

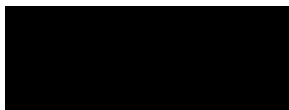
STROUD DISTRICT LOCAL PLAN REVIEW

REPRESENTATIONS TO THE PRE-SUBMISSION DRAFT PLAN (REG 19) CONSULTATION

FOCUS SCHOOL AT WANSWELL, STROUD

ON BEHALF OF WHITECROFT EDUCATION TRUST

Prepared by:



Pegasus Group



PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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1. INTRODUCTION

- 1.1 Pegasus Group is instructed to submit representations on behalf of Whitecroft Education Trust in respect of their site at Focus School, Wanswell, Stroud. Focus School is relocating to Bristol and so the site has some potential for redevelopment. It has, accordingly been allocated for development in the emerging Local Plan (Policy PS35).

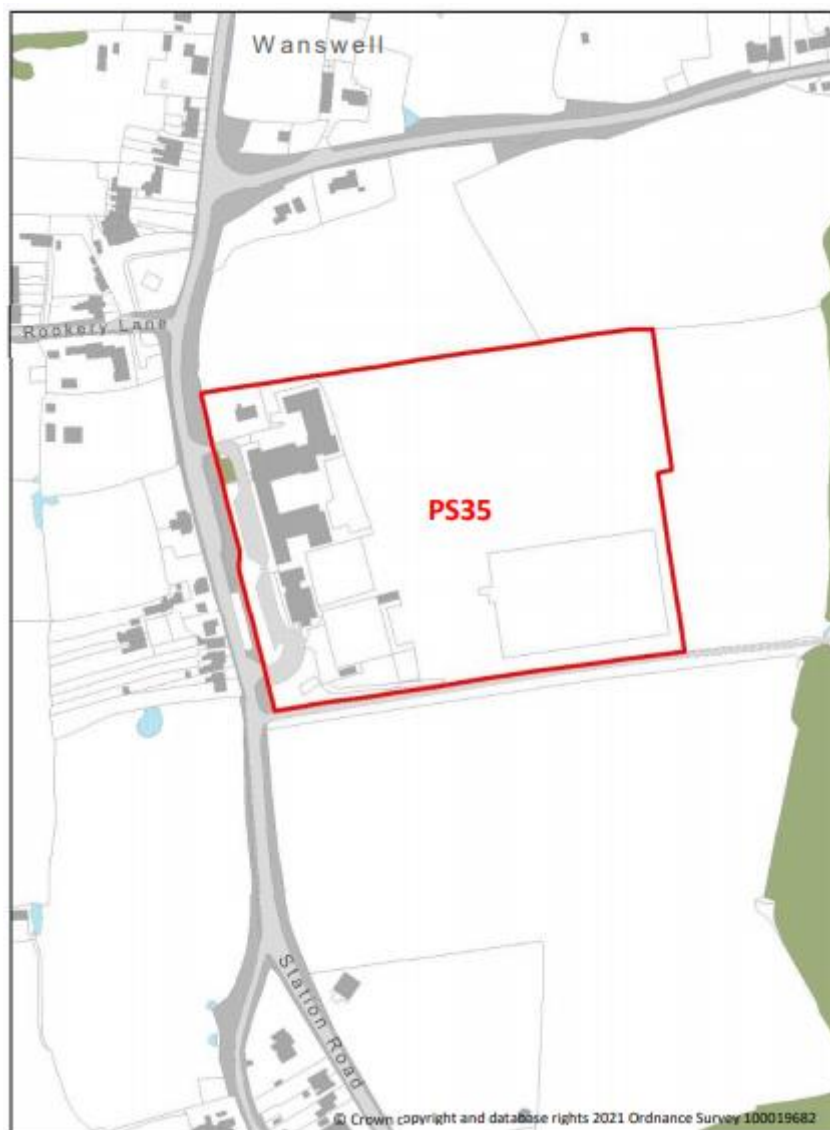


FIGURE 1: SITE LOCATION

- 1.2 However, the proposed allocation only allocates the site for c. 70 dwellings and indicates that the playing fields associated with the school should be retained as

open space for the benefit of residents of the new Sharpness Strategic Development Location.

