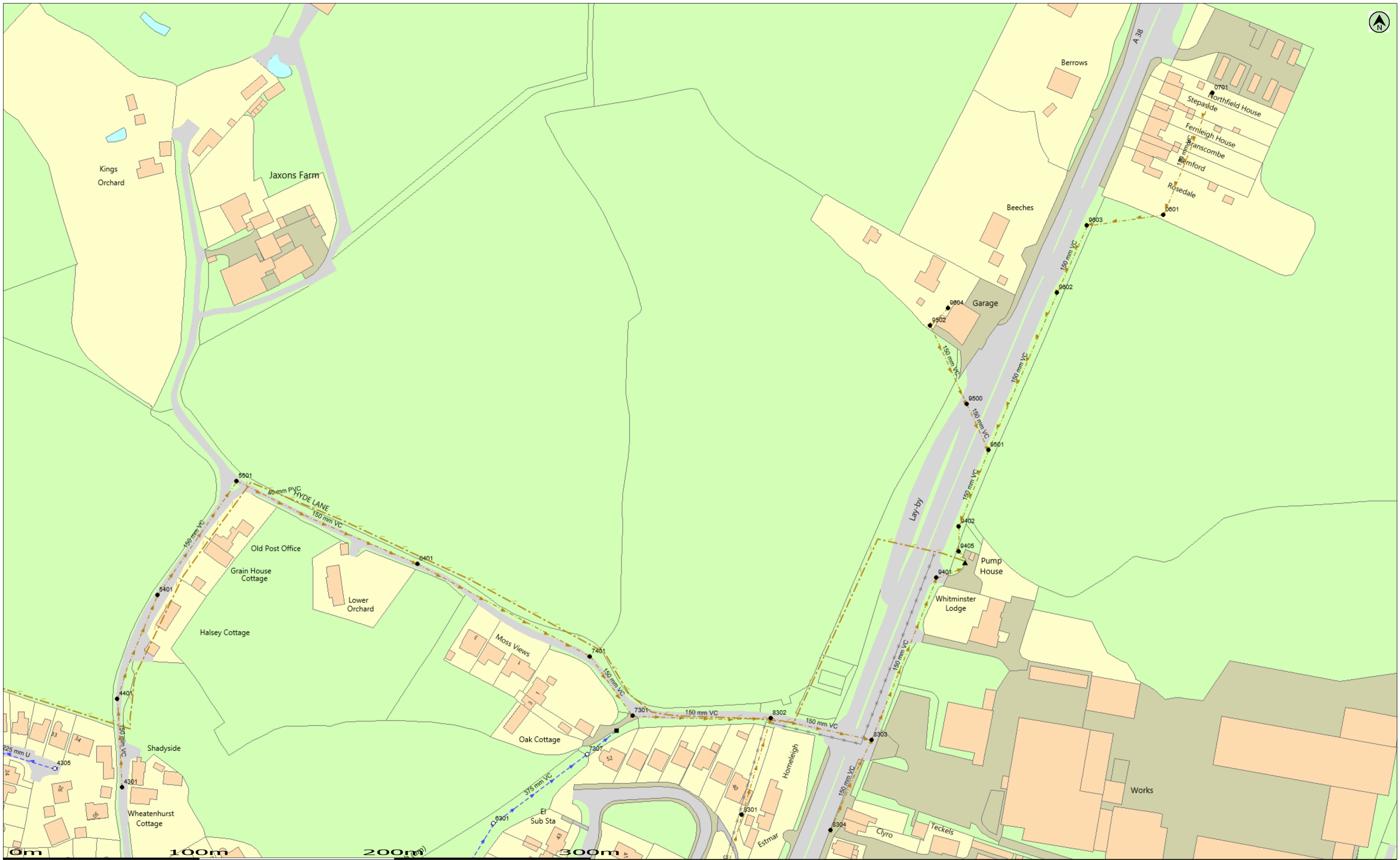
5. **Stage 5 – Resistant/resilient building techniques**
In accordance with best-practice guidance, including BS85500 'Flood Resistant and Resilient Construction' and Department for Communities and Local Government 'Improving the Flood Performance of New Buildings' (2007)
6. **Stage 6 – Safety**
Safe access and egress should be provided over the lifetime of the development (i.e., a route to Flood Zone 1).

Appendix A – Site Elevation (x1 page)

Hyde Lane, Whitminster, Stroud, Site Elevation



Appendix B – Severn Trent Sewer Asset records (x1 page)



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Public Foul Gravity/Lateral Drain	Highway Drain	Manhole Foul
Public Combined Gravity/Lateral Drain	Overflow Pipe	Manhole Surface
Public Surface Water Gravity/Lateral Drain	Disposal Pipe	Abandoned Pipe
Pressure Foul	Culverted Water Course	Sections 104 sewers are shown in green
Pressure Combined	Pumping Station	Private sewers are shown in magenta
Pressure Surface Water	Fitting	



GENERAL CONDITIONS AND PRECAUTIONS TO BE TAKEN WHEN CARRYING OUT WORK ADJACENT TO SEVERN TRENT WATER'S APPARATUS

- b) Please be aware that due to The Private Sewers Transfer Regulations June 2011, the number of public sewers has increased, but many of these are not shown on the public sewer record. However, some idea of their positions may be obtained from the position of inspection covers and their existence must be anticipated.
- c) On request, STW will issue a copy of the plan showing the approximate locations of STW Apparatus although in certain instances a charge will be made. The position of private drains, private sewers and water service pipes to properties are not normally shown but their presence must be anticipated. This plan and the information supplied with it is furnished as a general guide only and STW does not guarantee its accuracy.
- d) STW does not update these plans on a regular basis. Therefore the position and depth of STW Apparatus may change and this plan is issued subject to any such change. Before any works are carried out, you should confirm whether any changes to the plan have been made since it was issued.
- e) The plan must not be relied upon in the event of excavations or other works in the vicinity of STW Apparatus. It is your responsibility to ascertain the precise location of any STW Apparatus prior to undertaking any development or other works (including but not limited to excavations).
- f) No person or company shall be relieved from liability for loss and/or damage caused to STW Apparatus by reason of the actual position and/or depths of STW Apparatus being different from those shown on the plan.

In order to achieve safe working conditions adjacent to any STW Apparatus the following should be observed:

1. All STW Apparatus should be located by hand digging prior to the use of mechanical excavators.
2. All information set out in any plans received from us, or given by our staff at the site of the works, about the position and depth of the mains, is approximate. Every possible precaution should be taken to avoid damage to STW Apparatus. You or your contractor must ensure the safety of STW Apparatus and will be responsible for the cost of repairing any loss and/or damage caused (including without limitation replacement parts).
3. Water mains are normally laid at a depth of 900mm. No records are kept of customer service pipes which are normally laid at a depth of 750mm; but some idea of their positions may be obtained from the position of stop tap covers and their existence must be anticipated.
4. During construction work, where heavy plant will cross the line of STW Apparatus, specific crossing points must be agreed with STW and suitably reinforced where required. These crossing points should be clearly marked and crossing of the line of STW Apparatus at other locations must be prevented.
5. Where it is proposed to carry out piling or boring within 20 metres of any STW Apparatus, STW should be consulted to enable any affected STW Apparatus to be surveyed prior to the works commencing.
6. Where excavation of trenches adjacent to any STW Apparatus affects its support, the STW Apparatus must be supported to the satisfaction of STW. Water mains and some sewers are pressurised and can fail if excavation removes support to thrust blocks to bends and other fittings.
7. Where a trench is excavated crossing or parallel to the line of any STW Apparatus, the backfill should be adequately compacted to prevent any settlement which could subsequently cause damage to the STW Apparatus. In special cases, it may be necessary to provide permanent support to STW Apparatus which has been exposed over a length of the excavation before backfilling and reinstatement is carried out. There should be no concrete backfill in contact with the STW Apparatus.
8. No other apparatus should be laid along the line of STW Apparatus irrespective of clearance. Above ground apparatus must not be located within a minimum of 3 metres either side of the centre line of STW Apparatus for smaller sized pipes and 6 metres either side for larger sized pipes without prior approval. No manhole or chamber shall be built over or around any STW Apparatus.
9. A minimum radial clearance of 300 millimetres should be allowed between any plant or equipment being installed and existing STW Apparatus. We reserve the right to increase this distance where strategic assets are affected.
10. Where any STW Apparatus coated with a special wrapping is damaged, even to a minor extent, STW must be notified and the trench left open until the damage has been inspected and the necessary repairs have been carried out. In the case of any material damage to any STW Apparatus causing leakage, weakening of the mechanical strength of the pipe or corrosion-protection damage, the necessary remedial work will be recharged to you.
11. It may be necessary to adjust the finished level of any surface boxes which may fall within your proposed construction. Please ensure that these are not damaged, buried or otherwise rendered inaccessible as a result of the works and that all stop taps, valves, hydrants, etc. remain accessible and operable. Minor reduction in existing levels may result in conflict with STW Apparatus such as valve spindles or tops of hydrants housed under the surface boxes. Checks should be made during site investigations to ascertain the level of such STW Apparatus in order to determine any necessary alterations in advance of the works.
12. With regard to any proposed resurfacing works, you are required to contact STW on the number given above to arrange a site inspection to establish the condition of any STW Apparatus in the nature of surface boxes or manhole covers and frames affected by the works. STW will then advise on any measures to be taken, in the event of this a proportionate charge will be made.
13. You are advised that STW will not agree to either the erection of posts, directly over or within 1.0 metre of valves and hydrants,
14. No explosives are to be used in the vicinity of any STW Apparatus without prior consultation with STW.

