

Gloucester City Plan Examination

Matter 11 – Identifying and Maintaining a Supply of Housing

Participant Statement by Savills on behalf of L&Q Estates

Gloucester is a constrained authority, and there are limited opportunities to deliver larger scale housing within its administrative boundary. This is already established through the adopted JCS which identified sites within Tewkesbury to deliver 4,895 homes to meet Gloucester's needs (Table SP2a, DP001).

The JCS confirmed that there remained insufficient housing land supply at the point of adoption of the JCS for both Tewkesbury and Gloucester – with adopted Policy REV1 requiring an immediate review of housing land supply. In respect to Gloucester, this included the potential for further additional urban extensions within Tewkesbury and Stroud – see #76/77, JCS Inspectors Report (DP003).

Gloucester and Tewkesbury have both confirmed that this shortfall against the adopted JCS targets will not be met in their respective Part II Plans: with a deficit in Gloucester of 836 (EXAM1B) and Tewkesbury of 503 (TBC Hearing Statement to their Borough Plan). We anticipate the shortfall will be higher given the likely slippage of sites in the housing trajectory to post-2031. In the short/medium term, both Authorities have challenges in demonstrating a five year housing land supply.

In accordance with the JCS Inspector's Report (reference above), discussions between Gloucester and Stroud have continued since the adoption of the JCS.

Stroud's new Local Plan (2020-2040) is emerging, and it has reached a more advanced stage than the JCS Review. The Regulation 19 plan was published on the 12th April 2021, and is currently going through the Committee processes in advance of planned formal consultation starting in early May. The intention is then to submit the plan, with adoption anticipated in 2022.

The Regulation 19 Plan proposes the allocation of Land at Whaddon (draft Policy G2). This is essentially as a 'safeguarded' allocation subject to the confirmation in the JCS Review of the need for the site to meet the housing needs of Gloucester.

We attach an extract of the relevant draft policy and explanatory text to this Hearing Statement.

As per paragraph 3.89 of the attachment, the intention is that over the course of the next 18 months (adoption of the Stroud Local Plan is assumed for late-2022), the work on the JCS Review will have progressed to the point at which the unmet housing need of Gloucester and the preferred direction of growth will have been published, so the formal allocation of Land at Whaddon can be confirmed prior to the adoption of the new Stroud Local Plan.

Evidently, the allocation of Land at Whaddon will need to go through the full local plan process, however, for information, we set out the key background details of the site below:

- Land at Whaddon was an Area of Search in the South West Regional Spatial Strategy and supported by the Secretary of State following the independent Examination. The RSS was never however published and was indeed revoked following the change in Government;
- Stroud decided not to join the JCS Authorities in progressing a joint plan, and commenced its own new Local Plan;
- Stroud confirmed that Land at Whaddon was not required to meet its own needs, and the Local Plan was adopted November 2015. The Stroud Local Plan Inspector's Report indicated that there was no evidence at that time of the level of unmet housing need from the JCS area. Adopted Policy CP2 nevertheless states that Stroud would give due consideration to the need to assist other authorities, including through an early review of the Local Plan if required;
- Within the subsequent JCS, the Inspector considered the site as an omission site, and in her Interim Findings (dated 26 May 2016) concluded that the site would *"make an appropriate allocation to help meet the housing requirements of Gloucester and the JCS area"* (paragraph 73);
- The JCS was adopted based upon allocations within its plan area (in Tewkesbury) to meet Gloucester's needs. As per above, there remained a shortfall, and a requirement to commence an immediate review of housing land supply – considering the potential for further strategic locations in Tewkesbury and Stroud to meet Gloucester's needs;
- The JCS Review Issues and Options was published in October 2018, and confirms that land south of Gloucester was being considered with Stroud (paragraph 12.14 DP002).
- Joint evidence documents have been undertaken by the JCS Authorities and Stroud (alongside others) – principally, The Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of Forest of Dean District (2019 and 2020).
- As a result, Stroud have identified Land at Whaddon for allocation.