- 1.3 These representations argue that a higher quantum of development should be allocated on the site to come forward in the short-term as the value generated from a scheme of 70no. dwellings would not generate enough value to make the school's relocation viable. A higher quantum of development would also deliver more affordable housing on the site. There is a significant affordability issue within the district and the emerging plan is simply not ambitious enough in trying to address the issue.
- 1.4 These representations also highlight the lack of evidence behind the Council's decision to allocate part of the site for playing pitches/recreation space. They also show that there are inherent problems with relying on this site to support the social and community infrastructure for the Sharpness New Settlement and that it would be more effective to allocate the site for a comprehensive development with a view to providing this infrastructure elsewhere. As such, Policy PS35 (and the plan as a whole) is not justified and in conflict with Paragraph 35 of the NPPF as a result.
- 1.5 Land at the Focus School should be allocated for development of a minimum of 140 dwellings, public open space and associated works as a result. The trust will be engaging with the adjacent landowner(s) to ensure that the redevelopment of the school site does not prejudice the delivery of the wider SNS. We look forward to working with the Council to bring the site forward for development as the plan progresses.

2. THE DEVELOPMENT STRATEGY (2.5)

- 2.1 We have no major comments on the proposed Development Strategy, beyond supporting the identification of the Sharpness New Settlement (Policy PS36) and the Focus School at Wanswell (Policy PS35) for development.
- 2.2 We also note that there is support for the regeneration of previously used sites and further infill development to maximise the use of brownfield land at these and other settlements, within settlement development limits. Again, this principle is supported on the basis that maximising the use of brownfield sites is generally more sustainable than development on greenfield sites and supported by the NPPF (paragraph 117).
- 2.3 Whilst we agree that 630 dwellings per annum is the minimum housing requirement that should be planned for, we consider that the affordable housing need within the district would justify consideration of a higher annual requirement.
- 2.4 Policy CP9 identifies an unadjusted affordable housing need of 424 dwellings per annum within Stroud. Policy CP9 seeks a minimum of 30% of housing to be delivered as on-site affordable for all major schemes; however, it is clear that this target will not even come close to delivering the 424 dwelling figure.
- 2.5 The minimum annual housing requirement derived from the Standard Method is 630 dwellings. Assuming that 30% of these dwellings are delivered as affordable, this would equate to only 189 dwellings per annum.
- 2.6 However, 75 dwellings per annum are expected to come forward as windfall sites. These sites will typically be minor development sites (<10 dwellings) where affordable housing contributions will not be required. Furthermore, the redevelopment of brownfield sites and the utilisation of vacant building credit can also reduce the level of affordable housing which comes forward, as a percentage of the overall target.
- 2.7 In short, it is likely that the best-case scenario would not even deliver half of the affordable housing the district requires over the plan period. Failing to deliver sufficient affordable housing has significant social and economic consequences. Affordability is already identified as an issue in the Local Plan, one which it claims to address. However, this will be exacerbated under the proposed strategy.

- 2.8 A review of the previous consultation documents and supporting background papers does not indicate that the Council even considered uplifting the housing requirement to more effectively meet the district's affordable housing needs. One infers from the Local Plan Review that the uplift in the housing requirement (from 456 to 630dpa) is so significant that the district could not possibly entertain going higher than this minimum requirement. However, the shortfall in affordable housing delivery that would likely accrue at the end of the plan period is sufficiently significant to at least warrant consideration of a higher housing requirement, *as a minimum*.
- 2.9 Whilst we accept that there are viability and market related constraints which would make meeting affordable housing needs *in full* through an increased housing requirement unlikely, no consideration appears to have been given to this option. Given the potential social and economic consequences of failing to deliver enough affordable housing, it is surprising that this has not even been considered through the Local Plan Review.
- 2.10 It should also be borne in mind that the Council's ability to comfortably demonstrate a five-year housing land supply position over the plan period to date is a reflection of the strong demand for housing against a relatively suppressed housing requirement. Furthermore, the Local Plan Review notes that the district delivered 662 dwellings in 2019/20 which shows exceeding the 630dpa requirement is indeed possible. This is even more impressive given that it was achieved in a context where the Development Plan only seeks to deliver around 456dpa and has allocated land accordingly.
- 2.11 In short, there is an acute need for affordable housing within the district which the emerging plan would not even come close to meeting. No consideration has been given to uplifting the housing requirement to better meet the affordable needs of the district. The Council's good record of housing delivery in recent years suggests that a higher housing requirement could indeed be delivered. There are, therefore, strong reasons why a higher housing requirement could be identified in the Local Plan Review.

This would, in turn, require the identification of additional sites and/or a review of proposed allocations to see if a higher quantum of development can come forward on these instead.

3. SHAPING THE FUTURE OF THE BERKELEY CLUSTER (3.6)

3.1 Development around the Berkeley Cluster is dominated by the new settlement at Sharpness. Strategic growth at Sharpness around the docks, Newtown and the Gloucestershire Science Park is expected to deliver around 2,400 dwellings and 10ha of employment land, as well as other community uses by 2040. A further 2,600 dwellings and supporting uses will come forward beyond 2040 in a second phase. These two phases are identified on page 175 of the draft plan.

