



# Stroud District Local Plan Review

## Additional Housing Options Consultation Report

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1. Introduction	3
2. Public consultation	4
3. Overview of responses	8
4. What you told us	10
Spatial Options	
Question 1	10
Question 2	11
Question 3	12
Question 4	13
Question 5	14
Question 6	14
New housing sites	
Question 7	16
Question 8	21
Potential growth points	
Question 9	21
Question 10	24
Sustainability Appraisal	
Question 11	24

## 5. Appendices

### Appendix 1

#### Site maps for Question 8

\*Maps will be completed for Regulation 19 Consultation



# 1. Introduction

- 1.1 In November 2019, the Council published and carried out consultation on the Stroud District Council Local Plan Review: Draft Plan for Consultation. The Draft Plan sets out the preferred development strategy for meeting the District's growth needs for the period to 2040 based on a minimum housing requirement of 638 homes per annum calculated under the Government Standard Method. A separate report analysing responses to the Draft Plan consultation is available to view on the Council's website at [www.stroud.gov.uk/Stroud District Local Plan review](http://www.stroud.gov.uk/Stroud-District-Local-Plan-review).
- 1.2 In August 2020, the Government published a consultation document proposing changes to the method for calculating the minimum housing requirement for each local authority area in the country. This revised standard method proposed increasing the requirement for Stroud District from 638 homes per annum to 786 homes per annum and a need to plan for a potential additional 1,050 – 2,400 homes between now and 2040.
- 1.3 In response to these changes, in October 2020 the Council carried out a focused consultation on additional housing options for consideration as part of the Local Plan Review should the potential need for additional land within the District for housing be confirmed. This report provides an overview of the public consultation including quantitative analysis and summaries of public comments submitted in response to the Additional Housing Options consultation paper October 2020. A Council response to issues raised details how comments have been taken into account in the Pre-submission Plan.



## 2. Additional housing options consultation

### Consultation document

- 2.1 The document sets out the spatial and additional site options available if it is necessary to identify additional housing land and seeks views on where additional housing land should be found and whether and where a reserve housing supply should be identified in the event that we need it in the future.

### COVID-19 impact

- 2.2 Temporary changes to the Council's Statement of Community Involvement (SCI) were adopted on the 28 March 2019 in the light of the COVID-19 pandemic and included amended consultation arrangements.
- 2.3 The consultation was primarily carried out online with particular steps taken to enhance local publicity, ensure access to the consultation for those without internet access and provide further explanation of the specific nature of the consultation as part of the Local Plan Review.
- 2.4 The paper was published on the Council's website, [www.stroud.gov.uk/Stroud District Local Plan review](http://www.stroud.gov.uk/Stroud%20District%20Local%20Plan%20review) along with links to a range of background information and relevant online resources.
- 2.5 Public consultation on the additional housing options took place over a period of eight weeks from 21st October until 16th December 2020.

### Making representations

- 2.6 Feedback on the Additional Housing Options consultation paper was invited across a range of formats:
- By online questionnaire
  - By email
  - By letter
  - An online call for sites: site submission form

### Publicity and notification



- 2.7 The eight-week consultation was advertised in the local press in October 2020 and was also the subject of additional media coverage online and in print. Social media publicity of the Additional Housing Options press release achieved a reach of 7,350 on Facebook. The consultation was publicised in the Council's eNews November 2020 to promote wider awareness of the consultation across the Council.
- 2.8 Notification of the consultation, including a PDF leaflet advertising the consultation and invitation to request printed leaflets to display, was emailed to all town and parish councils and public deposit points to provide local publicity of the consultation. The leaflet included publicity of a dedicated telephone hotline number to request a hard copy of the consultation document in the post for anyone interested in responding but genuinely unable to access the consultation online. Additional printed fliers were provided to Moreton Valence Parish Council and Whitminster Parish Council to be delivered around local communities closest to proposed growth points PGP 1 Land at Grove End Farm, Whitminster and PGP 2 Broad location at Moreton Valence/ Hardwicke publicising the consultation arrangements.
- 2.9 Local members received an email notifying them of the consultation and hotline arrangements for constituents unable to access the consultation document online.
- 2.10 Email notification was also sent to all statutory consultees, together with interest groups, local organisations, businesses, land agents, developers and local residents signed up to the Planning Strategy consultation database, to be kept informed of the Local Plan process.