TREE PLANTING RESTRICTIONS

There are many problems with the location of trees adjacent to sewers, water mains and other STW Apparatus and these can lead to the loss of trees and hence amenity to the area which many people may have become used to. It is best if the problem is not created in the first place. Set out below are the recommendations for tree planting in close proximity to public sewers, water mains and other STW Apparatus.

15. Please ensure that, in relation to STW Apparatus, the mature root systems and canopies of any tree planted do not and will not encroach within the recommended distances specified in the notes below.
16. Both Poplar and Willow trees have extensive root systems and should not be planted within 12 metres of a sewer, water main or other STW Apparatus.
17. The following trees and those of similar size, be they deciduous or evergreen, should not be planted within 6 metres of a sewer, water main or other STW Apparatus. E.g. Ash, Beech, Birch, most Conifers, Elm, Horse Chestnut, Lime, Oak, Sycamore, Apple and Pear. Asset Protection Statements Updated May 2014
18. STW personnel require a clear path to conduct surveys etc. No shrubs or bushes should be planted within 2 metre of the centre line of a sewer, water main or other STW Apparatus.
19. In certain circumstances, both STW and landowners may wish to plant shrubs/bushes in close proximity to a sewer, water main of other STW Apparatus for screening purposes. The following are shallow rooting and are suitable for this purpose: Blackthorn, Broom, Cotoneaster, Elder, Hazel, Laurel, Privet, Quickthorn, Snowberry, and most ornamental flowering shrubs.



clarkebond

MULTIDISCIPLINARY ENGINEERING CONSULTANTS



APPENDIX H
PREVIOUS REPRESENTATIONS TO THE ADDITIONAL HOUSING OPTIONS CONSULTATION

ON BEHALF OF REDROW HOMES (SW) LTD

**REPRESENTATIONS TO STROUD DISTRICT
COUNCIL'S LOCAL PLAN REVIEW
'ADDITIONAL HOUSING OPTIONS'
CONSULTATION**

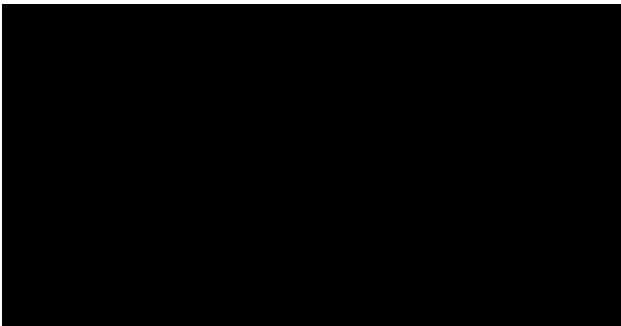
**IN RESPECT TO LAND NORTH OF HYDE
LANE, WHITMINSTER**

December 2020

ON BEHALF OF REDROW HOMES (SW) LTD

**REPRESENTATIONS TO STROUD DISTRICT COUNCIL'S LOCAL PLAN REVIEW
'ADDITIONAL HOUSING OPTIONS' CONSULTATION**

IN RESPECT TO LAND NORTH OF HYDE LANE, WHITMINSTER



Ref: 614/A3/MK/CC
Date: 16th December 2020

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1.0 INTRODUCTION

- 1.1 On behalf of Redrow Homes (SW) Ltd and the landowners, Grass Roots Planning have been instructed to prepare and submit representations to Stroud District Council's (SDC) Local Plan Review 'Additional Housing Options' (AHO) consultation, currently taking place until the 16th December 2020. This is with particular reference to land north of Hyde Lane, Whitminster, which is being promoted by Redrow Homes.
- 1.2 This document sets out our comments and concerns to the emerging Stroud Local Plan Review and the strategy it contains, as further refined in the AHO document. The focus of these concerns relates to the spatial strategy currently adopted, the fact that it relies too heavily on strategic-scale sites and that those selected are not underpinned by robust evidence to demonstrate that they are the most sustainable and viable options to accommodate housing growth in particular.
- 1.3 As part of this document we will set out how we consider the emerging plan fares when considered against the tests of soundness that are set out in paragraph 35 of the NPPF which are as follows:
- a) **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.4 We are pleased to see that Whitminster is being considered as an option under the 'Additional Housing Options' consultation paper but the scale of development anticipated here could be expanded to create a more viable source of supply when compared to the more flawed strategic options we will discuss in this document.
- 1.5 Land north of Hyde Lane, Whitminster (the site) is capable of accommodating circa 200 homes and landscaping / open space within the new Local Plan. This is not an option currently being

considered by SDC but we consider that it could further boost supply at Whitminster, which we consider to be a suitable location for development, and thereby provide an alternative source of supply to compensate for the removal of existing unsound proposed allocations. It would also help to provide a broader portfolio of sites which will allow much needed flexibility and also boost housing numbers if they need to be increased across the District.

1.6 The land at Whitminster and the proposals for it are set out in a series of technical assessments that have been undertaken in support of the development and these should be read in conjunction with this statement:

- Appendix A – Site Location Plan
- Appendix B – Site Access, Junction Visibility Splays, Pedestrian Refuge and Vehicle Refuse Plans
- Appendix C – Ecological Appraisal
- Appendix D – Walking and Cycling Isochrones

1.7 In summary we have a range of concerns regarding the currently proposed spatial strategy and believe it to be unsound for the reasons we will describe. We have examined the previous representations submitted by Barton Willmore in January 2020 and are in broad agreement with their conclusions; as such, we have expanded on a number of their concerns and have responded to the questions raised as part of this consultation, which includes how SDC intend to allocate the additional sites that are required to address increased housing numbers that have been identified as being needed as part of MHCLG 'Standard Method' for determining housing need.

1.8 Primarily we consider that the strategy relies too heavily on strategic-scale sites, and some of the strategic sites it selects are not underpinned by robust evidence to show they are deliverable, particularly in terms of viability. There is also a serious lack of credible evidence to underpin the Council's views that the selected large strategic sites are suitable and sustainable locations for development.

1.9 To address these concerns we consider that the flawed strategic allocations (such as Sharpness and Wisloe) need to be removed from the plan to reduce overreliance on larger sites and further focus provided on the more appropriate location of Whitminster. Additionally a broader and more diverse portfolio of land should be allocated in varying sizes to deliver homes and other development over the next five years and beyond; this should include adding land at Whitminster which will diversify the portfolio of land owners here, and hence potential production outlets, in this sustainable location. We consider that this more diverse portfolio

solution presents the most sustainable and credible option for meeting the increased housing need set out by MHCLG.

- 1.10 Land north of Hyde Lane, Whitminster offers a highly sustainable location for new development which meets the needs of the settlement – we are pleased to see additional growth being considered here as it has been previously overlooked by SDC as a credible option. This site is of a scale that could deliver the critical mass of development to provide new infrastructure for the settlement and sustain everyday facilities and services. It could also be delivered quickly, possibly in advance of the larger strategic allocation to the south to boost housing supply in the short term.

2.0 THE HOUSING REQUIREMENT AND EXISTING SUPPLY

Housing Requirement

2.1 We are pleased to see SDC applying a pragmatic approach to the potential increase in housing numbers connected to the Ministry for Housing, Communities & Local Government (MHCLG) consultation on amendments to the 'Standard Method' of calculating housing need. These amendments were issued in August 2020 and it is positive that SDC are responding to this issue now, rather than progressing with the draft Local Plan Review 'as is'.

2.2 We agree that SDC should be looking to adopt the higher annual needs figure of 786 per annum (15,720 over the 20-year plan period) and we commend the council for taking this positive approach to overall housing delivery.

Existing Supply

Windfalls

2.3 We agree with Stroud's inclusion of windfalls given that this has been monitored over the previous 13 years and shows that consistently they have delivered circa 75 dwellings per annum across the whole district. However, similar to the five-year housing land supply calculations, it is our view that this should only contribute 17 years' worth of delivery to avoid double-counting as small sites with permission must be included within the supply table.

2.4 Accordingly, 1,275 dwellings should be included within the supply and this should reduce by 75 dwellings per annum until the plan is adopted to avoid double counting – for example if the plan is adopted in 2022, 150 dwellings should be removed from the overall supply.

Reserve Supply

2.5 We support the provision of a reserve supply but would suggest that this needs to be quantified and allocated now, so that the plan has flexibility in the long-term should this be required. A clear policy mechanism could be established to set the trigger that would require a consideration of the reserve sites; for example a deficit in five year land supply, or if evidence shows a site currently allocated will not come forward.

3.0 THE CURRENT SPATIAL STRATEGY

3.1 The Local Plan Review 2019 focuses growth on Cam and Dursley, Stonehouse, the southern Gloucester fringe and Stroud, followed by two new settlements at Sharpness and Wisloe. Employment growth has been focused on accessible locations within the A38 / M5 corridor.

