

Objection to site allocation PS36 Sharpness new settlement

Who are we...

The Berkeley and Sharpness Residents Action Group (BaSRAG) is an action group representing the concerns of local people about development proposed in the Stroud District Local Plan Review between Berkeley and Sharpness in the Berkeley Cluster. We are particularly concerned about the Council's proposals for a 'growth point' between Sharpness and Berkeley - allocation PS36 - in a so-called "garden village" of initially 2,400 houses but leading to 5,000 houses by 2050. The group was formed following locally organised residents' meetings held in both Sharpness (Dec 2018) and Berkeley (Jan 2019). A website has been set up by local residents to help keep the local community informed of local planning and developments - <https://basrag.com>.

Summary of our Concerns

We believe that meeting the housing needs of the district is poorly served by the proposal to allocate approximately 1,000 acres of greenfield land for a new settlement of 2,400 houses (rising to 5,000 houses by 2050), at Berkeley-Sharpness. This approach does not accord with the second key issue, (set out on page 11 of the Pre Submission Plan), of concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure. It lies outside the key movement corridor of the A38/M5 identified in the Local Plan. Furthermore, it is not consistent with concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.

This proposal does not meet the requirements of para 72 of the NPPF. The proposal is not well located and the design, whilst in its infancy, does not appear to address adequately the environmental harm it will bring. The infrastructure requirements for this proposed development are extensive and will be expensive putting the viability of the proposal, and hence delivery, at great risk. As the author of the Place Alliance/CPRE report (A Housing Audit for England) issued 21/01/2020 (see <https://indd.adobe.com/view/23366ae1-8f97-455d-896a-1a9934689cd8>) has acknowledged, many developers cannot be trusted to deliver on their 'promises' but put profit before design, including the delivery of appropriate amenities. No guarantees or safeguards have been put in place for this proposal about design, infrastructure, transport etc. There is little to no community support for this proposal. The economic potential of the area is poor relative to the more established towns in Stroud and in particular the Gloucester-Cheltenham focus promoted in the wider County economic strategy (see <https://www.gfirstlep.com/downloads/2018/sep-2-update2018v3.pdf>). There are unlikely to be net environmental gains. Employment within the proposed community itself is unlikely to attain a decent degree of self-containment. Access is not good to nearby larger towns and out-commuting is likely to continue or worsen. Garden City principles are referenced in the Plan but not enshrined in policy.

In addition we have had concerns about the whole process of plan making conducted by the District Council. These are expressed in our Annex1 to this representation. We are also aware that through previous Local Plan examinations in other parts of the country Local Plans have been found to be unsound. Annex 2 to this representation refers to cases that in our view have similarities with this Local Plan Review and we ask the Inspector to bear these decisions in mind when considering the Stroud Local Plan Review.

We expand upon our concerns below:-

Area of concern: Infrastructure

(1). Cost of infrastructure

The high cost of infrastructure delivery is likely to make site PS36 not viable in the plan period. In the evidence base accompanying the Plan there are no infrastructure spending plans linked to the Community Infrastructure Levy, Section 106 provisions and other funding sources. Compared to other more sustainable locations possible for growth (eg. As considered in the Additional Housing consultation at Whitminster - PGP1 & Moreton Valence - PGP2) the infrastructure needs and burden would be far greater. The Berkeley-Sharpness area is poorly connected by public transport and heavily dependent on commuting patterns, especially to the Bristol area, and would require far greater interventions than locations in the A38/M5 corridor.

(2) Timing of infrastructure delivery

Early delivery of infrastructure, especially that related to transport, is critical to the delivery of PS36 according to the Garden Village Principles allegedly to be followed in taking this development forward. There is no indication that infrastructure will be delivered early in site development and that the proposed modal shift away from car use will be achieved. Indeed, wordings in policy such as “timely” and “at the right time” are vague and do not give confidence of a programmed delivery of infrastructure. In particular the central tenet of the proposal to re-open the Sharpness branch rail line, connect it to Cam & Dursley Station, build a new station at Sharpness etc is unsupported by any evidence to suggest it is viable or deliverable.

(3) Reliance on developer’s promotional material

The Council has not undertaken its own studies for infrastructure provision and has relied too heavily on the promotional material and studies undertaken by the promoters of PS36. Para 157 of the NPPF says it is ‘...crucial, Local Plans should plan positively for development and infrastructure in the area...’. The lack of evidence in relation to transport and infrastructure reinforces concern that the PS36 Garden Village proposal is not justified and effective.

(4) Late Evidence re Infrastructure

The Stroud IDP and the Local Plan Viability Assessment have been produced very late in this plan making process (May 2021) and appear to have been devised to support a predetermined strategy rather than inform the plan making process. Additionally, they are lengthy and difficult documents to comprehend and the public have not been given adequate opportunity to comment on them.

(5) Lack of support from infrastructure providers

Responses to the earlier consultations in the plan-making process from authorities and organisations, including Statutory Consultees, involved in the provision of infrastructure cast great doubt on the ability for the promoted infrastructure to be delivered. These include responses to the Draft Plan from

- Stagecoach (<https://www.stroud.gov.uk/media/1165825/00405e-stagecoach-ps36.pdf>,
- Network Rail (<https://www.stroud.gov.uk/media/1165651/00271a-network-rail.pdf>),
- Gloucestershire County Council (<https://www.stroud.gov.uk/media/1165954/00486b-gloucestershire-county-council.pdf>) and
- Wessex Water Authority (<https://www.stroud.gov.uk/media/1165802/00394-wessex-water.pdf>).