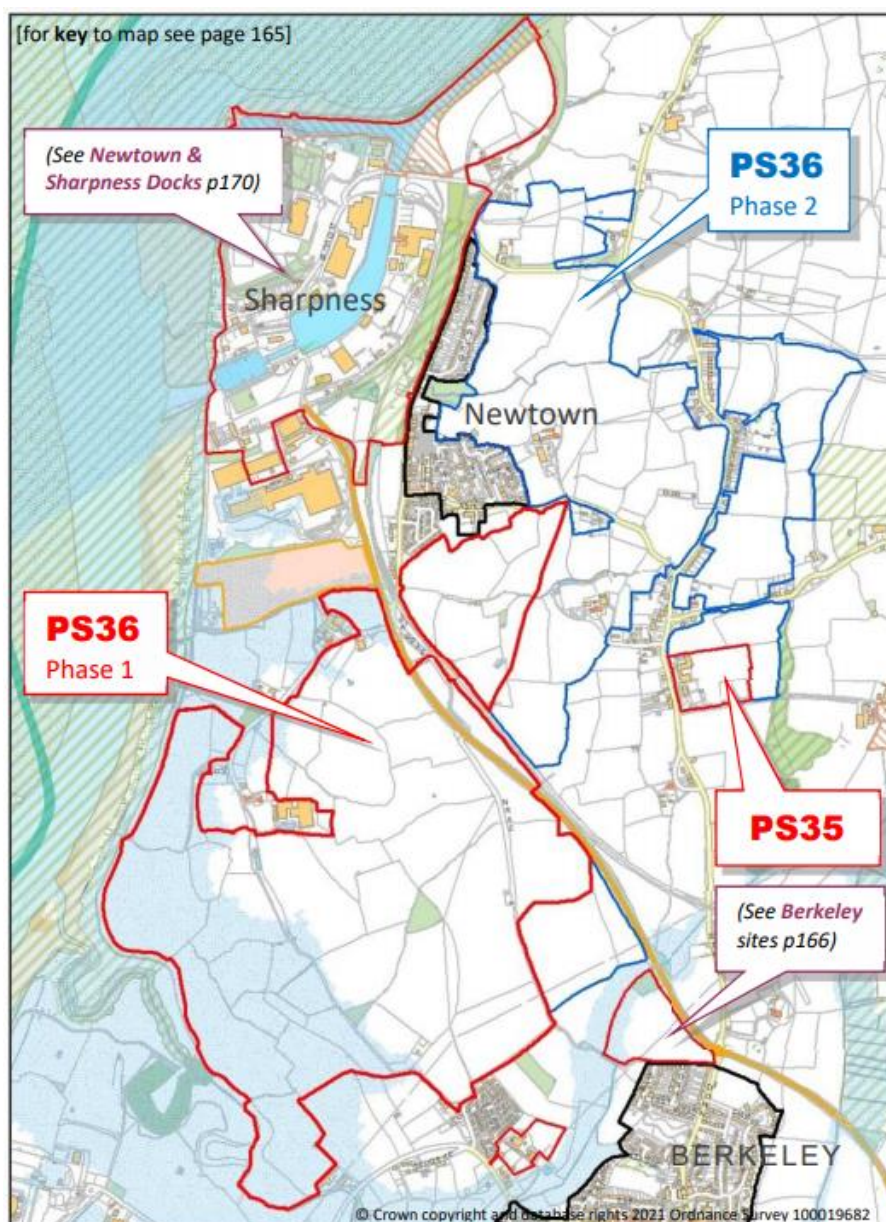


FIGURE 2: POLICY PS35/PS36 EXTRACT

- 3.2 Land identified at Focus School, Wanswell is a standalone development site which is currently allocated for 70 dwellings through its partial redevelopment (Policy PS35).
- 3.3 The school site lies adjacent to land which is identified as Phase 2 of the Sharpness New Settlement (SNS) PS36. Alongside the provision of 70 dwellings, the draft wording indicates that the site will be retained for community use and open space, including the retention and enhancement of existing playing pitches and open space. It goes on to state that redevelopment proposals will need to be considered within the context of the adjacent PS36 site *"to ensure that retained open space meets the specific recreation needs of the wider new community."*
- 3.4 The draft text also indicates that a masterplan will detail the way in which land uses and infrastructure will be developed in an integrated and co-ordinated manner.
- 3.5 In short, we are supportive of the site's allocation for redevelopment; however, there is scope for a more substantial level of development to come forward without prejudicing the delivery of the adjacent strategic development site.