3.2 Settlements have been divided into tiers, with Whitminster described as a Tier 3a settlement.

3.3 An extract of the proposed allocations in the Local Plan Review document (2019) is shown below:

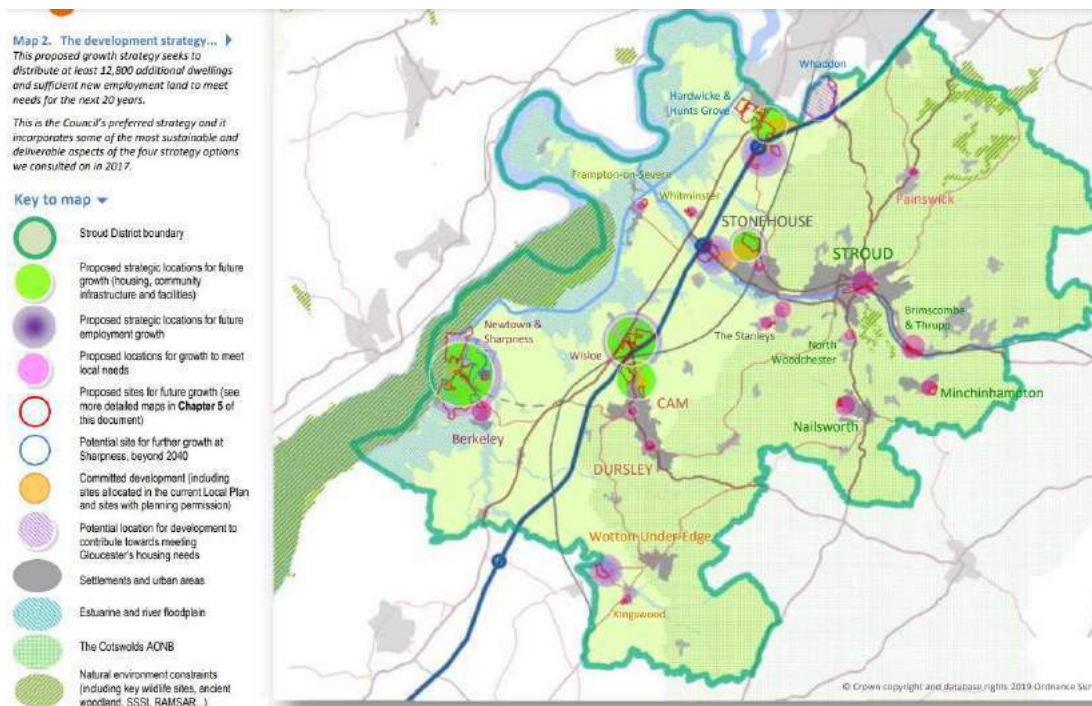


Figure 1. Proposed Development Strategy for Stroud

3.4 As the map clearly shows, there is no significant planned development for Whitminster in the current Local Plan – only two allocations at Land west of Upton's Gardens for 10 units (PS45) and Land west of School Lane for 30 dwellings (PS46). This is inappropriate given the scale of the existing settlement, the affordable needs that will be arising from this population and the sustainability merits of the location in terms of the ability to maintain and strengthen public transport provision. We are therefore pleased to see consideration being given to an additional growth point at Whitminster.

Strategic Sites

- 3.5 We have also considered the type and mix of supply anticipated to come forward over the next twenty years in Stroud. Housing need and anticipated supply was set out in the Draft Local Plan 2019 as follows:

Calculating our residual housing requirement up to 2040 ▼			
Supply	A	Large sites commitments, at April 2019 (on sites with permission / under construction)	5,044
	B	Small sites commitments, at April 2019 (on sites with permission / under construction)	532
	C	Other firm commitments, at April 2019 (on sites subject to resolutions to grant permission)	164
	D	Total commitments (= A + B + C)	5,740
	E	Commitments (D) minus undeliverable sites	5,223
Requirement	F	Housing requirement 1 April 2019 to 31 March 2020	456
	G	Draft housing requirement 1 April 2020 to 31 March 2040 (= 638 pa x 20 years)	12,760
	H	Minimum residual housing requirement to 2040 (= F + G - E)	7,993
		Allocated sites in Draft Local Plan	8,725
		Small sites allowance (75 pa x 18 years)	1,350
		Total housing supply in Draft Local Plan	10,075

Figure 2. Extract of Draft Local Plan 2019

- 3.6 Of the proposed allocations, there were a significant proportion of strategic sites which are set out below. This does not take into account existing strategic-scale commitments or allocations proposed as part of the Local Plan 2015, the proposed allocation at Whaddon put forward in the 2019 Local Plan Review document (2,500 homes) to meet the needs of Gloucester City, nor the AHO being considered in this consultation at Whitminster (2,250 homes) or Moreton Valence (1,500 dwellings).

Strategic sites ▼	Number of dwellings at each
Cam North West	700
Cam North East Extension	180
South of Hardwicke	1,200
Hunts Grove Extension	750
Sharpness Docks	300
Sharpness	2,400 (5,000 by 2050)
Stonehouse North West	650
Wisloe	1,500
Local sites at smaller settlements ▶	1,045 (cumulative)
Total	At least 8,700

Figure 3. Proposed Strategic Scale Allocations in Draft Local Plan 2019

3.7 By removing extant permissions (some of which will be coming forward on strategic-scale allocations in any event), strategic sites make up 7,680 dwellings of the total new supply set out in the 2019 draft plan. This equates to 50% of the total number of dwellings anticipated to come forward (15,298 homes once taking into account commitments) and 76% of the allocations and windfalls proposed (10,075), which is an extremely high proportion of overall growth and in our view represents a significant over reliance on such sites.

3.8 We have compared this to other authorities within the region and note that the proportion attributed to strategic allocations is significantly lower, as shown below in table 1:

Table 1. Comparison of proportion of strategic-scale allocations in other authority areas

	Stroud Local Plan Review (2019 draft plan)	Cotswold District Council (2011 – 2031)	South Gloucestershire Council (2006 - 2027, adopted in 2013)	Tewkesbury, Cheltenham & Gloucester Joint Core Strategy
Housing Need	12,800	8,400	28,355	35,254
Total Supply	15,298	9,614	28,850	31,824
Number of dwellings from Strategic Allocations (over 500 units)	7,680	1,800	10,400	11,400
% of Total Supply	50%	19%	36%	36%

3.9 If the AHO sites at Whitminster and Moreton Valence are also allocated without any of the other unsuitable allocations removed such as Wisloe and Sharpness (which we will go onto discuss), the overall proportion of strategic sites goes up even further:

Table 2. Proportion of strategic-scale sites proposed if both AHOs are allocated

Housing Need (MHCLG revised standard method) (786 homes x 20 years)	15,720
Total Supply (includes extant permissions, allocated sites in Draft Local Plan, windfall allowance and potential options at Whitminster (2,250) and Moreton Valence (1,500))	18,420

Number of dwellings from Strategic Allocations (over 500 units)	11,430
% of Total Supply	62%

- 3.10 The inclusion of these sites on top of the existing strategic-scale allocations would result in 62% of overall supply being from this type of site and 82% of the new allocations and windfalls proposed (11,430 homes would be allocated on strategic sites out of 13,825). This makes the overall reliance on such sites rise to a level which does not even come close to other districts in the area and represents an extreme risk to housing delivery SDC in our view.
- 3.11 SDC are therefore relying far too heavily on strategic sites to come forward in a timely fashion to deliver the housing required to meet objectively assessed need and 5YHLS targets. Evidence to date has demonstrated that this is difficult to achieve. The second edition of Lichfield’s paper ‘Start to Finish’ published in February 2020 identifies that sites of over 500 dwellings are anticipated to take 5 – 8.4 years from the outline application being validated to the first home to be delivered. Given the lack of progress on detailed proposals for these sites, with no outline planning applications submitted as yet (with the exception of an application at Sharpness Docks), it’s clear from the Lichfields evidence that the overreliance on strategic sites will push the vast majority of housing delivery into the later part of the plan which will lead to an acute undersupply in its first ten years and then a glut of supply after that point, if the sites selected do actually prove viable.
- 3.12 With consideration of the table above, the number of strategic allocations proposed in Stroud is significantly higher than nearby authorities. South Gloucestershire Council and the Tewkesbury, Cheltenham & Gloucester authorities, whose strategic allocations make up 36% of their overall supply, far lower than Stroud’s, have repeatedly been found unable to demonstrate a five year housing land supply despite having an up-to-date plan. We therefore have concerns over the ability for these sites to deliver identified housing requirements in a logical and sustained way. This is because there are fewer smaller allocations available, which can come forward more quickly and ‘plug’ the gap before large strategic sites come on stream and deliver.
- 3.13 We also have significant concerns about some of the strategic scale sites proposed in the Draft Plan and the AHO, which we go on to describe in the next section. These mainly relate to the limited evidence provided to underpin their suitability, viability and/or deliverability.
- 3.14 In particular, the ‘Assessment of Strategic Development Opportunities in Parts of Gloucestershire’ undertaken by HDH Planning & Development which considers strategic

development options in Stroud (Appendix 6 of this report (December 2019)) states at paragraph 10.52 that *"if the Councils proceed with the inclusion of the large greenfield sites in the future Plans, we suggest a cautious approach as it is not possible to capture the detail of viability (particularly in relation to the infrastructure requirements) of large strategic sites in a high level study of this type. It would therefore be prudent of the Councils to engage with the developers and landowners before relying on these types of site in the future"*.

3.15 Paragraph 67 of the NPPF requires that when identifying land for homes, as part of a plan, authorities planning policies should:

'identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'.

3.16 Another new growth point, as indicated under Option C, is only viable if some existing strategic allocations, such as Sharpness and Wisloe (which are not sustainable and credible options), are removed and replaced with a single, more suitable option, such as a strategic allocation at Whitminster. The housing that would be lost by removing these two strategic scale, but inappropriate allocations, should then be re-distributed as smaller-scale allocations at smaller settlements, such as at Whitminster and Kingswood to provide a greater variety of sites that can come forward more quickly and thereby reduce the over reliance on strategic sites.