## Public engagement

- 2.11 In line with the Council's revised Statement of Community Involvement (SCI) and COVID-19 restrictions, consultation methods were adapted to promote the consultation, engage with interested parties and reach out to residents without online access to the consultation document.
- 2.12 In addition to the telephone hotline number to request a hard copy of the consultation document in the post, the following measures were included to support understanding and promote awareness of the additional housing options focused consultation:

## Audio visual presentation

- 2.13 A short 3-part PowerPoint presentation was available online, providing an audio visual explanation of the consultation document, spatial options and potential sites and how to respond to the consultation.

## Neighbourhood wardens



- 2.14 The Council's Neighbourhood Wardens across the District were engaged to promote the public consultation in local communities; including displaying leaflets, having a hard copy of the consultation document available for residents and passing on document requests using the hotline number to help support residents without online access.

## Social media

- 2.15 A continued social media presence, to promote public engagement throughout the eight-week consultation period, included:
- A Facebook post highlighting the last few days to comment on the Additional Housing Options consultation and where we should plan new homes in the District achieved a reach of 2,200.
  - Twitter, published #Stroud2040 content throughout the consultation period, achieved 12,330 impressions and a top tweet of 3,390 impressions highlighting the last few days of the consultation period.

## Town and Parish Councils

- 2.16 Town and Parish Councils with a site listed in the consultation document located within their parish were invited to arrange a virtual meeting with officers to discuss proposals. Meetings were held with the following parish councils:

Hardwicke Parish Council  
Moreton Valence Parish Council  
Whitminster Parish Council

- 2.17 All Town and parish Councils were invited to an online workshop, held via Zoom, on 7th December 2020 including officer presentations on the Local Plan spatial strategy options, the potential additional housing options and an introduction to possibly using reserve housing sites in the Local Plan. Breakout groups, facilitated by Planning Strategy officers, took part in structured discussions on the advantages and disadvantages of the different spatial strategy options for accommodating additional housing followed by consideration of the merits, disadvantages and potential triggers for including reserve housing sites.

- 2.18 A list of the 23 Town and Parish Councils represented is provided in the table below:

### Town/Parish Council

Bisley with Lypiatt Parish Council  
Cainscross Parish Council  
Dursley Town Council  
Eastington Parish Council  
Frampton Parish Council

Minchinhampton Parish Council  
Moreton Valence Parish Council  
North Nibley Parish Council  
Nympsfield Parish Council  
Pitchcombe Parish Council



Hamfallow Parish Council  
Hardwicke Parish Council  
Haresfield Parish Council  
Hinton Parish Council  
Horsley Parish Council  
Kingswood Parish Council  
Leonard Stanley Parish Council

Rodborough Parish Council  
Slimbridge Parish Council  
Standish Parish Council  
Stonehouse Town Council  
Whitminster Parish Council  
Wotton-under-Edge Town Council