(6) Transport Infrastructure

- Rail - The Sharpness options do not create significant economic value compared to other improvements tested, particularly when set against the substantial capital costs involved. (See Chapter 9 and para 12.2 of the Gloucestershire Rail Investment Strategy March 2020 - <https://www.gloucestershire.gov.uk/media/2096940/gloucestershire-rail-strategy.pdf>)
- Stroud DC/the site proposers have made one unsuccessful bid to the Restoring Your Railways Fund. A second bid (https://www.stroud.gov.uk/media/1605137/restoring-your-railway-sharpness-bid-2021_redacted.pdf) is awaiting decision as we write. This sits alongside another bid to reopen the Stonehouse Bristol Rd station that has far better prospects for success.
- The Bristol-Birmingham Corridor Study was published by Network Rail in June 2021. (<https://www.gloucestershire.gov.uk/media/2108166/bristol-to-birmingham-corridor-strategic-study-final-report-v10.pdf>). There are no references in this to rail improvements either in the form of reopening the branch line or building a new station at Sharpness.
- Highways - transport modelling has identified 7 capacity pinch points within Berkeley Cluster. The Sharpness new settlement proposal can only be accessed from three of these and minor improvements are suggested only at the B4066/A38 junction thus retaining the “one road in - one road out” access to the proposed site.
- There are also identified capacity issues at M5 j13 and j14 that will require major improvement works. These are not designed or programmed and would require considerable collaboration between a number of developers, local authorities and Highways England in order to deliver. It is highly unlikely that delivery of such improvements would come early in the development process for Sharpness new settlement and would contribute significantly to the infrastructure costs for the development.
- In short, considerable mitigation would be required to overcome highway capacity issues that is so far not designed, not programmed, not costed and not agreed by the developer.
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(7) Flood Risk

- The Stroud Flood Risk Assessment May 2021 (appendix P, page 74 et seq) (<https://www.stroud.gov.uk/media/1485555/appendix-p-2018s1377-stroud-l2-sfra-all-sites-v30->

[may-21.pdf](#)) indicates that there are unknown detailed factors in connection with flood risk at PS36. Further information is required on these aspects before the site can be confirmed as viable and deliverable.

- A detailed site-specific FRA and surface water drainage strategy is required. Whilst it is stated this should come at the planning application stage, as allocation in a local plan is tantamount to receiving outline planning permission, we believe that a site specific FRA should precede any Local Plan allocation and form part of the evidence base to inform the proposal.
- There is no information in the Stroud IDP Oct 2020 about the works required or costs associated with flood risk mitigation. It is likely these will be considerable and will add to the burden of development costs for this site. This is another area of uncertainty that leads to questions about the site's viability and deliverability.

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(8) Education

- The Stroud IDP Oct 2020, (<https://www.stroud.gov.uk/media/1485685/sdc-idp-main-report-may-2021-clean.pdf>), indicated the high cost of education provision (in the order of £32+ million across early years, primary, secondary and FE provision) at PS36 that will contribute to the high development costs.
- There is no policy requirement for early secondary school provision on site. The policy merely suggests contributions to be payable towards provision. Local knowledge suggests that existing secondary schools (principally Rednock in Dursley and Katherine Lady Berkeley in Wotton-Under-Edge - both over 5 miles away from this site) are already at or near capacity. Early provision of secondary school provision in particular is considered essential if this proposal were to proceed. Otherwise it will lead to an increase in out-commuting to and from schools out of the immediate area.
- The former Berkeley Vale College (now part of the OneSchool Global UK network of faith-based schools) is perversely now allocated for development (PS35) despite currently being in use as a school for primary and secondary pupils. This site should be retained for education purposes to serve the education needs of any enhanced population in the area if any further development proceeds.

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(9) Health

- Currently there are no dental surgeries or secondary or tertiary care providers in the Berkeley Cluster. All will need providing for.
- PS36 will require at least £3.8m towards the health provision needs of its population according to the Stroud IDP.
- No specific social care facilities are being provided for and the expectation is that the private sector will respond! There is no commitment to any particular facilities in the proposers promotional document - Sharpness Vale: Natural Neighbourhoods. Nov 2019 (https://www.sharpnessvale.co.uk/wp-content/uploads/2019/11/P16-0821_18C-Sharpness-Natural-Neighbourhoods-003-002.pdf), only general references to "...social and physical infrastructure...".
- The nearest major hospitals to PS36 are over 20 miles away in Gloucester (Royal Infirmary) and Bristol (Southmead Hospital and Bristol Royal Infirmary). Travel to these facilities is lengthy and

difficult, especially for those without cars. There is no provision for how people will reach these facilities in their times of need.

- There are long lead times for provision of all new health facilities and the Stroud IDP does not address this issue. It is considered unlikely that new residents of this settlement would be well served in the early stages of development and it is unclear what provision would be made in the longer term. Again provision of health facilities is not designed, not programmed and not costed.

(10) Green Infrastructure

- Open space & green infrastructure provision in the Stroud IDP is estimated to cost £9.1m for site PS36 adding to high development costs and adding to questionable site viability and deliverability.
- The Sustainability Appraisal May 2021, (https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review_pre-submission-may-2021.pdf), notes in paragraph 5.49 at page 129 that biodiversity risk will need to be '*resolved through site design and project level HRA.*' Therefore there may well be further green infrastructure works and costs that are presently unknown and not accounted for in the Stroud IDP.
- It isn't clear whether green infrastructure costs includes mitigation costs for the adverse effects of development on the Severn Estuary SAC/SPA/Ramsar site. The preliminary estimates in the Stroud IDP based on 2017 prices cost this at £385 per dwelling - adding at least a further £1m to infrastructure costs when inflation is taken into account.

