

Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
Gloucestershire
GL5 4UB

X March 2024

Dear Sir / Madam.

Re: Gloucester City Council response to planning application S.23/2428/OUT - Land at Whaddon, Gloucester.

Proposal: Outline application for up to 2,550 new dwellings (Class C3) with supporting infrastructure including, a local centre (Class E), community core (Class E and Class F.2), 150 space transport modal interchange, primary and secondary school education provision (Class F.1), open space, areas of Green Infrastructure), watercourse enhancement measures to the Daniels Brook, drainage infrastructure, parking and supporting infrastructure and utilities, and creation of 3 no. New access points from the A4173 and 1 no. New access points from Naas Lane. All matters reserved apart from access.

Thank you for consulting Gloucester City Council on the above planning application. The City Council objects to this planning application, principally due to its impacts on highway network in the immediate area and the wider area including J12 of the M5.

The site in question is part of land identified as 'safeguarded' in the emerging Stroud District Local Plan Review (SDLPR), to meet the future housing needs of Gloucester City, should it be required and provided it is consistent with the approved strategy of the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (JCS) Review.

The JCS authorities have engaged with Stroud District Council (SDC) on an ongoing basis through the 'Duty to Cooperate' and responded to key stages in the preparation of the emerging SDLPR, providing views on the proposal. The last of these was sent in July 2021 in response to the Pre-Submission consultation, under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The final two paragraphs of this response set out the JCS authorities' position, reproduced below:

32. Overall, the JCS authorities broadly support the Stroud District Local Plan Review, particularly the safeguarding of land to provide for the unmet development needs of

Gloucester City. At the time of writing, the JCS Review is progressing and will consider development needs, a spatial strategy and site opportunities. As the review progresses, it will be necessary for the JCS authorities and Stroud District Council to continue to engage in relation to the safeguarded site 'Land at Whaddon', and to consider other reasonable opportunities to address unmet development needs such as residential and employment land, including those on the fringe of Gloucester, should they be required and in accordance with the JCS Review.

33. The JCS authorities look forward to continuing to work with Stroud District Council positively and constructively on strategic planning matters.

Subsequently, in February 2023, the JCS councils signed a Statement of Common Ground with Stroud District Council, which reiterated the above and reconfirmed the commitment to work together in addressing strategic housing matters.

Since then, in July 2023, Cheltenham, Gloucester and Tewkesbury councils agreed to produce one plan for the three authorities, called the Strategic and Local Plan (SLP). At the time of writing this response, the councils are holding a consultation under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. This consultation asks questions intended to help shape the aims, objectives and priorities of the SLP, and includes a 'call for sites'. It closes on 12th March 2024 and feedback will be used to inform the next key stage in the process, which is the 'Preferred Options'. It is intended this will be published for consultation in Spring 2025.

At this early stage in plan-making, whilst it is possible to identify that Gloucester City has a shortfall of sites to provide its housing need, it is not possible to confirm what the overall spatial strategy for the SLP will be, nor to confirm whether or not the Whaddon site is a preferred location for part of Gloucester's housing need to be met.

Gloucester City Council remains committed, through the SLP, to continue to engage with SDC on the SDLPR process.

The main issue for the City Council remains the potential impact this proposed Whaddon development has on the highway network within the area around the site, particularly St Barnabas roundabout, and the wider highways network, particularly in the south of Gloucester including J12 of the M5.

These transport concerns will be better understood through the SDLPR where, importantly, the cumulative impacts of this proposed development will be fully considered alongside other strategic developments proposed in the SDLPR. The Inspectors of the SDLPR have recognised this is essential, pausing the examination to allow new evidence to be prepared to address concerns regarding the strategic and local highway network. Until this work is complete, and the Local Plan adopted, Gloucester City Council believe this planning application is premature.

Notwithstanding the City Council's overriding objection to the planning application, should Stroud District Council be minded to grant planning permission, we make the following comments:

- a) **Permeability and connectivity:** Efforts need to be made to ensure the site is effectively connected to the existing built-up area of the city that the application borders. The illustrative masterplan shows three accesses from the A4173 Stroud Road, and one along Naas Lane, under the railway line. However, no further connections are identified that would connect to existing development Kingsway/Hunts Grove to the west and south-west. Given the range of uses proposed, including primary and secondary schools, there will likely be natural linkages between the areas. Likewise, the northern boundary abuts a potential future development area, and no detail is provided regarding connectivity through this site to Stroud Road and Grange Road. It is considered the level of connectivity as proposed is insufficient and would lead to unsustainable travel patterns.
- b) **Sustainability:** The City Council is keen to ensure to that any development on the edge of the city is self-sustaining in meeting its day-to-day needs such as health, local shopping and community facilities. The aim to reduce unsustainable travel patterns.
- c) **Flood risk:** Daniel's Brook runs through the site and then into Gloucester City. The area immediately downstream of this proposed development has experienced significant flooding in the past and the Environment Agency has implemented a flood alleviation scheme to protect properties in that area. The level of protection afforded by this scheme must not be adversely impacted by upstream run-off and an increase in impermeable area, and ideally it would be improved. There are also risks associated with pollutants entering the watercourse that we would expect to be mitigated at source. These issues relate to the construction phase and upon completion, and we ask that the City Council is engaged in the construction phase Surface Water and Silt Management Plan, and the final detailed design.

Yours faithfully