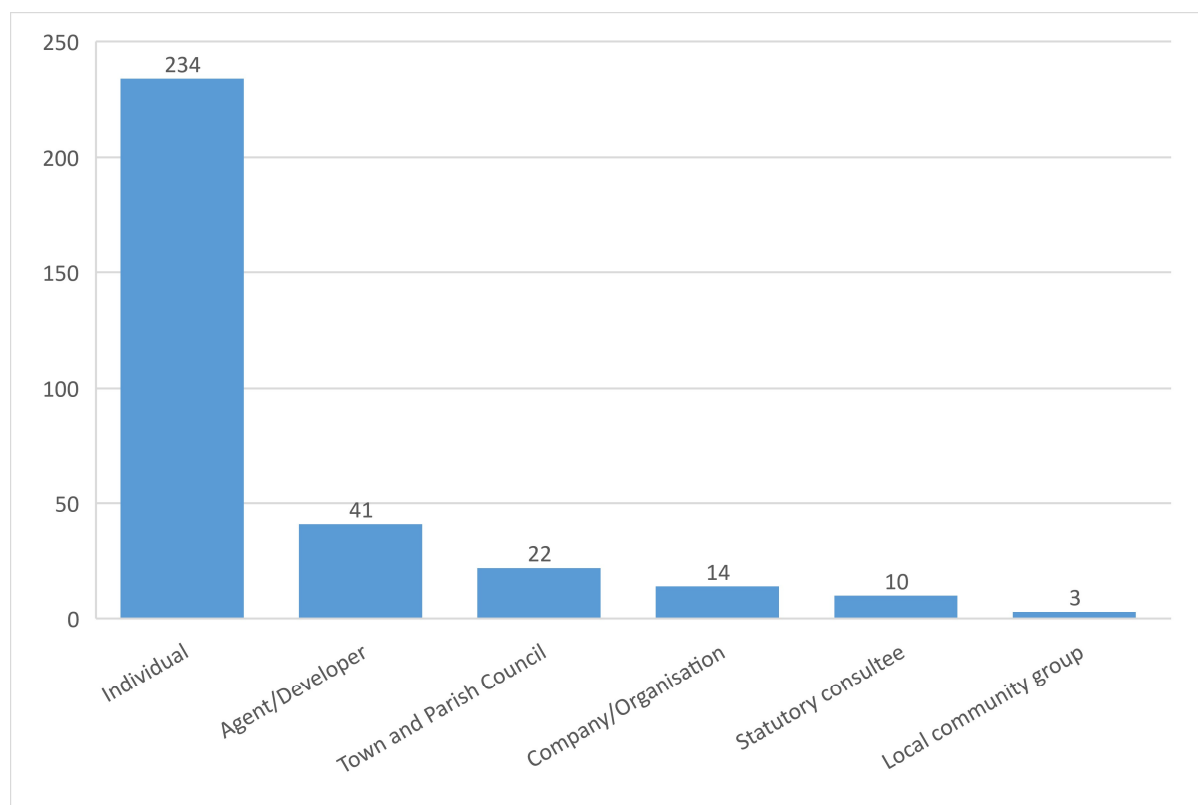




# 3. Overview of the responses

## Level of Response

- 3.1 In total, 356 respondents submitted their comments on the Additional Housing Options consultation. Responses were received from a variety of stakeholders including individuals, town and parish councils, statutory and non-statutory organisations, landowners and developers and local community groups. The majority (72%) of responses submitted were made by individuals. The full breakdown is shown below in Figure 1.



**Figure 1: Type of response**

- 3.2 Representations were received from 10 statutory consultees:

Canal and River Trust  
Environment Agency  
Gloucestershire County Council  
Highways England  
Historic England

Natural England  
Severn Trent Water  
South Gloucestershire Council  
Sports England  
Wessex Water

- 3.3 Representations were received from 22 town and parish councils:



Cam Parish Council  
 Chalford Parish Council  
 Dursley Town Council  
 Eastington Parish Council  
 Frampton Parish Council  
 Hamfallow Parish Council  
 Hardwicke Parish Council  
 Horsley Parish Council  
 Kingswood Parish Council  
 Leonard Stanley Parish Council  
 Minchinhampton Parish Council

Nailsworth Town Council  
 Rodborough Parish Council  
 Slimbridge Parish Council  
 Standish Parish Council  
 Stonehouse Town Council  
 Stroud Town Council  
 Uley Parish Council  
 Upton St Leonards Parish Council  
 Uley Parish Council  
 Upton St Leonards Parish Council  
 Wotton under Edge Town Council

- 3.4 Representations were received from 324 agents, developers, companies, organisations, local community groups and individuals.

## Method of response

- 3.5 In order to respond to the consultation, the Council asked that all responders complete an easy to use electronic form which could be submitted online, but could also be printed, completed manually and returned. A full breakdown of responses by method can be seen in Table 2 below:

Method	No. of responses	Percent
Online form	237	67%
Email	113	31%
Letter	6	2%
<b>Total</b>	<b>356</b>	<b>100%</b>

**Figure 2: Method of response**



## 4. What you told us....

- 4.1 The response form was split into eleven questions grouped by themes matching the consultation document. For each of the closed questions asked, the data is presented in a table showing how many people responded with either support, object, yes or no. The answer with the most responses has been highlighted and the percentage of people who gave each answer has also been included. Where open questions were asked, a summary of the responses has been included. It should be noted that because some responders chose not to answer every question and some responders chose not to use the Councils response form, the amount of answers to each question will not add up to the total number of individual responders.

### Question 1

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

Option A – Intensify	Support		Object	
	Number	%	Number	%
	<b>137</b>	<b>60</b>	89	40

Option B - Towns and villages	Support		Object	
	Number	%	Number	%
	77	33	<b>155</b>	<b>67</b>

Option C - Additional growth point	Support		Object	
	Number	%	Number	%
	<b>109</b>	<b>51</b>	104	49

Option D - Wider dispersal	Support		Object	
	Number	%	Number	%
	82	41	<b>116</b>	<b>59</b>

Option E - Would you support a hybrid	Support		Object	
	Number	%	Number	%
	<b>158</b>	<b>72</b>	61	28



**Option F - Can you suggest another strategy?**

Summary of Option F responses

No new viable strategies were submitted to this question, the majority of responses were a mixture of repeating one of the above existing strategies, objection to one of the existing strategies or objecting to any new development in the district or the responder's local area.