Area of concern: Transport

This proposal lies outside of the key movement corridor of the A38/M5 identified in the plan to be the focus for new development. A new settlement of 2,400 dwellings (5,000 by 2050) would exacerbate existing commuting patterns out of the area to the workplaces and higher level services and facilities (shops, secondary and further education, hospitals, social and leisure etc) found further afield in Cam/Dursley, Stonehouse, Stroud, Thornbury, Yate, Bristol, Gloucester and beyond. It would place great pressure on the A38 and the M5 junctions at j13 and j14 to the extent that major upgrades to the junctions would be necessary. Public transport is virtually non-existent in the area and there is disputed evidence about the deliverability of public transport to support this proposal. Particularly during the early stages of the commencement of the development neither employment or a wide range of facilities and services will be available on the development site, or within reasonable walking or cycling distance thus exacerbating existing commuter patterns by car.

Transport links for Berkeley and Sharpness proposed development

In their (failed) 2018 bid to join the Garden Communities Programme and receive Government support and funding, the Stroud District Council and Sharpness Development LLP recognised that transport was one of the key risks for this development and there is the requirement for the basics to be in place in order to make this proposal viable:

“The potential to create a new settlement of around 5,000 homes at Sharpness will require:

- A comprehensive pedestrian, cycle and public transport offer will be vital to ensure sustainable travel is a viable option for the proposed development.*
- New public transport services connecting the new development with the existing settlements of Berkeley, Cam and Dursley will be required for buses.*
- The level of traffic generation from the new settlement is likely to require improvements to be made to existing local junctions (to ensure safety and capacity requirements are met) and, especially with further growth, the need for improvements to the strategic road network, i.e. the A38 and M5 junctions”* (Source: page 18 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/897932/RFI2943_-_Garden_Village_Community_Settlement_at_Sharpness.pdf)

In the Stroud IDP May 2021 it states:

“The proposed allocations at PS34 Sharpness Docks and PS36 New settlement at Sharpness have an issue of relative remoteness, particularly in public transport terms. This increases demand for private car usage.” Source: page 27, <https://www.stroud.gov.uk/media/1485685/sdc-idp-main-report-may-2021-clean.pdf>)

There are three potential transport options for the new residents of the proposed Sharpness new settlement (PS36). Taking each one in turn, we consider any merits and barriers to success.

Creation of a new station halt at Sharpness

The Developers have talked of a new station/halt at Sharpness and reopening the branch line which will connect to the main line (source: page 22 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/897932/RFI2943_-_Garden_Village_Community_Settlement_at_Sharpness.pdf)

There are questions about the viability of this proposal due to the following:

Potential routes

The Sharpness branch line formerly connected Sharpness and Berkeley to the Bristol-Gloucester mainline, but was closed to passenger services in 1960. The northbound link (to Gloucester) is occasionally used for freight carrying in connection with the former Berkeley Power Station. However, the southbound link (to Bristol) has been removed and the land partly redeveloped making it virtually impossible and certainly not cost effective to re-open. Therefore any re-opening of the Sharpness branch line could only be northbound. This being the case, anyone wishing to commute to Bristol, (the direction of travel for most commuters from the area), would need to take a train from Sharpness and change at Cam & Dursley station to then head south.

In practice, this means that commuters would need to get to the new halt (where parking would need to be provided), then take the northbound journey to Cam & Dursley taking between 10-20

minutes according to the developers' proposal, then wait for a connection south to Bristol. We understand that significant development (new sidings) at Cam & Dursley Station would be required to accommodate the new train services, to separate it from the main line. In addition new signalling work would be required and the existing line repaired/upgraded.

It should also be noted that on the section of the line which is still usable, any passenger train would need to share the line with rail services that run nuclear waste on trains to Sellafield in Cumbria and the proposed Vale of Berkeley Heritage Railway running tourist trains should they become successful in their bid to re-use the line.

We consider the likelihood of passengers choosing this option is remote due to the time such journeys would take and the likely costs compared to the convenience of travel to work directly by car or to Cam & Dursley Station and then boarding a train.

Timetabling

Trains would need to join the northbound mainline track, which currently has a timetable designed to accommodate regional and intercity trains. We have been advised that adding a slower local train service into the timetable would not be possible as the timetable for the main line is operating near capacity. Confirmation of the ability to accommodate a new service from the branch line from Sharpness should be sought from Network Rail before the Sharpness proposal is approved. Network Rail's recently (June 2021) published Bristol-Birmingham Rail Corridor report (<https://www.gloucestershire.gov.uk/media/2108166/bristol-to-birmingham-corridor-strategic-study-final-report-v10.pdf>) does not mention new services linking from Sharpness despite being aware of these development proposals. We can only conclude that Network Rail does not support the reopening of the branch line or does not consider it a viable option in the foreseeable future.