1. A higher quantum of development is required to enable the school to relocate

- 3.6 The revenue generated from the development of the site for 70 dwellings is not sufficient to allow the school to relocate without incurring a significant financial loss. Preliminary viability work as indicated that a scheme of around 120-140 dwellings (or equivalent uses) would be required to generate sufficient revenue to allow the school to relocate whilst maintaining a healthy financial position.
- 3.7 This is partly because of a restrictive overage on the site which limits the value that would be realised from selling the site on the back of a scheme for 70 dwellings. This is exacerbated further by the proportionately higher land acquisition and build costs within Bristol. Without a higher quantum of development, it will not be viable to relocate the school and bring the site forward for development.
- 3.8 Viability evidence can be shared with the Council accordingly to support this position, albeit this will have to be on a strictly confidential basis. We look forward to working proactively with the Council as the plan progresses.

2. There is no obvious reason why the playing fields need to be retained

- 3.9 The playing pitches on the site are associated with the school use. They are not used by local sports teams or generally accessible to the public. Use of the existing facilities is at the school's discretion and so they do not provide a service to the wider community.
- 3.10 Furthermore, beyond the site's identification as an 'education' typology in the Stroud Open Space and Green Infrastructure Study, it is otherwise not identified as making a significant contribution to the open space and green infrastructure assets in the Berkeley Cluster. Furthermore, the site is not listed among the 'Key Sites' in the Playing Pitch Strategy (PPS) Action Plan for the Berkeley Cluster either.
- 3.11 Beyond simply having the 'form' of playing pitches/open space, the facilities do not have an inherent community value that warrants protection. Indeed, it appears that Policy PS35 seeks to retain these playing pitches without assessing their actual importance to the community. The proposals to retain them as playing pitches is, therefore, not justified by the evidence.

3. Allocating the land for playing pitches now would prejudice the master planning for the Sharpness New Settlement (SNS)

- 3.12 The policy and supporting text state that the retention of these playing pitches is required for the benefit of the SNS. However, it also states that a masterplan will need to be agreed with the Council for the new settlement. By specifying the use of this part of the site, the plan effectively pre-determines elements of the master plan before it has been prepared.
- 3.13 Indeed, it may well be the case that locating playing pitches/sporting facilities elsewhere would allow for a more efficient use of land and maximise delivery at the new settlement. For example, it may be preferable to locate playing pitches within areas of Flood Zone 2/3, to maximise the delivery of housing, employment and other supporting uses that can be delivered in Flood Zone 1. The loss of this space would be justified in this instance as it would be offset through the provision of new facilities elsewhere.
- 3.14 It is, therefore, premature to allocate this land for a specific use in support of the new settlement at this stage and to do so would not be justified, effective of consistent with national policy.

4. Deliverability

- 3.15 It is clear that the Council are looking to the release of the residual land at the Focus School to meet the public open space and recreational needs for the SNS. However, it is equally reliant on this land being released for such uses. Again, the land is not publicly accessible open space, nor does it perform an important role within the community. The use of the existing facilities is very much at the school's discretion.
- 3.16 The Council could dramatically simplify the master planning process by ensuring that all the necessary social and community infrastructure is delivered by the dominant landholding(s) with financial contributions from other sites used to ensure that landowners are compensated fairly for enabling development on the site.
- 3.17 This would allow more significant development to come forward on the site in the short-term and remove any potential deliverability issues associated with relying on this land to meet some of the open space and recreational requirements of the SNS.

Summary

- 3.18 Whilst we are supportive of the site's allocation for development, a higher quantum is required to enable the relocation of the Focus School and ensure it maintains a healthy financial position.
- 3.19 Whilst we understand the rationale for looking to retain the school's sports pitches for the benefit of the SNS, there are issues with this approach. The first is that the school pitches do not have any intrinsic community value at present as their use is at the discretion of the school. The Council's own evidence base does not indicate that these facilities are especially important and so the decision to retain them in such uses is not justified by the evidence base.
- 3.20 Furthermore, determining their use as playing fields now would pre-determine the master plan for the SNS. This is neither good planning practice nor supported by national policy.
- 3.21 Finally, the Council face potential deliverability issues in relying on this land to meet the needs of the SNS. Indeed, the more straight forward approach would be to simply ensure the community and social infrastructure needs for the SNS are met

within the dominant landholding(s) with financial contributions from smaller sites (such as the Focus School site) ensuring that the former are fairly compensated for doing so.