**Council's response**

In August 2020, the Government published a consultation document which proposed changes to the way the Government calculates the minimum housing requirement for each local authority area in the country. This revised standard method proposed increasing the requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 homes per annum, to 786 homes per annum. If adopted, this new revised method would have required the Draft Local Plan to identify additional land within the District for housing. Question 1 was to consult on which strategic option responders supported if the Council was required to find additional land.

On 16 December 2020 the Government published its response to the consultation and the proposed changes to the guidance. In summary, the Government withdrew its proposals to increase the requirements for Stroud District and kept the current standard method. Which for Stroud District means reverting to the 630 homes per annum that we have been planning for through the Local Plan Review. As sufficient land has been identified to meet the minimum housing requirements the Council isn't required to provide additional land and a strategic approach isn't required. In the event of any further changes the Council has tested the different strategic options for additional land through this consultation.

## 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?**

Summary of Question 2 responses

- A hybrid of A&C was the most named approach, with responders supporting intensification of existing main settlements as the most sustainable due to existing infrastructure, services and facilities. Responders thought that intensification first, coupled with new growth points as necessary would take pressure away from smaller towns and protect the rural character of smaller settlements and protect the local environment.
- Although not named outright A&B seemed popular, with many responders describing a hybrid approach of intensification across urban extensions and towns and villages as the best approach.
- Support for A&D was based on responders feeling that while the majority of development should be based on intensification as set out in A, some development was



required in all areas to provide housing for local people, help support existing services and give all areas a chance to grow if they wanted.

- Support for B&D was based on responders wanting to see growth in towns and villages and smaller settlements.
- Support for C&D was based on responders wanting to see a new growth point to take pressure away from existing towns and villages, but still allow some dispersal in smaller settlements.
- There was limited support for a combination of all options A-D combined, as this would allow intensification, growth in towns and villages, some new growth points and some development in smaller villages. It was felt this mix stood the most chance of success as it included all the available options.
- A number of responders didn't name any hybrid approach but stated they would support any combination that avoided development on greenfield sites, while some said they would support any hybrid that focused on improving cycling and environmental issues.
- A number of responders said they objected to any hybrid approach, reasoning that no housing should be allocated at all.

#### Council's response

On 16 December 2020 the Government withdrew the proposals to increase the local housing need to 786 homes per annum and reverted to the 630 homes per annum that we have been planning for through the Local Plan Review. Therefore, the Council does not need to identify additional land at this time as sufficient land has been identified to meet the minimum housing requirements. However, in the event of any further changes which do require a reserve site the Council has consulted and tested the different strategic options.

## 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?	Yes		No, immediate review of the Local Plan		No, other option	
	Number	%	Number	%	Number	%
	88	37	127	54	21	9

#### Council's response

On 16 December 2020 the Government withdrew the proposals to increase the local housing need to 786 homes per annum and reverted to the 630 homes per annum that we have been planning for through the Local Plan Review. Therefore, the Council does not need to identify a reserve site at this time as sufficient land has been identified to meet the minimum housing



requirements. However, in the event of any further changes the Council has consulted on reserved sites.

## Question 4

**Which strategy option(s) would you support, if a reserve site (or sites) is required? Note: Option A – Intensify cannot be used as a means of identifying an additional reserve site.**

Option B – Towns and villages	Support		Object	
	Number	%	Number	%
	63	33	126	67

Option C – Additional growth point	Support		Object	
	Number	%	Number	%
	81	45	98	55

Option D – Wider dispersal	Support		Object	
	Number	%	Number	%
	64	45	114	55

Option E – Would you support a hybrid	Support		Object	
	Number	%	Number	%
	145	70	61	30

**Option F – Can you suggest another strategy?**

Summary of Option F responses:

Very few suggestions were made for a new strategy, with the majority of responders repeating that brownfield sites and intensification should be looked at again, other responses included:

- The Council should challenge the Government's housing numbers.
- If intensification is done properly no reserves site is required.
- There are too many retail sites and existing retail should be kept as the reserve.
- The AONB protection should be reduced and used to locate reserve sites.
- The reserve dwellings required should be split equally and the Parish and Town Councils should have to nominate a site each.