Viability

The budget that would be required to develop the new station/halt and works required to accommodate new rail services has not been identified, nor allocated to this activity. The Council/developers have acknowledged in their "Bid to Join Garden Communities Programme" document, that:

"The route is currently single track and would likely require significant upgrade if frequent passenger services were to resume" and;

"Two new stations could be provided, and these have been factored into the initial masterplanning work including:

- 1. Sharpness Docks: the terminus of the line, providing access to the existing employment opportunities and proposed leisure, and*
- 2. Central Hub: within the mixed-use centre, close to the new villages and providing access to retail and community facilities."*

The financial viability for the two new stations or halt is brought into question, as the opportunity to recoup the costs for this development through ticket pricing is limited and no evidence has been produced to demonstrate its viability. Commuters will only expect to pay a nominal ticket price for a journey that cannot head southbound, with the price set being unlikely to redeem the overall cost of the development of the new halt.

In addition NetworkRail confirmed the current line is limited to train speeds of up to 15mph providing a further constraint on potential passenger services (Source: page 131 <https://www.networkrail.co.uk/wp-content/uploads/2016/12/Western-Route-Specifications-2017-V2.pdf>).

These issues are acknowledged in section 9 of the Gloucestershire Rail Strategy that considered new services utilising the Sharpness branch line. (Source: <https://www.networkrail.co.uk/wp-content/uploads/2016/12/Western-Route-Specifications-2017-V2.pdf>)

“Although the line already exists significant work would be required to reopen the route to passenger traffic including the construction of stations, upgrading of permanent way and signalling and in some options the opening of a south facing chord to allow trains to run direct from Sharpness towards Bristol without reversal.”

“Although the results are in the order of £2m per annum it should be noted that the level of investment required to deliver this would be much higher than for a service alteration to an existing route. There is also a question over the opportunity cost associated with the use of scarce capacity for such services, which could be used for services delivering greater value.”

“Options around Sharpness, and the Severn Bridge generate limited benefit relative to the costs involved.”

The Developers have provided no evidence to show that a new station/halt can be successfully achieved, and this appears to be wishful thinking on their part.

The question of viability is also demonstrated in the failure to secure any funding via the first round of the 'Restoring your Railway fund'. At the time of writing a second bid has been made and the outcome awaited. There is no evidence to suggest this bid has any greater chance to be successful'

The response to the Draft Local Plan consultation in Jan 2019 by Stagecoach (see <https://www.stroud.gov.uk/media/1165833/00405a-stagecoach.pdf>) supports this view and should be taken into consideration due to their transport expertise. The following extracts refer to their comments on re-opening the Sharpness Line. Referring to the County Council's Local Transport Plan (LTP), they said ...:

“As far as the Sharpness Branch Line is concerned Draft policy PD5.1 goes as far only to state that the County will 'Protect the freight line at Sharpness for future use'. This is no more practical value

than the effective policy that the rail industry has had for the line for over 25 years. It falls short of even taking any evidenced view as to the feasibility of this, much less a commitment to a definitive project.”

“Simply put, improved services and facilities on the railway through Stroud District lie beyond the power of any local stakeholder to deliver, and there are no well-defined or funded rail industry plans at this time to bring any of the aspirations forward....”

“Given the way that the railway has been a key articulating and structuring principle behind some major aspects of the Local Plan strategy, not least the new town at Sharpness Vale, justified until very recently by the claims that it could be sustainably facilitated by the re-opening of the Sharpness Branch, this ought to give both the Councils pause for some very serious thought indeed.”

“We are aware that Gloucestershire County Council has commissioned a major study to evaluate the relative technical feasibility and business cases for a full range of projects and intervention on the railway in the County, having regard as far as possible to the rail industry and DfT’s larger scale commitments and project planning. We welcome this Gloucestershire Rail Investment Strategy (GRIS), which will sit alongside and no doubt help inform the final LTP. It will among other things, provide all stakeholders, including Local Planning Authorities and development promoters, with some very useful clarity – “a sense check” - on the relative merit and feasibility of potential projects. While we are apprised that the Final Report has been received it has not yet been published. This is disappointing.”

“However, based on our extensive experience and knowledge of passenger transport planning and operation across all modes, nationally, we would be quite astonished if the GRIS has concluded that re-opening the Sharpness Branch line to passenger rail services will ever present a justifiable business case, especially when to do so would prejudice capacity and frequency upgrades on the whole line between Bristol Gloucester and beyond, serving a vastly wider range of potential trip demands.”

The responses from StageCoach fully support our opinion that the Sharpness new settlement proposal is unsuitable and should be read in its entirety.

On reviewing Network Rail’s Long Term Planning Process for Western routes no enhancements of any kind are mentioned for Sharpness. (See <https://cdn.networkrail.co.uk/wp-content/uploads/2016/11/Western-Route-Study-Final-1.pdf>). This again would indicate that they don’t see this as a viable plan or priority. However, to confirm this the opinion of NetworkRail should be sought before any approval is given.

Bus transport

The Local Plan states that the development will, inter alia, “*prioritise ... public transport over use of*

the private car". It also says " *the development will provide direct and attractive coach/bus services to key destinations including Bristol and Gloucester and contributions towards extending local bus services.*" The alternative of travelling by coach or bus was proposed by the developer, and specifically rerouting and improving the Stagecoach 62 route in their Garden Communities Programme bid (Source: page 12, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/897932/RFI2943_-_Garden_Village_Community_Settlement_at_Sharpness.pdf). More recently in section 3.2 of their Transport Technical Appraisal, (see <https://www.stroud.gov.uk/media/1485653/sharpness-47.pdf>) the developers propose a range of bus services to serve residents of a new settlement.