The JCS Review is due to publish its Preferred Options in Summer 2021, and we understand that this is the point at which Stroud would remove the ‘safeguarded’ element, and seek to formally allocate Land at Whaddon in their emerging Local Plan – assuming that this confirmed the anticipated level of unmet need, and identified Land at Whaddon as one of the preferred sites to meet this.

Our understanding is that the scale of unmet housing need within Gloucester is likely to necessitate more than one new urban extension into neighbouring authorities, and that Land at Whaddon is (based upon the published evidence base to date, site history and the fact that Stroud have already committed to the site in their Regulation 19 consultation) likely to be one of these.

Land at Whaddon is for the most part within Stroud, however, there is an area of approximately 5.4ha which falls within Gloucester. This is white land on the adopted and emerging policies map. It can only be accessed via land within Stroud, and as such, can only come forward as part of a comprehensive scheme.

It therefore would not be appropriate to formally allocate it in the Gloucester City Plan; recognising that the soundness of the proposed strategic allocation will need to be tested through the Stroud Local Plan process.

However, it is likely that if the draft allocation within the Stroud Local Plan is found sound, that there would be a number of years before the JCS Review, and potentially any Gloucester City Plan Review is adopted. Thus there is the potential that a planning application and its subsequent determination will be undertaken during this period.

Whilst it would evidently be necessary for Gloucester City to appropriately assess the planning case for development on an unallocated site at the relevant time, we suggest that a modification to the City Plan would provide an appropriate basis upon which to support the delivery of the development, and provide clarity for the future developer/decision maker.

To provide this clarity we suggest additional text is added to the draft Plan as follows:

Land at Whaddon is identified as an allocation in the emerging Stroud Local Plan for an urban extension to the south of Gloucester. If this allocation is found sound, then a planning application may come forward prior to any review of the development plans for Gloucester City.

Whilst the allocation in the Stroud Local Plan would only pertain to land within its administrative boundary, there is a parcel of approximately 5.4ha of land within Gloucester which sits between the proposed allocation and the railway line (to the immediate south of the Land at Grange Road consented scheme).

This parcel must form part of the comprehensive scheme for the wider allocation site, and should be incorporated into any future Development Brief, as required by Stroud's draft Local Plan, to ensure a comprehensive and coordinated approach to development in this location.

In considering any future development proposals on the site, consideration will be given to the adopted policies of Stroud's Development Plan and associated guidance; recognising that it will be these policies upon which the soundness of the strategic allocation will have been tested. This includes, but is not limited to, public open space standards and housing design and mix requirements.

We recognise that the timing of the publication of the Regulation 19 Stroud Local Plan is unlikely to provide Gloucester City with sufficient time to review and respond fully by the Hearing Statement deadline of the 16th April. To assist in the Examination, we will seek to agree a Statement of Common Ground prior to the relevant Hearing Session.

Savills

15.04.2021



Stroud District Local Plan Review

Pre-submission Draft Plan

(Regulation 19 Consultation) May 2021



The Gloucester fringe | Potential to meet Gloucester's needs

...Land at Whaddon

Site allocation...