### Council's response

On 16 December 2020 the Government withdrew the proposals to increase the local housing need to 786 homes per annum and reverted to the 630 homes per annum that we have been planning for through the Local Plan Review. Therefore, the Council does not need to identify a



reserve site at this time as sufficient land has been identified to meet the minimum housing requirements. However, in the event of any further changes the Council has consulted on the strategic options for reserved sites.

## Question 5

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

Very few responders answered this question, from those that did, most repeated that option A, intensification and brownfield sites were the most suitable option with the other responses including:

- B, C and D wider dispersal, in that a smaller number of houses being built in many small tier 2, 3 and 4 settlements is going to add up to number that will fulfil housing supply.
- A hybrid of Options B and D would be supported as this allows for most efficient use of a dispersed housing strategy bringing a wealth of benefits to smaller settlements for development.
- A combination of options B, C and D are likely to provide the best outcomes for wildlife and people's access to nature.
- No support for a hybrid.

### Council's response

On 16 December 2020 the Government withdrew the proposals to increase the local housing need to 786 homes per annum and reverted to the 630 homes per annum that we have been planning for through the Local Plan Review. Therefore, the Council does not need to identify a reserve site at this time as sufficient land has been identified to meet the minimum housing requirements. However, in the event of any further changes the Council has consulted on the strategic options for reserved sites.

## Question 6

If a site in the Local Plan does not come forward for development as expected, then a reserve site(s) may be required. What should trigger a reserve site (or sites) coming forward?

A) A delay in an allocated Local Plan site receiving planning permission?	Support		Object	
	Number	%	Number	%
	37	26	108	74

B) Failure to deliver housing at the build rates set out in the Local	Support		Object	
	Number	%	Number	%
	70	29	168	71



C) Another trigger (please specify)	Support		Object	
	Number	%	Number	%
	57	24	181	76

Summary of C) responses:

- A trigger should only be used if one of the sites can't be used for safety reasons.
- Delays can be caught up; delays should not be a trigger.
- Reserve sites should only be triggered if every other site has been built out.
- The Council should allocate sites properly to remove the need for reserve sites.
- The Council should challenge the housing numbers.
- The Council should over allocate now to avoid a reserve or planning by appeal.
- Concerns over the economy/COVID19/Brexit, this is the wrong time to look at housing delivery.
- Only if and when a reserve is needed, there should be a public consultation and options put to the public.
- Planning is too onerous, the system should be changed.
- If a site allocated for employment (retail/office/manufacturing/warehousing) remains unused within 5 years, its designation should be automatically changed to housing.
- Release of reserve sites for development should only be allowed once two thirds of all scheduled construction on 90% of land with existing planning permission is completed to time.
- If a site can't come forward, then a replacement reserve site should only be considered in that geographical area and after a public consultation.
- The trigger should only be the loss of the 5-year supply.
- The trigger should only be considered if the Council has caused delays.
- No reserve sites should be included/if the council has any doubts over its plan it shouldn't proceed.
- This question is too complicated/confusing/needs qualifications to answer/should not be up to the public.

### Council's response

On 16 December 2020 the Government withdrew the proposals to increase the local housing need to 786 homes per annum and reverted to the 630 homes per annum that we have been planning for through the Local Plan Review. Therefore, the Council does not need to identify a reserve site trigger at this time as sufficient land has been identified to meet the minimum housing requirements. However, in the event of any further changes the Council has consulted on reserved site triggers.





## Question 7

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

7a BER016 Hook Street Farm, Berkeley	Support		Object	
	Number	%	Number	%
	86	55	71	45

### Support Comments

- Site is sustainable, appropriate size and scale.
- This area needs additional housing.
- This area has good infrastructure and transport links.
- Development here will have little landscape and environmental impact, most of the identified 'potential sites' are several kilometres away from the boundary of the Cotswolds National Landscape and/or from elevated viewpoints within the National Landscape.
- Dispersal approach is supported.
- Development will bring support to existing services and shops.
- This area is more appropriate than others.

### Object Comments

- The area doesn't need any more housing/is already overdeveloped.
- Out of character, this area is rural/impact on existing character.
- This will have a negative impact on Sarah's Field which has proved to be an enormous asset to the town.
- No development on greenfield, impact on environment, flora & fauna, and landscape.
- The site is too large out of scale for the area.
- The development proposed is too intense.
- The access is not suitable and has been the reason for refusing development on this site previously/roads can't cope with additional traffic, junctions 12 and 13 of the M5 already at capacity as well as the A38 and A419.
- This area suffers from flooding which will be made worse here and downstream.
- This area is not sustainable and is too far from infrastructure and services.