3.17 This is because we consider that there is limited evidence associated with the allocations proposed at Sharpness and Wisloe which undermines their credibility; furthermore we have concerns that they are not viable in terms of needing to deliver the infrastructure required to make these places sustainable whilst also delivering the affordable housing needed district wide.

3.18 As we have seen limited evidence in this regard regarding certain particular sites, we consider that the evidence underpinning the Local Plan Review fails to meet PPG which states *"the role for viability assessment is primarily at the plan making stage"*(Paragraph: 002 Reference ID: 10-002-20190509). Therefore, the plan is unsound as it is not justified with such evidence, nor can it be considered that it will be effective without this.

3.19 To address our concerns, we consider that three significant amendments to the plan strategy need to be considered:

- Some of the strategic sites selected need to be reconsidered and removed from the strategy, our view is this should include Wisloe and Sharpness because the evidence

underpinning them is not robust and the viability and commercial attractiveness of both sites has not been proven;

- We consider the capacity of Moreton Valence is overstated and also provides supply where significant growth, at Hunts Grove, has already occurred;
- To compensate for the loss in housing numbers resulting from the reconsideration of these three strategic sites we suggest the following approach is adopted:
 - A much broader portfolio of sites be included in the plan including sites that can be delivered without the large scale infrastructure that the current strategic allocations require;
 - The proposed capacity of Whitminster, the evidence for which is much more robust and compelling, be increased and Redrow's land interest at this location be included in an expanded allocation to circa 2,500 homes.

3.20 In our view, a broader portfolio of sites is required to achieve a balanced range of site sizes and types which will allow development to come forward in future years to meet the need required. Currently we do not consider the portfolio, with its significant over reliance on strategic sites, meets the Economic Objective set out in the NPPF (Paragraph 8) to:

'help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth'.

3.21 When considering the four different spatial options set out in the 'Additional Housing Options' consultation paper for allocating additional housing land therefore, we are of the opinion that Option A (intensifying existing allocations) is not credible unless there has been significant technical work and masterplanning undertaken to demonstrate the increase in units is achievable without resulting in adverse effects, as otherwise it will involve placing further pressure on existing allocations, mainly strategic in scale, to deliver the housing needed to ensure the plan is sound. This does not achieve the NPPF's guidance which requires a balanced portfolio of sites to be delivered and that the strategy be underpinned by evidence – because the evidence around such a strategy (the Lichfield's 'Start to Finish' paper in particular) suggests it will push housing delivery to the back end of the plan period which is not an effective and justified strategy, and is therefore unsound.

4.0 COMMENTS ON SPECIFIC ALLOCATIONS

Cam / Wisloe

- 4.1 There is an existing allocation in Cam for 450 dwellings to the north-east which has been granted planning permission under application ref: S.15/2804/OUT, of which 3 dwellings have been completed to date, according to the most up-to-date 5YHLS paper. The Local Plan Review seeks to allocate a further 700 dwellings under the 'Cam North West' allocation and 180 dwellings at the 'Cam North-East Extension', equating to a strategic allocation of 1,604 homes over the next 20 years.
- 4.2 In addition to this, the proposed allocation at Wisloe for 1,500 also lies in close proximity (circa 800m from Cam's boundary) to the northern edge of Cam and effectively will be the same market. The brings a total of 3,180 dwellings over the next twenty years which is a significant expansion of this settlement and in our view an oversupply in a tightly defined geographic area.
- 4.3 We do not consider that the allocation at Wisloe is credible at this time for a number of reasons.

Deliverability

- 4.4 Firstly, the land ownership plans and promotion material submitted to date is extremely limited and no technical evidence appears to have been provided to underpin it's ability to be viable and deliverable. An extract of the land ownership plan is below; whilst the document states it is 'jointly' owned by the Ernest Cook Trust and Gloucestershire County Council (GCC) this is somewhat misleading as they actually own different land parcels which make up the site.



Figure 4. Extract of Wisloe Garden Village promotion material which shows the different land ownerships

- 4.5 It is also unclear from the information available whether any sort of agreement has been reached between the owners in respect to equalisation, to ensure the site will be delivered comprehensively with infrastructure properly planned and paid for, rather than in a piecemeal fashion. There is no framework masterplan available within the Vision Document which shows how the constraints have informed the layout for the site, and that the delivery of 1,500 is actually achievable. There also appears to be no partnership with a housebuilder or an affordable housing provider to deliver these houses.
- 4.6 Accordingly, we have significant issues with this allocation given the clear lack of evidence associated with it relating to viability or deliverability.

Land Uses Proposed

- 4.7 Paragraph 2.52 of the Draft Local Plan Review 2019 states that *'the latest job forecasts for the District suggest the need to plan for between 2,300 and 6,300 net new jobs'*. This is a very broad target and it is our view that SDC needs to be planning for the higher level of jobs to have an ambitious plan that will address issues of out-commuting to other areas in the region. It is then stated that 14.4 hectares of employment land will need to be delivered but this is not translated into numbers of jobs; it is therefore unclear whether the targets set out in paragraph 2.52 are being achieved.

- 4.8 According to the Settlement Role and Function Study Update (2018) prepared by SDC we note that Cam and Dursley currently has an imbalance in respect to jobs and economically active people, with a ratio of 0.47 jobs to 1 economically active resident.. Therefore, any development in this location should seek to redress the imbalance of jobs and workers and reduce the level of out-commuting to other settlements which contributes to significant CO2 emissions and congestion arising from those travelling to and from work via private car.
- 4.9 The significant allocations at Cam and Wisloe therefore should be including employment land within them, currently we note that the extent of this is extremely limited and our view is that the delivery of these sites will result in significant numbers of economically active people having to travel outside of the settlement for work. This needs to be rectified either through removing these sites (which for other reasons, we do not think Wisloe is credible anyway) or the policy requirements changed to include further allocations of employment land. In turn, this will likely have a knock-on effect on the masterplanning for these sites and a reduction in their potential housing yields.
- 4.10 We have calculated this based on a number of reasonable assumptions which are as follows:
- According to the Settlement Role & Function Study prepared by SDC, there were 4,150 local workers (economically active people) and 1,980 local jobs in 2018, equating to a ratio of 0.47 : 1.
 - Within the Draft Local Plan 2019 (Table 1, page 12), it states that there are 53,078 dwellings in Stroud and 66,700 economically active people, equating to a ratio of 1.25 economically active resident per dwelling;
 - National statistics state there are 24.4 million dwellings (Dwelling Stock Estimates 2019) and 34.1 economically active people (NOMIS labour market), equating to a ratio of 1.4 economically active residents per dwelling;
 - The new allocations at Cam (880 dwellings) plus Wisloe (1,500 dwellings) therefore results in between 2,975 and 3,332 economically active people coming to the area (using either a ratio of 1.25 or 1.4). In addition, the existing allocation at NE Cam will produce a further 563 – 630 local workers because this is yet to be built out.
- 4.11 General guidance from the Roger Trym Report (2004) states that only a third of any employment allocation land take is actually used for employment purposes. Therefore, despite the existing allocation for NE Cam incorporating 10 hectares of employment land in the policy requirements, the masterplan for the application only shows 34,665m² of employment space for B1, B2, and B8 purposes, which is significantly lower.

- 4.12 Taking an average of the Employment Densities Guide 2010 full-time employee per m² for these uses, this equates to 990 jobs. The allocation at Wisloe incorporates 5ha of land – taking the same assumptions, this will equate to circa 430 jobs. The other allocations at Cam do not include any employment land provision.
- 4.13 On a very basic level therefore, the proposals at Cam when completed could provide a total of 8,000 economically active residents in an area with only 3,400 jobs available, worsening the ratio of jobs to workers to 0.42 : 1, further exacerbating the issue of out-commuting, an outcome which national planning policy seeks to avoid. It should also be noted that the Scoping Report issued for the north-western allocation at Cam states that they intend to deliver 1,100 dwellings at this allocation, rather than 880, which means this issue could be even further exacerbated.
- 4.14 The plan needs to be more ambitious in its ability to address this issue if SDC are serious about addressing the Climate Change Emergency; in our view the current strategy for the Cam area is an unsustainable approach and will exacerbate existing problems associated with out-commuting. This does not appear to have been considered in any of the representations or work undertaken to date by SDC and has not been considered from a masterplanning perspective in terms of land-take.
- 4.15 We also have concerns relating to the technical work underpinning the allocation at Wisloe and the constraints associated with the land, including highways, landscape, agricultural land, noise, and utilities.

Highways Impact

- 4.16 As highlighted above, Cam is going to experience a significant amount of development over the next twenty years. In addition, the allocation of land at Wisloe will put further pressure on the existing highways and to date we have seen no evidence to demonstrate that this will not cause significant adverse effects on the road network from the provision of over 3,000 dwellings at this location.
- 4.17 Paul Basham Associates who are supporting Redrow Homes on technical highways matters have considered this issue and note that, whilst improvements to the north-bound on-slip at Junction 13 of the M5 were secured as part of an application in 2014, the Infrastructure Delivery Plan (2020) notes that traffic at the junction is expected to increase 'substantially'. The impact of additional allocations in this area is likely to significantly burden this junction to around 90% capacity in the morning peak and 92% capacity in the evening peak.

4.18 Whilst some mitigation options have been considered the proposed improvements are yet to be agreed with Highways England and this could present a significant constraint to development in this location.

