

Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

| | | | | |
|---|-----|--------------------------------|----|--------------------------------|
| 4.(1) Legally compliant | Yes | <input type="text" value="√"/> | No | <input type="text"/> |
| 4.(2) Sound | Yes | <input type="text"/> | No | <input type="text" value="√"/> |
| 4 (3) Complies with the Duty to co-operate | Yes | <input type="text" value="√"/> | No | <input type="text"/> |

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Section 2.3 An Introduction to the Development Strategy

The strategy (paragraph 2.3.6 page 23) proposes concentrating housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is the best access to services, facilities, jobs and infrastructure. This approach is supported and is consistent with the NPPF and the achievement of sustainable development.

In particular the approach to Cam as set out in paragraph 2.3.14 is supported and also to the approach to Stonehouse as set out in paragraph 2.2.16 is supported.

However, paragraph 2.3.7 also proposes housing and employment growth to be centred on two new settlements at Sharpness and at Wisloe, both within the Berkeley Cluster where there is potential to create new sustainable communities along the garden village principles.

Pegasus object to the proposed Garden Village at Sharpness and Wisloe (this is addressed in detail in our representations to PS36 and PS37).

The SA prepared by LUC to support the Pre-Submission Plan (November 2019) supports the focus on the Tier 1 settlements for strategic growth (para 4.68):

“Directing much of the strategic growth to Tier 1 settlements (Cam and Stonehouse) as well as to the Gloucester fringe area is likely to ensure that most new residents will have a good level of access to existing healthcare facilities and areas of open space, as well as education facilities and cultural facilities. Opportunities to walk or cycle to access services and facilities and employment opportunities are also likely to be greater in those areas. In contrast, strategic growth at new settlements (Sharpness and Wisloe) could leave new residents without immediate access to a wide range of existing services and facilities during the early stages of development. The critical mass provided is likely to support the delivery of new services and facilities as well as the delivery of supporting infrastructure through S016/CIL contributions, which will help to satisfy the needs of residents once the sites are built out.” (my emphasis)

However, the SA alerts the Council to the fact that in the early years at the new settlements, new residents could be left without the access to the wide range of facilities and services and a lack of public transport; in which case these settlements will become reliant upon the private car. Whilst the SA indicates that the critical mass to support the delivery of new facilities and services will be obtained through S106/CIL contributions, this statement is made in the absence of the Infrastructure Funding Statement (which should be prepared in accordance with the PPG Plan Making) and any detailed viability evidence to support the new settlements.

The SA (paragraph 4.71) also alerts the Council to the implications of the delivery of 2,400 dwellings at Sharpness as this location is in close proximity to the Severn Estuary SSSI/SPA/SAC/Ramsar site and therefore there is potential for adverse impacts on these internationally designated sites.

For the reasons set out in our representation to Policy PS36 the inclusion of a new settlement/garden community at Sharpness is unsound.

Similarly for the reasons set out in our representation to Policy PS37 the inclusion of a new settlement/garden community at Wisloe is unsound.

In so far as the strategy is prepared for other areas of the district i.e. to meet wider development needs and to support and improve existing services and facilities at smaller towns and larger villages with modest levels of growth, this is supported. This approach applies to the local service centres of Berkeley, Minchinhampton, Nailsworth and Painswick. Lesser levels of growth are proposed at some of the villages including Whitminster.

The strategy also considers the possibility of needing to meet some of Gloucester’s future housing needs through the JCS review. This would be undertaken through the duty to co-operate. It is noted that at this stage pending further work on the JCS review, a site at Whaddon is safeguarded in the Plan to meet some of the future needs of Gloucester City if required. If this land is not required to meet some of the City’s future needs Pegasus would

object to land at Whaddon coming forward to meet Stroud's needs, as such an approach would result in approximately 5,100 dwellings in the Gloucester fringe meeting Stroud's needs, i.e. 64% of the residual housing requirement as currently proposed (i.e. with Hunts Grove and South of Hardwicke. Stroud's needs should be met across the district at the most sustainable locations where it's needs arise.

In conclusion, it is considered that the inclusion of two new settlements is not consistent with the Plan's strategic objectives.

SO1 Accessible communities:

"New development will be located primarily within or adjacent to large settlements, where people can benefit from existing facilities and services that would be readily available and accessible." Sharpness is proposed as a new free standing garden community, so it does not benefit from any existing services or being in close proximity to any, it is not located on the Sustainable Movement Corridor and consequently early residents will be travelling out of the area for their everyday needs. The Local Plan states that Sharpness will function as a new Local Centre once complete (Tier 2) page 175, however it is not clear when the new settlement will be complete as further development is envisaged beyond 2040 but no details are provided, such details relating to any second phase will be prepared during a subsequent review of the Local Plan para 3.5.19). Even for the proposal in the current plan period to 2040 there is a lack of justification as there is no detail IDP and estimated delivery, timing and costs of infrastructure or detailed housing trajectory has been prepared, it is not possible to understand the construction programme and when key areas of infrastructure will be provided and the means of delivery and this relates to the delivery of housing.

Whilst SO1 states that ***"New settlements will be of sufficient size to provide a range of new facilities and services to support neighbouring communities. Services such as new schools, GP surgeries and leisure provision require a certain threshold of people within their catchment area to be viable"***

However, it is not clear what the thresholds are for service provision and no details and timing of the delivery of infrastructure has been provided.