### Council's response

After assessment BER016 & 17 are allocated for development comprising up to 60 dwellings and open space. Particular issues to address include the provision of structural landscaping to integrate the development into the landscape and not increasing flood risk either on or off site. A 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-ordinate manner.



7b BER017 Bevans Hill Farm, Berkeley	Support		Object	
	Number	%	Number	%
	97	62	59	38

## Support Comments

- Site is sustainable, appropriate size and scale.
- This site should be in the Berkeley NDP.
- This area needs additional housing.
- This area has good infrastructure and transport links and would strengthen the need for the completion of the Berkeley by pass from Berkeley to the A38.
- Development here will have little landscape and environmental impact, most of the identified 'potential sites' are several kilometres away from the boundary of the Cotswolds National Landscape and/or from elevated viewpoints within the National Landscape.
- Dispersal approach is supported.
- Development will bring support to existing services and shops.
- This area is more appropriate than others.
- Proposals relate well to existing development limits.

## Object Comments

- The area doesn't need any more housing/is already overdeveloped/Great Oldbury and Forest Green football club too much already.
- Will have the effect of nearly joining a ring of development around Berkeley, effectively joining up with the Sharpness development.
- Out of character, this area is rural/impact on existing character.
- No development on greenfield, impact on environment, flora & fauna, and landscape.
- The site is too large out of scale for the area.
- The development proposed is too intense.
- This area suffers from flooding which will be made worse here and downstream.
- This area is not sustainable and is too far from infrastructure and services.
- Roads already too congested with traffic from the newly opened college and Police training centre, Junctions 12 and 13 of the M5 already at capacity.
- Planning has been applied for a number of times on this site for a development of light industrial units and residential units; rejected at least once due to concern for access.
- No employment opportunities here.
- Intensification of existing allocations should be pursued instead.



### Council's response

After assessment BER016 & 17 are allocated for development comprising up to 60 dwellings and open space. Particular issues to address include the provision of structural landscaping to integrate the development into the landscape and not increasing flood risk either on or off site. A 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-ordinate manner.

7c HAR017 Land at Sellars Road, Hardwicke	Support		Object	
	Number	%	Number	%
	119	79	31	21

### Support Comments

- Site is sustainable, appropriate size and scale, will keep a sense of community.
- Due to surrounding developments the site has become isolated and surplus to requirements and suitable for development.
- This area needs additional housing and these small sites will make an important contribution in line with the NPPF.
- Site should be developed in line with Hardwicke NDP.
- This area has good infrastructure and transport links including a good bus service.
- Dispersal approach is supported.
- Development will bring support to existing services and shops.

### Object Comments

- The area doesn't need any more housing/it should be located in the main towns.
- Out of character, this area is rural/impact on existing character.
- Growth should only be at new growth points/settlements.
- This area suffers from flooding which will be made worse here and downstream.
- This area is not sustainable and doesn't have enough infrastructure and services.
- Roads already too congested A38, Junctions 12 and 13 of the M5 at capacity, poor local public transport.
- Intensification of existing allocations should be pursued instead.

### Council's response

After assessment HAR017 Land at Sellars Road will be allocated for up to 10 dwellings and open space uses. Particular issues to address include integration with surrounding land uses, open space provision, addressing the need for precautionary archaeological evaluation, surface water management



and a road access being formed off Bridge Keepers Way. A 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.

7d STR065 Beeches Green Health Centre	Support		Object	
	Number	%	Number	%
	113	85	20	15

## Support Comments

- Site is sustainable, appropriate size and scale.
- This site is a brownfield/within development limits/infilling.
- This area needs additional housing.
- Very good access to public transport/rail/bus and close to major road links to Cheltenham and Gloucester.
- Will encourage walking and cycling use by residents.
- This area has good infrastructure and access to service due to central location.
- Development isn't on greenfield/agricultural, will have no landscape or environmental impact and no harm to the AONB or the countryside.
- Development will bring support to existing services and shops.
- This area is more appropriate than others.

## Object Comments

- Too large in scale.
- What will happen to the health centre?
- Intensification is not supported.
- Current infrastructure can't cope.
- Poor highway access/congestion/roads already at capacity.