Landscape / Coalescence

4.19 The allocation at Wisloe does not appear to have been assessed as part of any landscape sensitivity assessment undertaken by SDC. The evidence underpinning the allocation in this regard is therefore significantly lacking – as the map below shows the last work undertaken was in 2016 and did not assess any land beyond the M5 to the north-west. The 2019 update does not reference the land at Wisloe and the site does not appear to have been assessed in landscape terms. The evidence prepared by the promoters to date is also extremely limited, with the exception of the vision document which states *"the surrounding is very flat with ground only rising another 2-3km to the east. This allows long distance views to the horizon. On site, hedgerows are fragmented and poor quality"*. It can be seen from the image below that the land on the south-eastern edge of Slimbridge was given a medium/high sensitivity to change in 2016 – it is therefore possible that the land proposed as part of the allocation at Wisloe also has a similar sensitivity, or potentially higher.

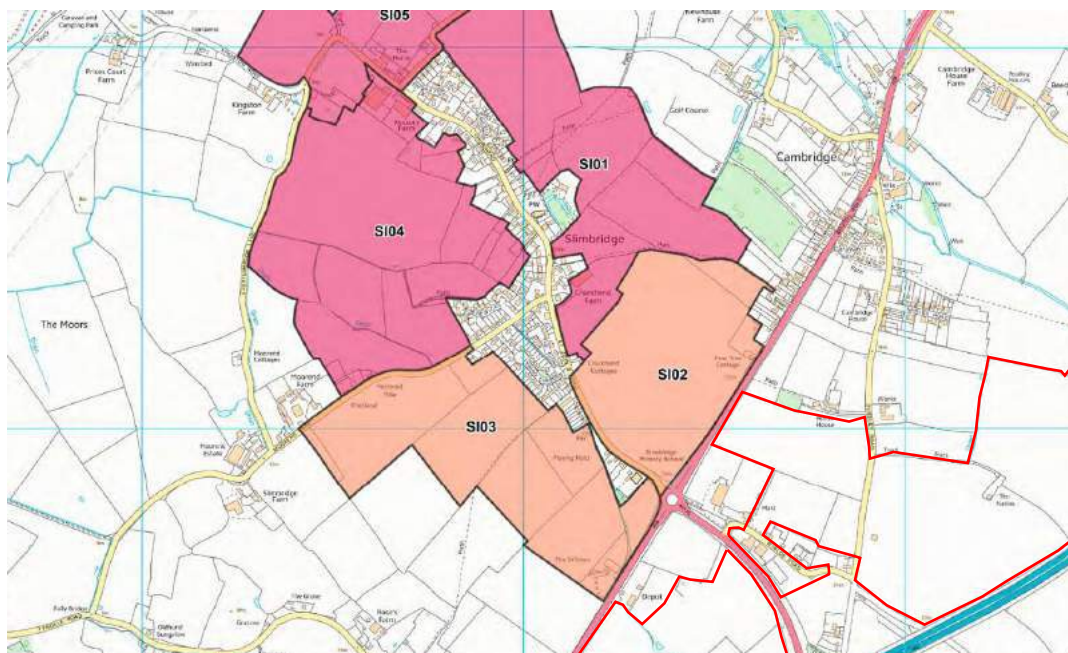


Figure 5. Extract of SDC's Landscape Sensitivity Assessment 2016 (part of Wisloe allocation shown in red) – no updates appear to have been undertaken in support of the Local Plan Review

4.20 Before any decision on such a large scale allocation is made a full and objective assessment of the landscape sensitivity of the site needs to be undertaken by SDC which would inform

the masterplan of any constraints. Without this information, it is unclear how credible it is to say that the 1,500 dwellings will be delivered without significant adverse landscape impacts.

- 4.21 Further to this, the proposed allocation at Wisloe sits between existing settlements, including Slimbridge, Cambridge, and Cam / Dursley. No assessment of the issue of coalescence, or perceived coalescence, appears to have been undertaken. Again, there could be significant negative impacts which are yet untested in regard to this issue.

Agricultural Land Quality

- 4.22 The majority of the land appears to be Grade 2 Agricultural Land Quality, as shown below in figure 6 (MAFF data, extract taken from ArcGIS mapping system). We note the Wisloe Action Group's previous representations which state that an independent assessment has been undertaken by Soil Environmental Services Ltd which states the land is Grade 3b – we have been unable to obtain a copy of this but would raise this as a potential constraint to the land's development. Grade 2 land is considered to be the Best and Most Versatile Agricultural Land and The NPPF advises against its loss for development (see paragraph 170).



Figure 6. Extract of Agricultural Land Quality Maps which show the majority of the Wisloe allocation is Grade 2 (light blue) with a small proportion Grade 3 (approximate site area shown in red)

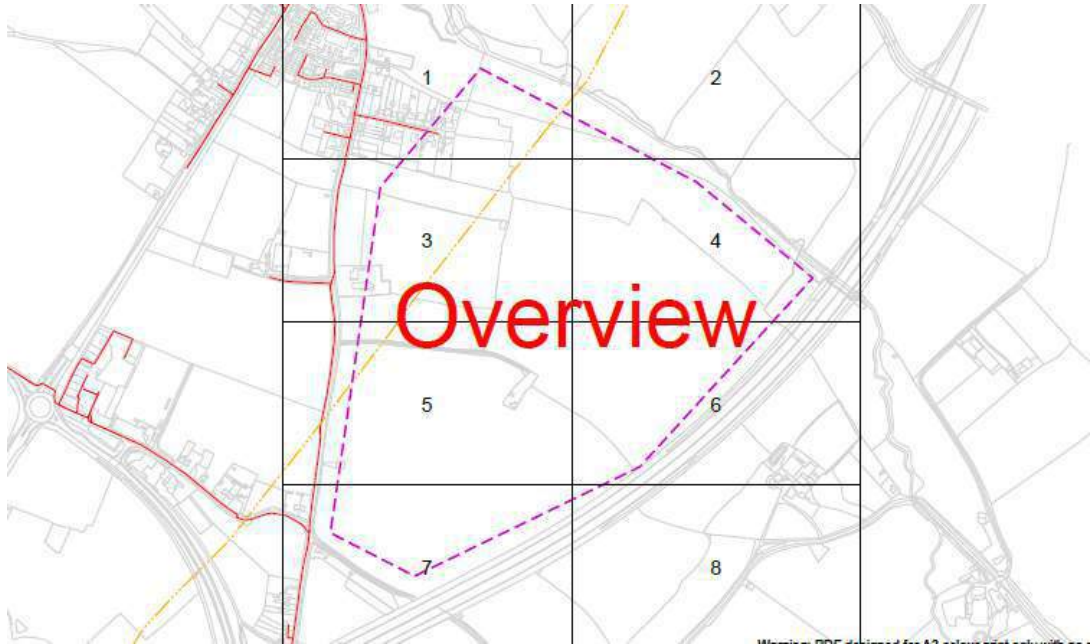
Noise

- 4.23 We have been unable to find any technical assessment of noise issues at the site despite there being reference to such an assessment being made in the Peter Brett Associates (now

Stantec) representations. Whilst we don't believe that this will create an undeliverable scheme it does present a constraint to the development and it is highly likely that a substantial buffer, bund and / or barrier will need to be created adjacent to the M5 to ensure there will be no adverse impact in terms of amenity on future local residents. This in turn will have a knock-on effect on the masterplan for the site and we question whether 1,500 is actually achievable once this constraint is taken into account.

Utilities

- 4.24 We note that there are a number of utilities services which cross the bulk of the land at Wisloe, none of which have been referenced as a constraint in the promotion material put forward by the promoters of the land. This includes a High Pressure Gas Main (Wales and West Utilities (WWU) controlled) and overhead electricity cables owned by Western Power Distribution (WPD). These are shown on the maps below in figures 7 and 8.



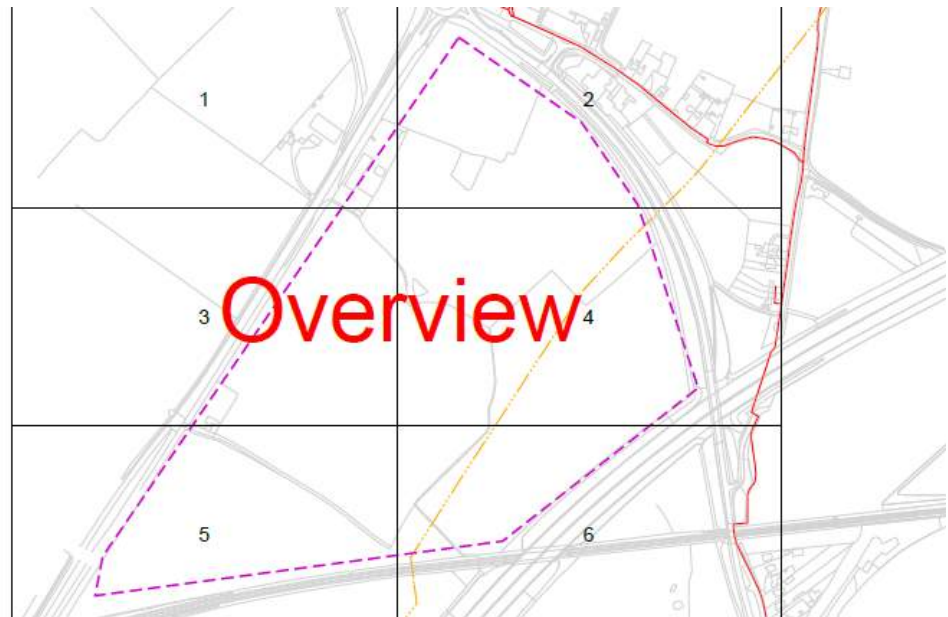


Figure 7. Route of High Pressure Gas Pipe owned by WWU crossing the allocation at Wisloe (shown with orange broken line)