Constraints and designations

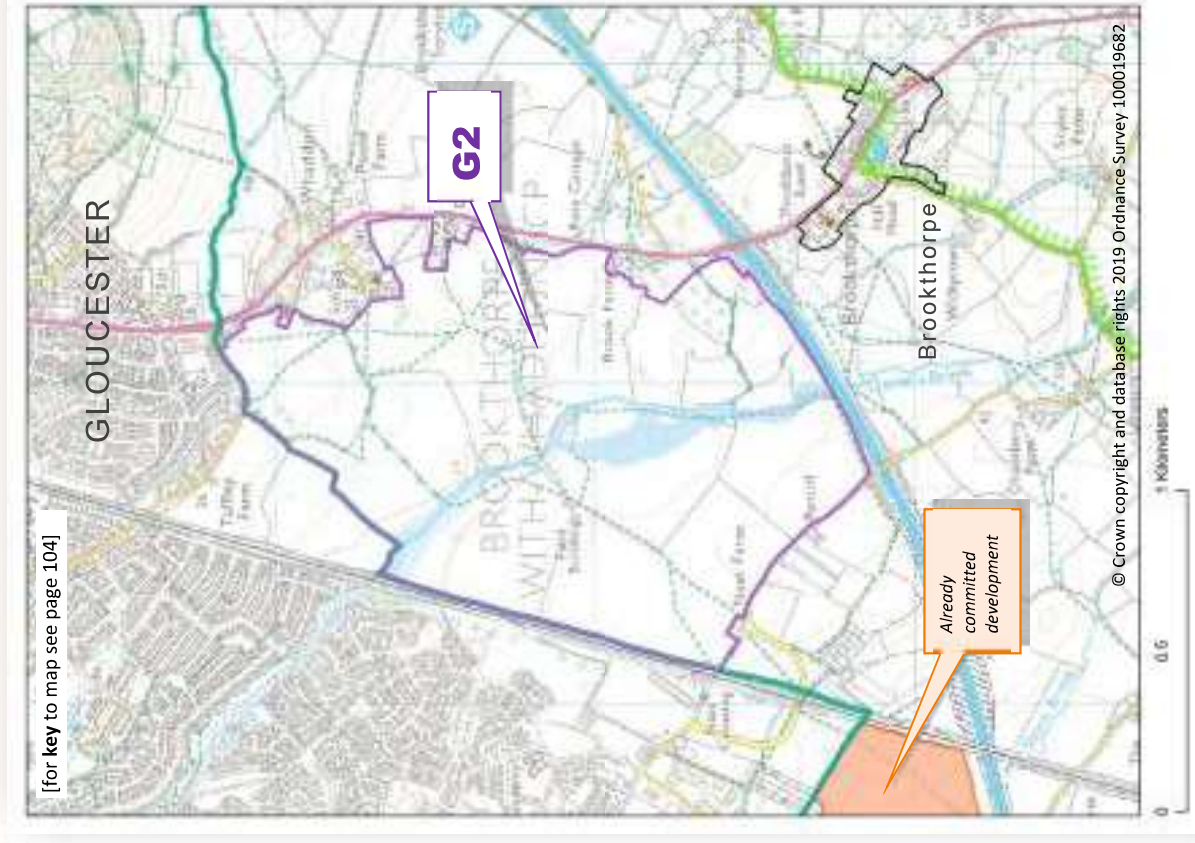
Whaddon is not identified in the Local Plan as a Tier 1-4 settlement and it has no settlement development limits: the Local Plan treats the area as "countryside".

Brookthorpe (a Tier 4b settlement) lies south of the M5 motorway. Gloucester is the nearest higher order settlement and it provides both strategic and local facilities.

The Cotswolds AONB lies beyond the M5, to the south. The area was not included in the Stroud District **Landscape Sensitivity Assessment** (which focussed on land surrounding the District's existing defined settlements), but it has been assessed through the **2019 Assessment of**

Strategic Development Opportunities in Parts of Gloucestershire, which compared the area's landscape sensitivity against that of other locations around Gloucester.

The principal physical constraints affecting the land identified as **G2** are the floodplain (which runs through its centre) and the proximity of the M5 to the south and the Bristol-Birmingham main railway line to the west.



Land at Whaddon

^{3.88} The adopted Gloucester, Cheltenham and Tewkesbury **Joint Core Strategy (2017)** identifies that Gloucester City has a good supply of housing land to meet its requirements to at least 2028/9 but that an early review will be required to explore the potential for additional sites to meet **Gloucester's** needs in the longer term. As a result, the District Council has been working with neighbouring authorities including Gloucester City Council to identify potential sustainable locations to meet longer term housing needs. In 2019, **The Assessment of Strategic Development Opportunities in Parts of Gloucestershire: Interim Report** assessed 29 locations adjacent to Gloucester and identified seven locations as having the highest current degree of accessibility to Gloucester. Of the three locations identified within Stroud District, land at **Whaddon** offers the most potential to help meet the future housing needs of Gloucester.