Stagecoach, the major bus operator in Stroud District, raised significant concerns to the bus service provision proposals, and indeed to the whole transport and movement strategy proffered by the developer in pages 5-9 of their response to the Draft Local Plan in relation to PS36 (<https://www.stroud.gov.uk/media/1165833/00405a-stagecoach.pdf>). In summary they completely reject the offerings made by the developer, and the premise that this can be made a sustainable development by the provision of a range of public transport services. They question the viability and the deliverability of the proposed services. We, BaSRAG, do not have the relevant knowledge and expertise to dispute the developers' claims but we would rely on the knowledge and expertise of Stagecoach in operating public transport services in the area to conclude that the developers proposals are unworkable. The following extracts from the Stagecoach representations capture their overall views...

"In terms of the spatial strategy, this potential is all but entirely overlooked, in favour of the expansion of Sharpness Docks (where there is virtually no pre-existing community) and a new/ expanded community focussed on Sharpness/Newtown. These sites depart entirely from what is set out in the evidence base, not least, they are the only draft strategic allocations that lie well adrift of the Sustainable Movement Corridors in the STS, which should be the focus for growth. Here the Strategy purports to take advantage of 'the opportunity to transform local transport facilities through a new rail station with services to Gloucester and rapid bus services to main towns including Bristol' to create a large new settlement that, at full build-out beyond the Plan period, would actually become the District's second largest town. As we point out at length elsewhere in our representations, this potential is illusory. As one of the UK's largest public transport providers, both of bus, coach and rail services, we would re-state once again, unequivocally, that we see absolutely no realistic prospect of relevant public transport services by road or rail being deliverable to this area during the plan period.

"Our concern is that the basis on which key judgments have been made are ill-informed and at times, seriously flawed, especially with regards to Sharpness."

The view of Stagecoach is that any new housing development should be closer to the A38 and the Cam & Dursley rail link which we would agree with. We respectfully recommend that the Local Plan Examination Inspector(s) read the Stagecoach submissions in their entirety.

Commuting by Car

The site of this proposed new settlement can only be reached by car via three exits from the A38. The Developers have acknowledged that there are significant car transportation issues;

“local road connections back to the A38 will require substantial improvements early on in the development.”

Proposals for the extension of the Berkeley bypass from the A38 to access the Berkeley and Sharpness area would be reliant on the co-operation of owners of The Berkeley Estate as this would need to pass through their land. In their response to the Draft Local Plan, the Berkeley Estate voiced their concerns to any such proposal and had wider concerns about the impact of traffic on the area. (See paras 27-31 https://www.stroud.gov.uk/media/1165853/00421-savills_the-berkeley-estate.pdf).

Our views on the three exits to the A38 follow:

Bristol Road/Halmore Lane

Halmore Lane exits at a tricky junction at The Prince of Wales Hotel. Turning south onto the A38 requires crossing over the busy A38 northbound lane with fast moving traffic. In addition there is limited visibility to the north due to the obstruction caused by the A38 bridge over the rail line.

Halmore Lane itself is of low standard comprising approximately 2.5 miles of winding road. It passes one of the largest specialist equine vets practices in the southwest, and subsequently there are frequently horses being exercised along this lane. It is not considered appropriate for large increases in traffic volumes. Any increase in traffic has the potential to cause significant road safety issues and an increased risk of accidents. The County Council have suggested that no road improvements should be made here in order to discourage traffic from using it to access the proposed development.

Berkeley Heath - B4066

Entering the Berkeley area from the north via Berkeley Heath again requires the driver to cross the busy and fast A38. The B4066 has soft verges which have caused a number of vehicle incidents. It is increasingly used by HGVs to access the Severn Distribution Centre and the Sharpness Docks businesses causing noise and vibration disturbance to domestic residential properties along the road. There are already queues of vehicles at its junctions during busy periods, making it unsuitable for larger volumes of traffic. This will be exacerbated further by the proposed new large distribution warehouses that have planning permission just outside Sharpness docks.

Local residents have expressed concern for many years as to the volumes of traffic and the increasing size of vehicles using this section of road. There are no footpaths for pedestrians and bus stops are not set into lay-bys. In our view, this road is not able to safely support an increase in traffic. The road is expected to exceed capacity with the introduction of the

various Local Plan developments in the area including PS36 and mitigation measures will be required. The overloading on this road may well be far worse than the developers or SDC forecast if the assumptions made in securing modal shift from the car to other transport means is not achieved. Previous comments regarding the issues with bus and rail provision suggest this will be the case. In addition Stroud's own Traffic Forecasting Report (see <https://www.stroud.gov.uk/media/1484473/final-report-main-report.pdf>) states that ... *"the assumed scheme for mitigation does not address link capacities along the A38 and further consideration to link improvements may therefore be necessary"*.

Alkington Lane

For several years, Alkington Lane has been identified as a risk due to the soft verges and bends and there have been a number of accidents along this stretch of road, particularly involving large HGVs overturning on the dangerous bends along the Lane.

Capacity is an issue, as queues of vehicles sit at its exit, and in common with the other routes into Berkeley, drivers are required to cross the A38 to access and exit the area. This junction is expected to significantly exceed capacity with the inclusion of the development proposals in Stroud's Local Plan. Significant works would be required that include third party land to mitigate the excess capacity.

Further afield, the motorway junctions joining the M5 both North (j13) and South (j14) are at or nearing capacity with long queues experienced during rush hour traffic, as widely recognised by the Local Authorities (Glos CC, Stroud DC and South Glos Council), Highways England and various developers with proposals impacting on that junction.

An original proposal to add a new motorway junction between Falfield and Stroud has been disregarded and therefore any increase in road traffic will cause significant difficulties at the M5 junctions and on the A38.