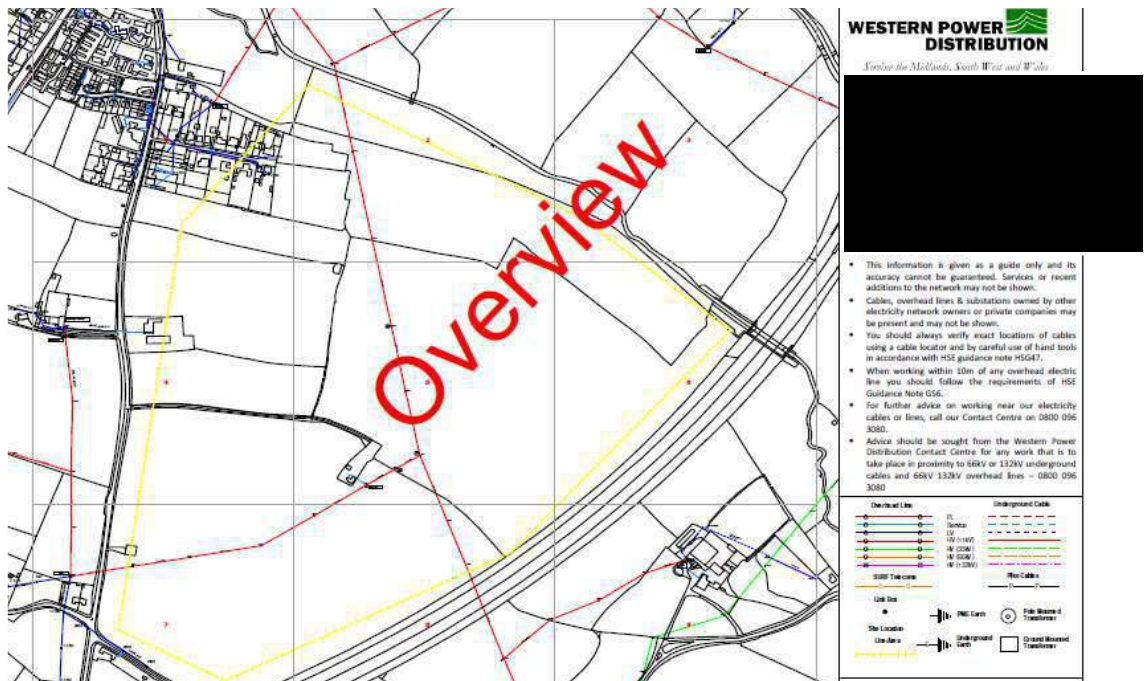


Figure 8. Extract of WPD showing overhead lines / underground cables owned by WPD (red line)

4.25 We can find no evidence of these constraints being considered and how it will impact the masterplan for the allocation, nor any evidence that discussions have been held with the various utilities companies to ascertain how this will be addressed and if relocation is required how much this will cost and how it will be paid for. As such, we again question whether the site is deliverable in the format currently being suggested or whether this will result in a major constraint to the development and therefore the number of homes being able to be delivered in this location.

Conclusion on the allocation at Wisloe

- 4.26 Consequently, we consider that there is an insufficient amount of evidence which underpins the allocation at Wisloe. The limited technical work prepared to date means that its allocation for 1,500 dwellings is unjustified and it cannot be said with any certainty that it can be delivered taking into account the various constraints that apply to the land. We are therefore of the opinion that this allocation should be removed from the Draft Local Plan Review.

Sharpness

- 4.27 Land at Sharpness is separated into two allocations – Sharpness Docks for 200 dwellings and Sharpness for 2,400 homes. As set out within the introduction we have concerns over the lack of technical evidence to date and the commercial viability of this allocation.

Sustainable Transport Links

- 4.28 Our primary concern relating to this allocation is the unsustainable location of the site, as highlighted in the evidence presented by Stagecoach buses as part of the Regulation 18 consultation to the Local Plan.
- 4.29 In particular we have picked up on the comments by them which state the following:

*"We have already made plain to the Councils, as a major rail and bus operator (including of tram and tram-trains) that **we see no business case for such links** [to Sharpness] principally because this very isolation means that they could not credibly offer enough residents a sufficiently attractive and relevant choice to begin to defray the very high fixed costs of operation, whatever delivery mode was used"....*

"As far as the Sharpness Branch Line is concerned, draft policy 5.1 goes as far only to state that the County will "protect the freight lane at Sharpness for future uses". This is no more practical value than the effective policy that the rail industry has had for the line for over 25 years... Simply put, improved services and facilities on the railway through Stroud District lie beyond the power of any local stakeholder to deliver, and there are no well-defined or funded rail industry plans at this time to bring any of the aspirations forward."

"Given the way that the railway has been a key articulating and structuring principle behind some major aspects of the Local Plan strategy, not least the new town at Sharpness Vale, justified until very recently by the claims that it could be sustainably be facilitated by the re-

opening of the Sharpness Branch, this ought to give both the Councils pause for some very serious thought indeed”.

“...We would be quite astonished if the GRIS has concluded that re-opening the Sharpness Branch line to passenger rail services will ever present a justifiable business case, especially when to do so would prejudice future capacity and frequency upgrades on the whole line between Bristol, Gloucester and beyond, serving a vastly wider range of potential trip demands”.

- 4.30 The evidence presented by one of the key bus operators in the District is particularly damning and we have serious concerns over the credibility of Sharpness as an allocation if there is no bus operator willing to provide services to and from the area. The Sharpness Growth Point Transport Strategy undertaken on behalf of Green Square by Peter Brett Associates (now Stantec) states that *'the provision of a comprehensive bus strategy will be vital to ensure the development at Sharpness encourages residents, employees and visitors to use sustainable development modes... it is likely that at least one new bus service will be required' (our emphasis)*. Without this therefore, it is our view that the proposals are unviable and will not adequately contribute to sustainable transport goals. As Stagecoach highlight, whilst Gloucestershire County Council may provide some services, these are “policy-driven rather than demand-driven service designs” (page 17 of their comments), meaning that they only provide very basic routes for essential needs, i.e. those that cannot drive a car. We therefore fail to see how the allocation of land at Sharpness will encourage sustainable transport provision and respond to the Climate Change Emergency.

Viability

- 4.31 In light of the above which in our view is significant and damning evidence that there will be no extensive bus provision at the site, we have also examined the general viability of the scheme at Sharpness in terms of other infrastructure provision. This includes the re-opening of the railway line for a regular service to Cam & Dursley and onwards to Gloucester, and localised road improvements.
- 4.32 We have already set out that there is a lack of jobs available at Cam & Dursley compared to economically active persons which will be exacerbated by the allocations proposed; therefore, it seems illogical to re-open the train line and focus on this connection when the key connectivity will need to be to larger settlements, such as Bristol, which is highlighted in the transport strategy report prepared by Stantec.

4.33 The promoters of land at Sharpness only discuss localised road improvements as part of the development proposed, when, due to this lack of connectivity by rail to the settlements residents will actually need to travel to for work, will force them to travel via private car. This will exacerbate existing issues and create a significant strain on Junctions 13 and 14 of the M5, none of which appears to have been considered in the limited technical work undertaken to date.

4.34 There is also limited evidence to demonstrate that the re-opening of the rail line is feasible, in fact we note the following from the Network Rail representations submitted in January 2020 which state:

'It should be noted that whilst Network Rail is happy to work with the Council and developer to progress this, until the various feasibility studies have taken place, including how this would fit within the timetable, we cannot guarantee this would be plausible. Should the provision of this service and station be feasible, this would be subject to third-party funding.'

4.35 This is significant and suggests that despite the proposals being a draft allocation since November 2018 there has been no progression on these discussions with Network Rail to provide any confidence that the re-opening of this line is achievable. Their comments also highlight that this will be subject to third party funding; it is not clear whether this will be government funding or developer funded, again which causes significant concerns that the project may not be viable.

4.36 Within the Peter Brett Associates Sharpness Growth Point Transport Strategy prepared in 2017, which includes the vital evidence on the suggested infrastructure requirements for the development, they state that the following would be required:

- Upgrade the existing single-track route, which is considered to be unsuitable for a regular passenger service and would require a full upgrade along the 6km length of track;
- Re-establishing the Berkeley loop, which allows for trains to travel south to Bristol which would require a rail bridge over the A38 or a bridge to carry the A38 over the railway; and
- A minimum of one new station to be located in the centre of the proposed development.

4.37 This is a significant level of infrastructure that will require many millions of pounds in investment and the proposals to date put forward by the promoters have only suggested that

the line will be re-opened to Cam & Dursley. Peter Brett Associates stated that the above were minimum requirements; without the provision of a good quality rail network to Bristol and a commitment that the developers of this site will be able to fund it without causing viability concerns, including the provision of affordable housing, we fail to see how this is a sustainable option for growth.

- 4.38 We therefore consider that land at Sharpness should be removed as an allocation because there is little to no evidence demonstrating that the infrastructure required to make it sustainable will come to fruition and there is no viability evidence put forward by the developers of this site to suggest how the infrastructure will be funded.