### Council's response

After assessment STR065 Land at Beeches Green will be allocated for approximately 20 dwellings, healthcare and extra care accommodation. Particular issues to address include integration with surrounding land uses, including enhancing the setting of adjacent listed buildings and improving sustainable access through the site from the town centre towards Stratford Park. A 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-ordinate manner.



7e WHI012 South of Hyde Lane, Whitminster	Support		Object	
	Number	%	Number	%
	112	65	61	35

## Support Comments

- Site is sustainable, appropriate size and scale and within the A38/ M5 corridor.
- Close to employment facilities.
- This area needs additional housing.
- Will provide a good mixture of house types.
- In line with NPPF, local planning authorities to recognise the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, as can often be built relatively quickly.
- This area has good infrastructure that can support this level of development.
- Development here will have little landscape and environmental impact, no loss of agricultural land/greenfield.
- Site is only 200m from the National Landscape boundary, however it will have no negative impact.
- Dispersal approach is supported.
- Development will bring support to existing services and shops and will complement the existing community.
- This area is more appropriate than others.
- Proposals relate well to existing development limits.

## Object Comments

- Outside of development limits and constitutes urban sprawl.
- Other sites which have been promoted in Whitminster are better located in terms of access and relationship to the village –i.e. land east of School Lane and extending the proposed allocation West of School Lane.
- Out of character/size for this area, impact on the existing rural character/identity.
- No development on greenfield, impact on environment, flora & fauna, and landscape.
- This area suffers from flooding which will be made worse here and downstream.
- Infrastructure already struggling, the school is at capacity.
- Site access is poor with a single lane prone to flooding, the A38 end of Hyde lane is already congested.
- Site will increase sewage problems here and further down the system.
- Roads already too congested, Junctions 12 and 13 of the M5 already at capacity.
- Intensification of existing allocations should be pursued instead.



### Council's response

After assessment WHI012 will not be allocated as Hyde Lane is considered inadequate to serve as a main access to development due to its narrow width and its role within the wider Public Rights of Way network. It is considered that local housing needs can be better provided for at PS45 Land west of Upton's Gardens and PS46 Land west of School Lane, in accordance with the development strategy for Whitminster as an accessible settlement with local facilities.

## Question 8

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

A total of 26 new sites were suggested, these sites will be mapped and added as Appendix 1 for the Regulation 19 Consultation.

### Council's response

On 16 December 2020 the Government withdrew the proposals to increase the local housing need to 786 homes per annum and reverted back to the 630 homes per annum that we have been planning for through the Local Plan Review. Therefore, the Council does not need to identify new sites at this time as sufficient land has been identified to meet the minimum housing requirements.

Any new sites submitted, but not previously assessed as part of the Strategic Assessment of Land Availability (SALA) 2017 – 2020 will be assessed as part of the 2021 update later in the year and would be available for consideration as potential suitable and available site options as part of the Local Plan Review process if additional sites are required.

## Question 9

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

a) PGP1 Land at Grove End Farm,	Support		Object	
	Number	%	Number	%
	109	64	61	36

### Support Comments

- Site is sustainable, appropriate size, will utilise materplanning and is within the A38/ M5 corridor.
- The area needs more housing this is a logical location.
- Close to employment facilities/opportunities.
- Will bring much needed funding and improvements to infrastructure.



- Development will bring support to existing services and shops and complement the existing community.
- This area is more appropriate than others and won't impact the existing towns and villages.
- Good transport links to major roads and junctions which reflects the building of the "new" A419 road linking the A38 and the M5 junction 13.
- Available land options are few, so any major development has to be sandwiched between the AONB and the Severn Flood plain, meaning the M5 corridor is the best and only option.
- Opportunity to design an exemplar carbon-negative scheme.
- This land has long been earmarked for development and is expected to be allocated.
- Better than overwhelming smaller settlements.
- This site is really an extension of Stonehouse and Stroud which have existing good facilities and is close to motorway.
- Sufficiently far from either the Severn Estuary (and flood plain) and Cotswold Escarpment, so as to mitigate ecology or environmental concerns.
- Site will result in less coalescence, less archaeological damage; less noise pollution.
- Approach is fair as it doesn't concentrate all housing in existing towns.
- The land is not high grade agricultural land.