^{3.89} However, it is important that this initial assessment does not undermine the ability of the City Council to consider reasonable alternatives in the development of the future spatial growth strategy for **Gloucester** as part of the review of the **Joint Core Strategy**. Therefore, at this stage, the District Council supports the safeguarding of this site to help address the future housing needs of Gloucester City, if required. It is expected that by the time this **Draft Stroud Local Plan** has been examined and adopted, the City Council will be able to clearly articulate the nature of unmet needs and the preferred direction of growth so that an allocation at **Whaddon** can be confirmed.

^{3.90} The site is located immediately south of Tuffley (the edge of Gloucester), within the **Gloucester fringe** area of the District. The site is west of and adjacent to the A4173 and next to the small hamlet of **Whaddon**.

^{3.91} The site comprises 73 hectares of primarily agricultural land which is safeguarded for the development of at least 2,500 dwellings, 8 plots for travelling showpeople and community uses, including education and health provision and a local centre including employment, and local retail to meet the needs of the development.

^{3.92} Education requirements will comprise a 3 form entry primary school (incorporating early years' provision) on a 2.8 hectare site plus a 2 form entry primary school (incorporating early years' provision) on a 2 hectare site; and a funding contribution towards 3.5 form entry additional secondary school and further education provision. The cumulative effect of the proposed growth in the **Gloucester fringe** area will require a new secondary school to be provided on a site of up to 8.7 ha in size. The site at **Whaddon** offers the most potential for a site of this size to be incorporated within a strategic development area and may be an all-through school with a primary phase in order to reduce the total amount of land required.

^{3.93} Health provision will involve a site for a new surgery or if not required, a contribution towards the extension of existing health facilities within Gloucester to support the development;

^{3.94} Development is envisaged as a series of neighbourhoods linking seamlessly with the south of Gloucester at Tuffley, with a layout, density, built form and character which reflects this edge of Gloucester location.

The Gloucester fringe | Potential to meet Gloucester's needs

...Land at Whaddon

Particular care will be required to ensure that the layout and design of the development conserves and enhances the setting of the heritage assets adjacent to the site at Whaddon and does not adversely impact on views to and from the AONB escarpment to the south of the M5. To integrate the development with Gloucester, to mitigate noise from the M5 and railway line and to provide a long term strategic landscape buffer to Gloucester, substantial structural landscaping will provide a green buffer on the western, southern and eastern edges of the development and green infrastructure within the development will link where possible with existing green infrastructure to create sustainable green corridors.

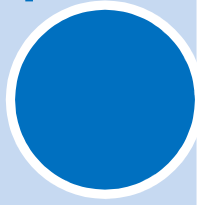
^{3.95} The site is located within the catchments of both the **Severn Estuary SAC/SPA/Ramsar** and **Cotswold Beechwoods SAC** sites. Recent survey evidence suggests residents from this development are likely to seek to access recreation opportunities at these sensitive sites. Therefore, it will be important that the development provides sufficient on-site recreation opportunities and off-site works if appropriate, to mitigate against the potential adverse impacts of visitors seeking to recreate at these sensitive locations.

^{3.96} The Daniels Brook passes through the centre of the site. The disposal of surface water run-off will require careful consideration to ensure that neither the development nor areas downstream are at risk of flooding. Surface water attenuation facilities will be required to serve discrete areas of development. The Council will seek opportunities to reduce the overall level of flood risk in the area, improve flood storage capacity and enhance biodiversity through the layout, use and form of the development. To address existing wastewater issues in the local area,

Severn Trent has a sewer capacity improvement scheme in place for the Gloucester fringe and the scheme will need to take into account the requirements of this site.

^{3.97} The Council has produced a **Sustainable Transport Strategy (STS)** to ensure that new strategic developments deliver on the overall Plan objectives to reduce the environmental impacts of transport and to support a transformative rebalancing of the transport network in favour of sustainable forms of transport. The STS has identified a number of interventions for this site which should be imbedded within the layout and design of the development and delivered at an early stage to ensure that sustainable transport enhancements are prioritised above the provision of additional highway capacity.