Moreton Valence

- 4.39 This site lies within close proximity to the initial plan review strategic allocation of land South of Hardwicke (G1) and the additional expansion to Hunts Grove (PS30). We have not seen any robust evidence to suggest that locating such a large amount of development in the same geographical area is commercially viable and will not lead to these various sites competing with each other to a degree that will slow delivery rates and potentially make the delivery of infrastructure to serve them difficult.

- 4.40 The development proposals for the Land to the South of Hardwicke (G1) are very well advanced and the site is supported by a detailed and fully informed constraints and opportunities plan, as well as illustrative masterplan options to demonstrate how the site could be sustainably developed. In addition, EIA Screening & Scoping has been submitted and a response from SDC has confirmed that an EIA is required. A planning application is currently being prepared; therefore, this site should remain in the plan.

- 4.41 The new proposed allocation at Moreton Valence (PGP2), which would compete with site G1, is not underpinned by any robust evidence – with no technical information available as part of this consultation. This is the opposite to the Whitminster proposals which are accompanied by such information.

- 4.42 Separate to the issue relating to the absence of any underpinning technical work, we have the following concerns about site PGP2:

- The site is within multiple ownerships and it is our understanding that it is not associated with a developer, nor has it actively been promoted by a consortium of

landowners to the Council in any co-ordinated or meaningful way. Development proposals for the site are therefore not well progressed.

- The site represents a fragmented potential growth point, with intervening land in multiple ownerships severing the proposed site, and is not capable of being connected across all land parcels and therefore does not allow for a comprehensive development to be planned for or delivered.
- The land is subject to both fluvial and surface water flood risk as figures 9 and 10 below show. NPPF policy (para 155 in particular) requires that such areas should be avoided, and both the surface water and fluvial flow paths sever the site and exacerbate our concerns regarding connectivity and comprehensive development.



Figure 9. Extent of Surface Water Flooding



Figure 10. Extent of Fluvial Flooding

4.43 Therefore, we consider that site G1 should remain within the plan, but the removal of site PGP2 should be carefully considered.

5.0 WHITMINSTER

5.1 Whitminster is identified by SDC as a 'Tier 3a Accessible Settlement with Local Facilities' settlement. The draft Local Plan acknowledges that these are '*relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self-containment*'. Whilst originally there was only limited development proposed in this location for circa 40 dwellings, we are pleased to see an additional growth point and a selection of smaller sites now being considered at this settlement.

5.2 Whitminster has a strong economic role and is a net importer of workers (1.41 jobs per economically active resident), compared to other settlements in the District which see a net export of workers (as table 3 shows below which is an extract of data taken from Stroud's Settlement Role and Function Paper Update 2018). This is only bettered by Kingswood and Stonehouse.

Table 3. Number of Jobs to economically active residents

Settlement	Ratio of Jobs : Workers
Stonehouse	1.75 : 1
Kingswood	1.63 : 1
Whitminster	1.41 : 1
Brimscombe	1.06 : 1
Eastington (Alkerton)	1.06 : 1
Frampton on Severn	1.04 : 1
Upton St Leonards	0.98 : 1
Minchinhampton	0.88 : 1
Stroud	0.84 : 1
Painswick	0.82 : 1
Nailsworth	0.78 : 1
Berkeley	0.72 : 1
Dursley	0.69 : 1
Newton & Sharpness	0.65 : 1
Chalford	0.56 : 1
Uley	0.56 : 1
Wotton-under-Edge	0.53 : 1
Hardwicke	0.51 : 1
Cam	0.47 : 1
Leonard Stanley	0.42 : 1

Kings Stanley	0.41 : 1
Whiteshill & Ruscombe	0.38 : 1
Manor Village (Bussage)	0.36 : 1

5.3 We therefore agree with the proposed allocation of land in Whitminster as a new growth point, however, there needs to be further housing growth to respond to the available number of jobs in the area, to address the balance of net importation of workers. Development here would reduce travel times and provide options for those already working in the Whitminster to live nearby. This strong economic role should also be supported by providing additional housing land, and we therefore welcome the proposal to include 13 hectares of such land as part of the proposed allocation.

5.4 As set out, Stagecoach appear to be supportive of development in locations such as Whitminster, commenting the following in their representations:

"We see a compelling case to extend the "rapid transit" corridor that in the draft LTP terminates at Hardwicke, south into the District along the A38 past Whitminster, at the very least to Stonehouse / Great Oldbury, but also to Stroud".

"... Whitminster seems to have been substantially and incomprehensibly under-rated by the [Settlement Role and Function Study 2018] study, even on the basis of the current service offer. Berkeley, Sharpness and Newton seem to have been systematically over-rated".

"... Whitminster is also relatively close to Gloucester, and offers the immediate prospect of direct, frequent and relatively fast public transport journeys both to there and Stonehouse and Gloucester. The settlement lies directly on the Sustainable Movement Corridor of the A38".

5.5 Given the settlement's location directly off the A38, it would seem logical to place development here where public transport connections can be more easily improved and expanded upon. The alternative approach of seeking to create such improvements in an area like Sharpness, where providers such as Stagecoach have confirmed it would be unviable, is not a justified strategy and is therefore unsound. For the reasons set out, Sharpness should be removed as a proposed allocation and replaced with land at Whitminster, comprising a mix of both strategic-scale and smaller-scale sites.

6.0 **OUR PREFERRED SPATIAL OPTION – ANSWERS TO SPECIFIC QUESTIONS**

6.1 Taking the findings of the preceding sections of this statement, and the previous representations undertaken by Barton Willmore in support of the land at Hyde Lane, we have set out our responses to the questions presented in the 'Additional Housing Options' consultation paper below.

Question 1 – Which strategy option(s) would you support, if additional housing land is required?

6.2 As set out, we commend SDC for taking a pragmatic approach to the increase in housing numbers that will arise from MHCLG's revisions to the proposed standardised method. We therefore consider that additional housing land is required.

Q1a – Option A Intensify

6.3 We have identified a range of factors that have not been properly considered in respect to some of the sites currently selected such as Wisloe and Sharpness (i.e. noise, utilities etc.) and can only accept such an approach where there has been technical work and a comprehensive masterplanning exercise carried out which demonstrates that an uplift in numbers is achievable without compromising the other objectives for the site, or resulting in adverse effects. We are aware that this has been achieved at emerging allocations such as Hardwicke and Stonehouse. This is extremely positive but without this evidence on other allocations, selecting this option would in effect be predetermining a strategy which is an unsound approach.

Q1b – Option B Towns and Villages

6.4 We support this approach but suggest it is combined with another in a 'blended' approach.

Q1c – Option C Additional Growth Point

6.5 We agree that a new growth point can be delivered at Whitminster but it needs to replace currently unsound options, such as Wisloe and Sharpness. We do not consider that there should be further provision over and above what is already proposed as otherwise the plan will rely too heavily on strategic-scale sites.

Q1d – Options D Wider Dispersal

- 6.6 We again broadly agree with this approach but suggest it is combined with another in a 'blended' approach.

Q1e – Would you support a hybrid / combination option?

- 6.7 Yes

Q1f – Can you suggest another strategy / spatial option for the identification of additional housing land?

- 6.8 See answers to Question 2.

Question 2 – If you answered yes to Q1e above, please explain which of the spatial options (A-D) you would like to see combined in a hybrid strategy, and why?

- 6.9 We consider that a blend of all options is the most appropriate, but in terms of allocating additional sites this should be on the edge of settlements which are sustainable and have access to everyday facilities and services, or have an interlinking role with another settlement nearby that provides supporting facilities and employment. Intensification of existing allocations can reasonably occur where there has been an evidence base and masterplanning undertaken to confirm this, such as at Stonehouse and Hardwicke.
- 6.10 Our views are that the strategy should involve the removal of land at Sharpness and Wisloe due to them being unsuitable locations for development which are not underpinned by technical evidence. These should be replaced with a single strategic allocation of land at Whitminster, supplemented by a significant number of non-strategic scale site allocations which can be delivered more quickly, ensuring a five-year housing land supply is maintained and addressing the balance in portfolio of sites. These smaller-scale allocations should include land north of Hyde Road, which we will go onto discuss, and land north of Charfield Road, Kingswood, for reasons we have set out in our separate representations.

Question 3 – Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?

- 6.11 Yes, we agree with this approach, but the reserve capacity needs to be quantified. This ensures further competition in the market and builds-in flexibility in the plan in accordance with the NPPF, ensuring that the tests of soundness to be met and providing a strategy to meet the area's objectively assessed need.

Question 4 – Which strategy option(s) would you support, if a reserve site (or sites) is required?

- 6.12 We have answered this question underneath at Question 5.

Question 5 – If you answered yes to question Q4e above, please explain which of the spatial options (B – D) you would like to see combined in a hybrid strategy, and why?

- 6.13 For similar reasons to the above, we consider that a blended option all options is required, where there is sufficient evidence to demonstrate that the sites are credible and viable. This is to ensure there is in-built flexibility to the plan and to ensure that sufficient homes and other development will be delivered to meet objectively assessed need over the plan period.

Question 6 – What should trigger a reserve site (or sites) coming forward?

- **A delay in an allocated Local Plan site receiving planning permission?**
 - **Failure to deliver housing at the built rates set out in the Local Plan?**
 - **Another trigger**
- 6.14 It is our view that it should be a combination of the options above, plus if a 5YHLS deficit is found to occur. This will allow for a reserve site to quickly come forward to supply any deficiencies in the delivery of homes in the plan.
- 6.15 For example, if the trajectory assumes that an allocated site will start delivering homes in 2023, in our view if this site hasn't received full planning permission by 2022 a reserve site should be triggered to plug the gap and shore up delivery.