SO1a: Healthy, inclusive and safe communities

Larger developments can provide opportunities to design in measures to support inclusive communities and healthier lifestyles: by creating a range of house types and tenures to meet differing needs; by creating layouts, a mix of uses and public spaces which offer natural surveillance and support social interaction; by creating walking and cycling routes that support active travel; and by delivering attractive wildlife and recreation corridors to support a sense of wellbeing.

SO2: Local economy and jobs

"The development of employment sites in the M5/A38 corridor will mean that development can be located close to strategic road and rail networks and in places that business wants to be. It will create the opportunity to provide a range of units from large warehousing and distribution units down to offices and smaller industrial units, possibly as startup businesses."

Planning for employment together with housing also provides the opportunity for residents to work locally and to reduce out commuting levels."

Development at Sharpness is **not** well located in respect of the Sustainable Movement Corridor. The Employment Land Review has concluded that land at Grove End Farm, Whitminster "... ***would seem to be the strongest of the options. Land here is optioned to a commercial developer who is already active locally, marketing/developing E/BClass plots at SA2: West of Stonehouse, so has existing knowledge of local market conditions. Positioned at Junction 13, M5 it can tap into both the M5 Corridor market and demand for Stonehouse, a centre for both B2/B8 business expansion in the Stonehouse/Stroud Valleys area and for larger E1(g) (i) offices. It would be well placed to meet longer term growth needs if employment land around Great Oldbury is taken up relatively early in the Plan period. Assuming the Eco Park proposal was brought forward, critical mass around Junction 13 would further increase, with the area becoming a centre for advanced manufacturing in Stroud District"***

SO4: Transport and travel

"By concentrating development at locations where new and improved public transport and active travel routes will be prioritised and integrated, the strategy should deliver convenient, safe and healthier alternatives to the private car (to serve both existing and new communities)."

It is considered that the inclusion of Sharpness as a new settlement is inconsistent with the NPPF para 103 which states that "***Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.***" (my emphasis). As explain below and in our detailed representations on PS36 a new settlement at Sharpness will not be able to support a viable genuine choice of transport modes.

The new settlement at Sharpness is not within the key movement corridors identified in the Stroud Sustainable Transport Strategy (STS) (February 2021) prepared by AECOM, and it is not considered to be deliverable in the plan period.

The Stroud Sustainable Transport Strategy, (STS) referred to above states that the topography and settlement pattern of the district results in high levels of demand being funnelled along key movement corridors. Three main movement corridors are identified where integrated packages of initiatives can be delivered, which can "***showcase multimodal use with a focus on sustainable travel modes.***"

The Sustainable Transport Strategy acknowledges that Sharpness has an issue of relative remoteness, particularly in public transport terms, (page 29) there is a lack of a regular bus service to the area. The STS states that this "***remoteness***" could assist with internal self-containment, however this creates social and economic isolation.

Whilst the STS states that, "***A comprehensive provision of facilities on site will lead to a greater amount of trip internalisation, which will increase the sustainability of the site through a reduced number of external trips to/from the site. This will need to include primary and secondary education, employment, shops, leisure and community facilities.***" There is no evidence of when these facilities will be provided, at what cost and how they will be delivered.

In the meantime unsustainable trips are established leading to more congestion on the network.

Reference is also made in the STS that ***“the applicant for Sharpness advised that the re-opening of the Sharpness railway branchline for passenger services is feasible and can deliver an attractive train service to Gloucester. In advance of this, or if this is not feasible, express bus/coach services to Bristol and Gloucester will be needed to fulfil this demand.”*** Again there is no evidence, the feasibility study has not been produced and again no detailed programme or costings which underline the question of viability of such a proposal.

It is clear from representations made by Stagecoach that Sharpness is not regarded as a location that can be well served by public transport.

Given the above it is imperative that locations for development are deliverable and offer a real choice of transport modes and that resources are focussed where they can achieve the greatest benefits. It is considered that development at Sharpness, a location which is some significant distance from the key movement corridors and major centres of employment cannot provide a sustainable opportunity for development. As outlined in our representations to Policy PS36 a new settlement at Sharpness cannot be justified and effective and is therefore considered to be unsound.

SO5: Climate Change and environmental limits

“The strategy prioritises suitable sites that are located close to the District’s main settlements (to ease access to services, jobs and transport infrastructure, thereby minimising the need for daily travel by car) and at exemplar new settlements and strategic employment sites, which will promote zero and low carbon development and green technologies.”

It is considered that Sharpness will not deliver the “exemplar new settlement”. The current Local Plan (2015) focusses on identifying those settlements that offer the best opportunities for sustainable development, this emphasis on sustainability is continued in the local plan review, however with the climate change agenda becoming a priority issue, there is even more of a focus on sustainable and deliverable development. It is considered that land at Sharpness does not provide that opportunity for an exemplar new settlement, 2,400 dwellings is less likely to achieve significant levels of self-containment.

The NPPF states that plans should be prepared positively, in a way that is aspirational, **but deliverable**.

Due to the level of environmental designations and constraints in and around the proposed development area, which will require extensive mitigation, this will have a significant impact on viability and hence deliverability of the proposal. In turn this may also impact on the ability of this proposed development to deliver other policy requirements of the Plan.

It is considered that the proposed new garden village at Sharpness will not achieve the above and deliver the number of dwellings anticipated in the plan period.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The new settlement at Sharpness should not form part of the strategy, the allocation should be deleted and a the sustainable alternative development at Grove End Farm, Whitminster should be included. This is covered in more detail in our objections to PS36 Sharpness.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our objections go to the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