## Object Comments

- Site is too large/out of scale/dominates surrounding villages, impact on the existing rural character/identity.
- Too close motorway and A38 for noise and pollution.
- No development on greenfield, impact on environment, flora & fauna, and landscape, Loss of agricultural land.
- This area suffers from flooding and is waterlogged most of the year.
- The appropriate infrastructure won't be delivered.
- Roads already too congested, Junctions 12 and 13 of the M5 already at capacity.
- Intensification of existing allocations should be pursued instead.
- No public transport/lack of rail/reliant on car/pollution.
- New settlement will have no community feel or identity, engineered communities rarely work.
- Development does not fit with being carbon zero or neutral.

### Council's response

Having considered the results of public consultation, assessment work and local evidence, the Council has decided not to take this growth point forward into the Pre-submission Draft Local Plan. The site performs less well than alternative sites in terms of meeting sustainability appraisal objectives and compatibility with the proposed development strategy.



b) PGP2 Broad location at Moreton Valence / Hardwicke, Including SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009.	Support		Object	
	Number	%	Number	%
	114	63	67	37

## Support Comments

- Site is sustainable, appropriate size, and is within the A38/ M5 corridor.
- Much better than the Whitminster option.
- This area has taken less development than the east of the district, this is finally fair.
- The area needs more housing this is a logical location.
- Close to employment facilities, excellent transport links to Bristol and Gloucester
- Will bring much needed funding and improvements to infrastructure, schools, doctors, roads, rail and busses.
- Development will bring support to existing services and shops and complement the existing community.
- This area is more appropriate than others and wont impact the existing towns and villages.
- Opportunity to design an exemplar carbon-negative scheme/potential to link to incinerator, design a cycling and walking settlement, this fits with carbon zero targets.
- Better than overwhelming smaller settlements/unfair dispersal.
- Sufficiently far from either the Severn Estuary (and flood plain) and Cotswold Escarpment, so as to mitigate ecology or environmental concerns.
- Site will result in less coalescence, less archaeological damage, less noise pollution as it doesn't add all housing to existing towns.
- The land is not high grade agricultural land.
- Housing closer to the Gloucester Fringe better meets the housing needs that Stroud and Gloucester have agreed to share.
- The current countryside can't be used by the public, so the addition of allocated open space will be of benefit everyone, rather than providing a view to the current limited number.
- This would be an ideal reserve site.

## Object Comments

- Wrong strategy, intensification and dispersal instead.





- Site is too large/out of scale/dominate surrounding villages, impact on the existing rural character/identity/destroy heritage.
- The AONB protection should be removed, it is resulting in unfair development in other parts of the district.
- Too close to motorway and A38 for noise and pollution and too close to incinerator.
- No development on greenfield, impact on environment, flora & fauna, and landscape, Loss of agricultural land.
- This area suffers from flooding and is waterlogged most of the year.
- Roads already too congested, Junctions 12 and 13 of the M5 and the Cross Keys Roundabout are all at capacity.
- Intensification of existing allocations should be pursued instead.
- No public transport/lack of rail/reliant on car/pollution.
- New settlement will have no community feel or identity, engineered communities rarely work.

#### **Council's response**

Having considered the results of public consultation, assessment work and local evidence, the Council has decided not to take this growth point forward into the Pre-submission Draft Local Plan. The site performs less well than alternatives sites in terms of meeting sustainability appraisal objectives and compatibility with the proposed development strategy.

## Question 10

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

There were no new sites submitted to be considered as potential future growth points.

#### **Council's response**

On 16 December 2020 the Government withdrew the proposals to increase the local housing need to 786 homes per annum and reverted back to the 630 homes per annum that we have been planning for through the Local Plan Review. Therefore, the Council does not need to identify new sites at this time as sufficient land has been identified to meet the minimum housing requirements.

## Question 11

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

Very few comments were made in response to this question and many responses were not relevant to the SA and either repeated answers already given to other questions or gave responses not relevant to this consultation. Those that did respond specifically to the SA included:



- A number of precise technical questions on individual assessments were submitted by site promoters.
- The document is too complicated/hard to understand/too long.
- Well prepared thorough document.
- The SA should be updated once all of the AGPs have been fully reviewed, to identify relative merits for each AGP. A quick comparison of the sites, knowing the sites in question, highlights significant differences in sustainability which are recognised in the SA report. Both new AGPs (PGP1 and PGP2) are significantly more sustainable than PS37 due to their location and the proposed developments eg developers intend to move the high pressure gas pipeline for both.
- A full assessment of all sites should be publicly available to compare the sites proposed for the Local Plan prior to submission to the Inspectorate

#### **Council's response**

All comments made to the SA have been forwarded to LUC the Councils consultants who have analysed all comments and will respond in the latest version of the SA.