Question 7 – Do you support or object to the development of the sites identified?

7a – BER016 Hook Street Farm, Berkeley

7b – BER017 Bevans Hill Farm, Berkeley

- 6.16 We support growth at Berkeley as a Local Service Centre which has significant facilities, services and employment available. We would refer readers to the representations undertaken by Avison Young in respect to specific allocations at Berkeley but agree with their comments that land controlled by Redrow Homes (SW) Ltd is the most suitable option for growth.

7c – HAR017 Land at Sellars Road, Hardwicke

- 6.17 We have no objections to the inclusion of this site given it is a small-scale development on the edge of an existing town which should easily be able to be delivered within five years and is likely to be built by a small to medium-scale housebuilder, which is supported by the NPPF.

7d – STR065 Beeches Green Health Centre

- 6.18 As it has been confirmed that the site is no longer required for operational reasons we support the loss of this health centre to make way for residential development and health and community uses on this brownfield site.

7e – Land south of Hyde Lane, Whitminster

- 6.19 We strongly support growth at Whitminster and as set out in the Stagecoach representations this area has been overlooked in terms of its ability to accommodate growth, its functional relationship with other settlements in terms of the provision of facilities and services and public transport links which are available in the area.
- 6.20 While we have no objection to the allocation of land south of Hyde Lane we consider that land north of Hyde Lane and west of the A38, controlled by Redrow Homes, is a suitable option for development and should also be considered alongside the other allocations being considered in this location.

Question 8 – Are there any other sites that you would like to be considered for future housing development?

6.21 We will go onto discuss the benefits of allocating land north of Hyde Lane, Whitminster, in the next section of this statement.

Question 9 – Do you support or object to the development of the potential growth points identified, or any sites therein?

9a – PGP1 – Land at Grove End Farm, Whitminster

6.22 As set out we support growth at Whitminster given its sustainability credentials and links to the Transport Movement Corridor, which can be more easily enhanced than the infrastructure proposed at Sharpness. Development at Whitminster is supported by Stagecoach who are a major bus operator in the region, whereas they have confirmed there is no business case for extending service provision to Sharpness. This is compelling and damning evidence against this proposal.

6.23 For the reasons set out we suggest that both Wisloe and Sharpness are removed and replaced with strategic growth at Whitminster, as the extent of which should be expanded to include land north of Hyde Lane.

9b – PGP2 – Broad location at Moreton Valence

6.24 We do not support this proposed allocation for the reasons described in paragraphs 4.39 – 4.43 of this document, in summary our concerns are:

- The site is within multiple ownerships and it is our understanding that the site is not associated with a developer, nor has it actively been promoted by a consortium of landowners to the Council in any co-ordinated or meaningful way. Development proposals for the site are therefore not well progressed.
- The site represents a fragmented potential growth point, with intervening land in multiple ownerships severing the proposed site, and is not capable of being connected across all land parcels and therefore does not allow for a comprehensive development to be planned for or delivered.
- The land is subject to both fluvial and surface water flood risk as figures 9 and 10 below show. NPPF policy (paragraph 155 in particular) requires that such areas should

be avoided, and both the surface water and fluvial flow paths sever the site and exacerbate our concerns regarding connectivity and comprehensive development.

- No evidence has been prepared to demonstrate that providing another large source of supply in close proximity to two existing strategic allocations will not flood the market and lead to delay in housing delivery.

Question 10 – Are there any other sites that you would like to be considered as a future growth point?

6.25 We do not consider that further growth points are needed in addition to Whitminster; in fact, the number of strategic sites should be reduced to avoid an overreliance on this source of supply that has acknowledged extensive lead in times and funding challenges. As set out we consider there is further scope for growth at Whitminster to reinforce its strong economic and public transport credentials and propose that Redrow's land interests north of Hyde Lane be added to this allocation.

Question 11 – Do you have any comments to make about the Sustainability Appraisal that accompanies this consultation document?

6.26 We do not have any comments regarding the additional Sustainability Appraisal work which accompanies the consultation document; however, we have some concerns over the original documents in support of the Local Plan which seems to underestimate the lack of credible transport options available at Sharpness.

7.0 **LAND NORTH OF HYDE LANE, WHITMINSTER**

Introduction

7.1 Redrow Homes (SW) Ltd have a commercial agreement in place with the landowners of land north of Hyde Lane. The land is identified on the site location plan which is enclosed as Appendix A to this document and amounts to a total of 7.7 hectares of land.

7.2 The site has been presented as part of representations made on behalf of Redrow Homes during previous consultation stages including the 'Draft Local Plan' consultation undertaken in January 2020.

7.3 The site comprises two parcels of agricultural land which are irregularly shaped and divided and bound by hedgerows. To the south lies the main settlement of Whitminster.

Accessibility

7.4 The site is well located and lies on the urban edge of Whitminster and the A38 to the east. Whitminster itself contains a number of everyday facilities, including a garden centre, clothing shop, primary school, playing fields / football club, pub, camping shop, convenience store and mobile post office service.

7.5 To the east and west of Whitminster lies Stonehouse and Frampton-on-Severn, where there are a multitude of everyday facilities and services capable of meeting everyday needs. This is easily accessible via public transport using the existing bus stops in proximity to the site, which carry services including the numbers 6, 60, 167, 242, 346 and 860 – between them these provide a service level of circa 4 buses per hour.

7.6 The Stagecoach representations submitted earlier this year highlight the potential to expand and improve these services which already see a significant amount of traffic flow in this location with ease, with the strategy for improving this already agreed and costed.

7.7 Proportionate development in this location could therefore support, sustain and enhance existing facilities and services through the provision of the critical mass required to make a viable business case for enhancing and improving infrastructure.

Statutory Designations

- 7.8 The site lies outside of the development boundary of Whitminster but is not designated within the Green Belt, Flood Zone, Conservation Area, SSSI, AONB, Special Landscape Area, Air Quality Management Area or otherwise. The site is therefore unconstrained in terms of policy designations.

Historic Assessment of the Site

- 7.9 The site was assessed as part of the Strategic Assessment of Land Availability (SALA) in 2019 (Ref: WHI010). The site was rejected for the following reason:

"The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site, highly visible to the north and separate from the main part of the settlement in open countryside. There are therefore potential impacts preventing sustainable development in this location".

- 7.10 We consider that through appropriate landscape technical work and adequate mitigation, these issues can be overcome.

Highways

- 7.11 Accessibility has already been discussed above, however in terms of highways safety Clarkebond have assessed the potential access into the site including visibility splays and are comfortable that circa 200 dwellings can be delivered in this location with no adverse impact on the highways network.

Flood Risk & Drainage

- 7.12 The site lies within Flood Zone 1 and is at low risk from flooding, as well as at a low risk from surface water flooding. As such soakaway testing will be undertaken to ascertain whether infiltration is possible across the site as a method of drainage, if not attenuation will be used and discharge to an existing outfall in close proximity to the site.

Ecology

- 7.13 A Phase 1 Ecological Assessment has been undertaken by Green Ecology for the land to the east in December. The assessment identified that there are limited ecological constraints to

this land however additional surveys have been recommended for birds, bats, reptiles, dormice, and Great Crest Newts.

- 7.14 Any assessment will contain a Biodiversity Net Gains Assessment which will seek to demonstrate a net gain in excess of 10%.

Proposed Development

- 7.15 The proposals can accommodate circa 200 dwellings and landscaping / open space opportunities. The proposals will incorporate a mix of dwellings and a policy compliant level affordable housing to meet both Whitminster's, and the wider district's, needs.

8.0 **CONCLUSION**

- 8.1 In summary, we consider that the current Local Plan strategy relies too heavily on strategic-scale sites which have little evidence to underpin them. In particular we have significant concerns over the allocations proposed at Sharpness and Wisloe, and their ability to meet wider sustainability objectives. We also have concerns about the new proposed growth point at Moreton Valence.
- 8.2 It is our view that these sites should be removed and allocations distributed in more sustainable and suitable locations, such as by elevating the allocations at Whitminster to provide additional supply to meet objectively assessed need, in a highly sustainable location that is supported by public transport providers.
- 8.3 These locations already have planned transport improvements which have been agreed and costed with a major bus operator, they will therefore be vast opportunities for alternatives to the private car to access everyday facilities and employment areas. We are therefore pleased to see Whitminster being considered as an area for growth as previously it appears that SDC have overlooked this settlement and its sustainability credentials in previous iterations of the Local Plan Review.
- 8.4 We consider that a 'blend' of all the spatial strategy options is the most appropriate route forward for allocating additional housing sites. Option A is credible only where there has been an extensive level of technical work undertaken and a masterplanning exercise which demonstrates that an uplift in numbers is achievable without there being significant adverse effects of undermining the viability of chosen sites.
- 8.5 With respect to land north of Hyde Lane, technical work to date has not identified any significant constraints to the site's development, with the proposals underpinned by a landscape-led strategy to ensure there will be no adverse effects of the development.
- 8.6 We therefore conclude that land north of Hyde Lane, Whitminster should be allocated for circa 200 dwellings and landscaping / open space, to achieve a mixed and balanced portfolio of sites in accordance with the NPPF as well as delivering homes in an accessible location adjacent to a major employer of Stroud District and in an area where there are already planned transport improvements.