A M5 Junction 14 working group containing prospective developers, South Gloucestershire Council, Gloucestershire County Council, Stroud District Council, and Highways England has been established to examine highway mitigation options and how these could be jointly funded. However, this is in early stages of development and in our view it is unlikely, with the long lead in times for such highway works, that a scheme will be deliverable in time to meet the demands of Local Plan allocations such as PS36.

Other alternative transport options

The Developers propose a "comprehensive network of walking and cycling routes" which would include creating a new bridge at the B4066. As identified by Stagecoach, these routes would only be suitable within the settlement, as any other destinations for employment and services outside of Berkeley/Sharpness are too far away to be reached conveniently by foot or bike. Akin to the rail link, any costs would need to be considered for their return on investment.

Area of concern: Employment

The proposed new settlement does not adhere to Garden Village principles in relation to proximity of employment opportunities in the vicinity of a new garden village settlement. Two key principles under this heading are;

Garden Cities must provide a full range of employment opportunities, with the aim of offering no less than one job per new household.

A clear industrial strategy must be established at the inception of a new Garden City. It should engage private sector employers and key players in the knowledge economy, such as research and educational partners. This strategy should also quantify the outcomes of other key Garden City principles in building a local economy

(Source. The Art of Building Garden Cities. TCPA July 2014)

Neither of these principles - that apply equally to the concept of a garden village - are achieved in the proposals for the Sharpness new settlement.

There are very few employment opportunities within the immediate area and despite efforts to attract employment for over 30 years, these have met with very little success. It is evident that the market is not interested in this as a location for employment. The allocation of 10 hectares of land for employment uses is totally inadequate to address the future employment needs of residents of 2,400 new households in the plan period let alone the total of 5,000 new households promoted to arrive by 2050. The last allocation of 9.8 hectares in the 2015 Local Plan has only recently been developed for a large warehousing facility that is likely to employ only around 200 people. The idea that more employment-intensive uses will be attracted to a site of 10 hectares to provide a higher level of self-containment is without foundation. Evidence of the last 30 years indicate this will not happen.

Simply put, this is the wrong geographical position for prospective employers / commercial enterprise. It is relatively isolated - too far from Bristol/Gloucester and constrained by River Severn on opposite side. There are very limited public transport links, and it is not in close proximity to the motorway network that new enterprises seek. The Gloucestershire Strategic Economic Plan (SEP) update 2018, (see <https://www.gfirstlep.com/downloads/2018/sep-2-update2018v3.pdf>) focuses economic growth on the M5 around junctions 9, 10, 11 and 13. Page 21 of the SEP states:

“The Growth Zone seeks to identify and secure the availability of quality employment land in proximity to the M5 motorway corridor that is attractive to businesses and has excellent connectivity throughout Gloucestershire and to the rest of the UK. The importance of the M5 in this context remains as significant now as it was in the original SEP.”

The same strategy identifies the UK Cyber Business Park: Cheltenham near Junction 11 of the M5 as the major growth point for the County.... “£22m of funding has been secured through the Local Growth Fund (LGF) to deliver the enabling infrastructure necessary for a dedicated Cyber Park in

Cheltenham, building on links with the Government Communication Headquarters (GCHQ). The 45ha of employment land are situated to the West of Cheltenham, close to GCHQ. The Cyber Park will draw on the strength and worldwide importance of Cheltenham's pivotal strategic location for cyber security. The scale, location and potential connectivity of this site presents a once in a generation opportunity to create a world leading Cyber Park, centred around the Cheltenham National Cyber Innovation Centre announced by the Government in 2015." It is our contention that growth in Stroud should recognise this and seek to place new development to the north of the District and take advantage of the more sustainable transport links to the economic centre of the County.

In comparison, the site promoters ambition (para 5.9 <https://www.sharpnessvale.co.uk/wp-content/uploads/2021/05/Sharpness-Vale-Vision.pdf>), for the land allocated at Sharpness to be a knowledge-based business park is considered unrealistic. Perhaps the Council share this view as at page 178 of the Plan , point 2 of the policy refers to ...

"10 hectares of B1, B2 and B8 employment land and ancillary employment uses, to reflect the identified sectoral needs of the District and local area".

The combination of such uses is unlikely to lead to an employment density that will provide enough jobs to serve the needs of the new settlement.

It is noted that in the Stroud Employment Land Review, March 2021 it is acknowledged that the land has not been marketed yet and, in our view, this can only be an aspiration at present rather than a realistic, deliverable proposal. No evidence has been submitted to show that it is deliverable and it is also noted that the report authors (B.E. Group) recommend that evidence of deliverability be sought by the Council from the site promoters. In our view this evidence should have preceded the allocation of the site and not be sought after the event to justify its inclusion. Their assessment of the site's prospects for delivery are not encouraging - see PS36 in Table 35 on page 150 of the report (see <https://www.stroud.gov.uk/media/1484302/stroud-district-employment-land-review-2021.pdf>). The following is extracted from that Table:

Delivery/Management – A Knowledge Based business park would require a specialist developer to deliver, to market and to manage premises over the long term to maintain high standards. No such partner has been secured or is understood to have shown an interest at this time

Anchor Occupier – The two other specialist business park schemes proposed in the District, the Eco Park (Junction 13, M5) and the expansion of Renishaw New Mills, both have anchor occupiers secured, Ecotricity and the Renishaw linked company. These businesses will take up a high proportion of the space, ensure development occurs and attract other occupiers from their supply chains/customer base to the sites. At Quedgeley and Stonehouse development will build on an extensive critical mass of existing businesses. However, no equivalent anchor exists at Sharpness and existing companies at Sharpness Dock are unrelated to those which might be accommodated at the Knowledge Park.