^{3.98} In addition to the provision of high quality walking and cycling routes through the development and improvements off-site connecting with key local destinations and public transport permeability through the site, a multi-modal travel interchange hub will be developed at a central accessible location adjacent to the A4173 to allow for interchange for sustainable modes including bus, bicycle, walking and car sharing. Contributions will also be required towards sustainable transport measures on the A4173 sustainable transport corridor and towards extending local bus services. Vehicular access will be primarily from the A4173, with a movement strategy that provides for a modal filter onto Naas Lane, providing access for sustainable transport modes only to Waterwells Business Park and local destinations to the west. Necessary highway improvements will be consistent with the findings of the STS and the **Traffic Forecasting Report**.



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Strategic Site Allocation Policy G2 Land at Whaddon

Land at Whaddon, as identified on the policies map, is safeguarded to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. *Subject to this*, the site will be allocated for a strategic housing development, including residential and community uses. A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.

This will address the following:

1. At least 2,500 dwellings, including 750 affordable dwellings (30%), to address tenure, type and size of dwellings needed within the Gloucester City area;
2. A serviced site to accommodate 8 plots for travelling showpeople to meet the unmet needs arising from the Gloucester City area;
3. A 3FE primary school and a 2FE primary school (both incorporating early years' provision) and contributions towards the provision of a 3.5FE secondary school (+ 6 form) on a 8.7 ha site within the development;
4. A site for a new surgery or contribution towards the extension of existing health facilities to support the development;
5. Accessible natural green space along the Daniels Brook providing a net gain to local biodiversity and public outdoor playing space, including on-site community building and contributions to off-site indoor sports and leisure facilities, in accordance with local standards;
6. On site and, if appropriate, off site work to mitigate against the identified impacts of development upon the Severn Estuary SAC/SPA/Ramsar and Cotswold Beechwoods SAC sites;

7. A local centre, incorporating employment, local retail and community uses to meet the needs of the development;
8. Structural landscaping buffer along the western, southern and eastern boundaries incorporating existing and new native hedgerows and trees and linking with existing green infrastructure;
9. The acceptable management and disposal of surface water, including sustainable drainage systems (SuDS);
10. Adequate and timely infrastructure to tackle wastewater generated by the development, in agreement with the relevant water company;
11. A layout, density and built form and character which reflects the sensitive landscape and heritage context provided by the Cotswolds AONB and local heritage assets including Whaddon Church respectively;
12. A layout which prioritises walking and cycling and access to public transport over the use of the private car by, for example, providing a network of internal walking and cycle routes that are shorter in distance than the highway network, in accordance with Manual for Streets;
13. High quality and accessible walking and cycling routes within the site including the retention and diversion of existing footpaths as necessary, the provision of connections to Waterwells Business Park and local facilities within Tuffley including appropriate infrastructure and crossing facilities and contributions towards the enhancement of off-site walking and cycling routes to key destinations including to Gloucester city centre;
14. Contributions and support to sustainable transport measures on the A4173 sustainable transport corridor;

(contd.) ...





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...Land at Whaddon

Strategic Site Allocation Policy G2 Land at Whaddon

... (contd.)

15. Multi-modal travel interchange hub at a central accessible location adjacent to the A4173 to allow for interchange for sustainable modes including bus, bicycle, walking and car sharing;
16. Public transport permeability through the site, including a link between Naas Lane and Grange Road and bus stops and shelters at appropriate locations within the development to access existing diverted and new bus services and contributions to enhance bus service frequencies to key destinations including Gloucester, Stroud and Stonehouse;
17. A movement strategy that provides for a modal filter onto Naas Lane, providing access for sustainable transport modes only to Waterwells Business Park and local destinations to the west;
18. Electric vehicle charging points in accordance with local parking standards.
19. Behavioural change measures to encourage sustainable travel by way of new and improved infrastructure and implementation of a Travel Plan.
20. Primary vehicular access from the A4173 and additional vehicular access from Grange Road, with necessary improvements to the existing highway network;
21. Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location;
22. Phasing arrangements to ensure that employment, retail and community provision is made in a timely manner.

Key to site allocation map ▼

The site map for Land at Whaddon (outlined in purple) includes the following indicative information:

[Temporary map]



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...Land at Whaddon