4. LAND AT FOCUS SCHOOL, WANSWELL

4.1 Land at the Focus School, Wanswell covers an area of c. 5ha of land to the east of Station Road. The school buildings are clustered within the westernmost part of the site adjacent to Station Road, whilst its associated playing pitches are located within the eastern half of the site. The site would be capable of accommodating between 120-140 dwellings¹ The approximate extent of the landholding is shown below.

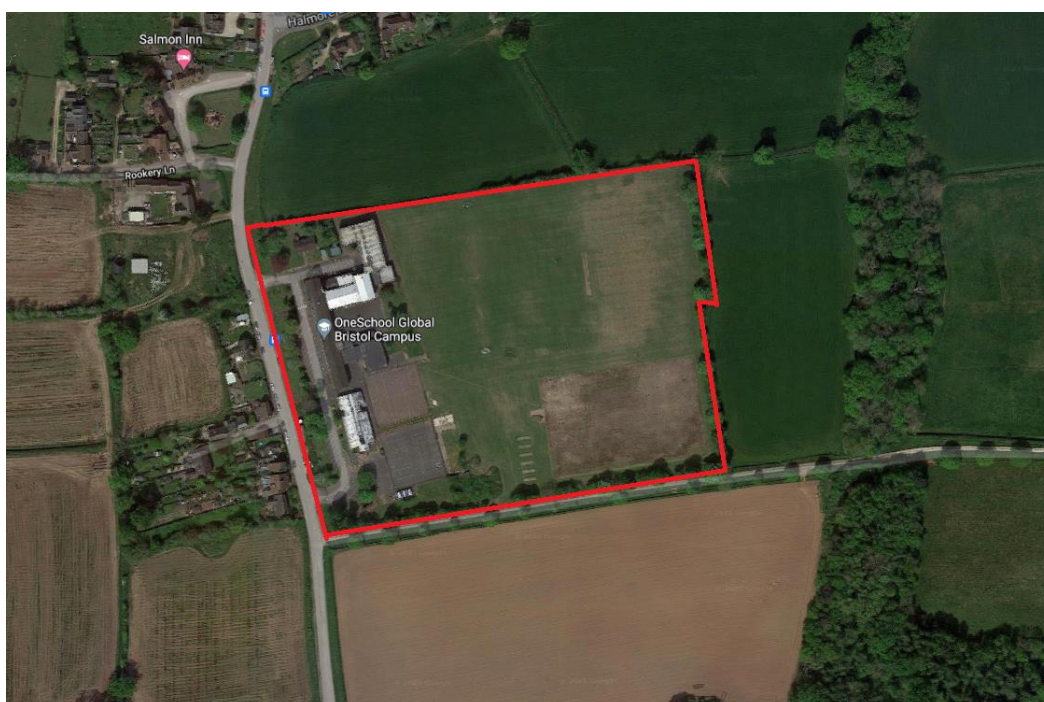


FIGURE 3: SITE LOCATION

4.2 As mentioned above, the Focus School is relocating to Bristol. As such, there is an opportunity to redevelop the site for alternative uses. This has led to a partial allocation within the emerging Local Plan for 70 dwellings. Development is expected to largely follow the footprint of the existing buildings and areas of hardstanding, with the playing fields in the western half of the site.

4.3 The relocation of the school to Bristol is driven by the fact that the majority of the pupils come from the Bristol area. Students currently have to travel long distances to attend the school and they are heavily dependent on the private motor vehicle to do so, given the site's relatively rural location. There are, therefore, significant

¹ Assuming 35-40dph on c. 70% of the site area.

sustainability benefits in facilitating the relocation of the school to Bristol and should be supported by the Local Plan.

- 4.4 However, for reasons set out previously in these representations, there is no need to limit the quantum of development on the site or retain the playing fields for future use as these will be provided elsewhere within the SNS.
- 4.5 There is an opportunity for a more significant development to come forward on the site in the short-term and the site should, therefore, be allocated for a minimum of 140 dwellings, public open space and other supporting infrastructure.
- 4.6 Whitecroft Education Trust are also mindful of the Berkeley Estate's land which is being promoted around the south-eastern edge of Wanswell. An extract from the masterplan which was submitted in support of representations for this adjacent land is provided below.



FIGURE 4: BERKELEY ESTATE CONCEPT PLAN

- 4.7 The trust has not fed into these proposals yet and so are unable to support them in their current form. Furthermore, there cannot be any delay to the redevelopment of the site which is essential to enabling the school's relocation to Bristol.

- 4.8 However, the trust are looking to engage with adjacent landowners to ensure that the development of the school site does not prejudice the delivery of adjacent land parcels when Phase 2 of the SNS start to come forward.