The most likely alternative to the Knowledge Park would be a traditional development of B1/B2/B8 industrial and warehousing, building on the established cluster of the Docks/Severn Distribution Park, reflecting local demand while also meeting the needs of the new households of the Sharpness Eco Settlement. The most likely need would be for modern smaller industrial units to compliment the older stock and larger premises which already exists locally and allow those who are, or would be, home-working in the area to expand into premises.

More locally in Stroud District the SGS/Berkeley Green Technology Centre which plans itself to expand on the brownfield site of the former Berkeley Nuclear Power station. This site remains relatively remote and has found difficulty in attracting new businesses. The scope for major employment on the site is limited and it remains difficult to access. There is no direct access to the site from the proposed new settlement and vehicles servicing the site have to pass through the historic centre of Berkeley or negotiate narrow country lanes. It is also noted that an Eco-Park is allocated in the Local Plan on land at Junction 13 of M5. This is more likely to act as the natural employment growth hub for the District. It has the backing of Ecotricity as a major partner and is anticipated to provide up to 4,000 jobs when complete - something 10 hectares of relatively remote employment land at Sharpness could never achieve.

The allocation of 10 hectares of employment land in the Sharpness new settlement will not achieve the number of employment opportunities required by the existing population of the area to make it more self contained, let alone a new population of around 5,700 people by 2040 ... or 12,500 by 2050. In addition, rather than high density employment uses that it is proposed to attract, (as in knowledge based industries), we believe the site would be more likely to attract general industrial and warehousing uses which traditionally brings a very limited number of jobs per unit as is the case for the current units in the Sharpness/Docks area.

There is no established commercial developer/promoter associated with the PS36. This development - the largest proposed in the Local Plan - is led by a partnership between Greensquare Group and Lioncourt Strategic Land both of whom are relatively new companies that focus in residential housing development. It is obvious from perusal of their websites that neither has any established track record in delivering commercial developments and there is no commercial developer involved in promoting this development. This is seen as a major shortcoming to establish the viability of the proposed scheme.

With no major commercial developer / employer on-board as part of the plan and no significant employment prospects, any new residents would also be commuting along with the majority of the existing population of the Sharpness/Berkeley area. This will be adding to the congestion at Junctions 13 and 14 of M5 which is a known issue (even prior to the current developments at Falfield, Charfield and Thornbury being completed), as well as the need to connect via the A38 where the final section of the bypass (B4066/Alkington Lane) has never been completed.

Area of concern: The Environment and Surroundings

1. Efficient use of land

The choice of PS36 as a site is not compliant with prioritising the use of brownfield land or SDC commitment to build with the environment in mind. With regard to the key Issue identified on page 12 of the Pre-Submission Local Plan - "*Maximising the potential of brownfield and underused sites to contribute to housing supply ...*" it is worth noting that only 6% of the housing site allocations are made on brownfield land and the allocation of PS36 is entirely on productive Greenfield agricultural land.

PS36 and the other 4 sites destined to be built on in the Berkeley/Sharpness area cover more than 1,000 acres of greenfields. This large area currently has the potential to provide a range of supporting functions to the estuary and its designated interest features. There is potential risk of sterilisation or loss of functionally linked land for birds, other animals, mammals such as bats and fish.

These green fields, trees and hedges are required by our planet to absorb CO₂ in the face of rising levels of CO₂. Building 2,400 at PS36, plus 300 at PS34, represents an increase of 444% to the number of houses currently within 1 km of Sharpness. The proposal is to build double the number of houses than currently exist within 5 km before 2040. Despite this there is a lack of assessment on the impact on the environment.

2. Biodiversity/geodiversity

A significant negative effect is expected in relation to SDC's objectives regarding biodiversity/geodiversity. Development of the new settlement in Sharpness is in close proximity of the Severn Estuary Site of Specialist Scientific Interest (SSSI), Special Area of Conservation, Special Area of Protection and Ramsar site. There is a body of evidence that increasing levels of development can have a negative impact on grasslands, heathlands, woodlands, estuarine and coastal sites.

Further work is needed to establish the extent and nature of the impacts, and their combined effects on the site, and then what avoidance and mitigation measures may be possible, and how they can be justified and supported by evidence. Para 5.49 of the SA, May 2021 supports this view. In addition, the Severn Estuary Mitigation Strategy was adopted by Stroud District Council in December 2017 - pre-dating the development of the Local Plan Review. We have seen no evidence that the extensive development proposals now contained in the Plan have been addressed by an update to that Strategy, which was based upon the development proposals contained in the 2015 Local Plan. The update report (see <https://www.stroud.gov.uk/media/1411223/item-7-severn-estuary-recreation-mitigation-strategy.pdf>) to SDC's Environment Committee on 3 Dec 2020 makes no reference to the extensive new development proposals of this Local Plan Review.

The SSSI extends down the mud flats of the River Severn as far as Thornbury, and this area should be included in due consideration of the plan's soundness.

The internationally important Slimbridge Wetland Centre is about a mile away. The light and noise pollution that this town would generate raises concern with regard to the potential disturbance and damage to local wildlife and birds flying to the Slimbridge Wetland Centre.

We await more assessment of the impact on the Severn Estuary of the potential increase in recreational use, already evident (as witnessed by the need for the Mitigation Strategy drawn up in 2017) and leading to disturbance of this European site. This is particularly relevant as there are few other open spaces or recreational facilities nearby. Ground nesting birds might be particularly affected from recreational activity intrusion by residents and domestic pets of dwellings at PS34 and PS36.

3. Air quality

The current wording of PS36 makes explicit reference to a new railway station and rapid bus services to the nearest main settlements. It is disingenuous of SDC to present the Plan as if the rail link from Sharpness is a given. Similarly, the SA, May 2021 scores PS36 against air quality as if modal shift measures **will** be implemented. However, neither Stagecoach, that provides local bus services, nor Network Rail have set out plans to either endorse or provide these services. On the contrary, Stagecoach states that they have no plans to add to public transport regardless of development and that they would be astonished if Network rail were to open a halt. Even if a station were to be built the line to Bristol no longer exists and, therefore, people commuting to work in Bristol will most likely use their car. Air quality will suffer through CO2 emissions from vehicles using petrol or diesel as fuel. This in an area where green fields are built upon and therefore without capacity for uptake of CO2.

Network Rail have no immediate plans to build a rail halt at Sharpness. If they were to do so, it would require additional improvements at the Cam & Dursley station and trains could only travel northward, when 74% of residents commute southward to work in Bristol.

PS36 site is at the maximum distance from all large centres of employment in the county, inevitably making driving the preferred means of transport. Assumptions about local employment are made by allowing 10 HA of land at PS36 despite Sharpness having been deemed too rural by employers for the past 30 years.

Emissions from construction traffic would be significant given the remoteness of the location and be long lasting, over a period of 30 years. Regardless of any alternative for passengers to avoid travelling by road there would be 3 decades when all building deliveries come in by road, and that would be in the context of loss of the original green fields to take up the additional CO2 generated by this traffic.

4. Water drainage, quality & waste

The site includes areas described as having a high probability of flooding. Nearby the PS33 site includes land which is prone to flooding and could exacerbate flooding in PS36. Over time there will be an increase in water coming down the Severn from Wales as a consequence of higher rainfall.

Additional housing is likely to require additional defences as flood mitigation. Any increase in hard engineering solutions that negatively impacts the ecology of the estuary would be unacceptable and unsustainable given the predicted effects of climate change.

The issue of drainage of surface water and sewage are relevant to PS36. Severn Trent Water state that the Berkeley and Sharpness sites, PS33-PS36 are out of their area. Wessex Water have concerns in their feedback about the plan and say that they have no plans to improve sewerage treatment works that would be required to service the development at Sharpness.

There are potential pathways that could impact on the PS36 site in terms of water quality and water abstraction due to its proximity to the estuary.

The Sustainability Assessment of April 2021 (from SDC) does not present any evidence that answers questions previously raised about the risk from flooding in PS36.

This is not consistent with the Government's National Planning Policy 'to reduce the risk from coastal change by avoiding inappropriate developments in vulnerable areas or adding to the impacts of physical changes to the coast'.

5. Landscapes/townscape

The Berkeley Vale in which PS36 is proposed to sit is not in an AONB but when viewed from the AONB's of the Cotswold escarpment or the Forest of Dean it is attractive, undulating farmland crisscrossed with hedges. Views are extensive into the area and this proposal would be a scar both within the Vale and upon the setting of those AONBs.

We understand that we are now allowed by the planning system to promote 'beauty' as a requirement of our environment. It is one of the reasons so many people wish to live in our area. This currently provides local residents with positive elements that support well-being. We consider it imperative that we protect this beauty.

This new settlement proposal falls within the "Sandstone Ridge" landscape character type described in the Stroud Landscape Character Assessment (Nov 2000), (see https://www.stroud.gov.uk/media/1392/landscape_assessment.pdf). The extracts below highlight the sensitivity of this landscape...

“Human Response

The distinctive ridge topography, influence of the Sharpness docks and the older historic associations of Berkeley make this landscape rather unusual and distinctive from other areas within the Stroud District, having a strong sense of place and local identity.

Predominantly rural in character with the exception of the area around the docks, this landscape is generally unspoiled, although pylons and inappropriate housing development detract from its quality in places.

Sensitivity to Change

This is a sensitive landscape, visible across a wide area from within Stroud District and from the other side of the Severn estuary, and new development therefore needs to be considered carefully. Development pressures are likely to be high around settlements, with possible encroachment into open countryside and extending linear development along roads, resulting in the connecting of individual settlements. The main threat arises from unsympathetic design and new development should respond to the local vernacular, scale and grain, helping to retain the difference between the Sharpness settlements and the more rural villages such as Purton. Road widening and improvements have already been carried out around Berkeley. Further improvements should carefully consider the rural character of this landscape. The well wooded nature of this landscape is an important characteristic brought about by the large number of hedges and hedgerow trees. The landscape is therefore sensitive to continued woodland and hedgerow management retaining a balance of clipped hedges and areas of hedgerow trees.”

As well as the 2,400 houses proposed at PS36 there are 550 proposed at the other 4 sites in the area. There are potentially 2,950 dwellings proposed to be built in Berkeley and Sharpness before 2040 rising to 5,550 dwellings by 2050. The new developments represent a 'step change' in terms of housing numbers and would in our opinion destroy the sensitive landscape of the area.

Current Local Plan policy also seeks to enhance the tourism potential of Berkeley and Sharpness. In denuding the current landscape and natural environment and bringing increased traffic into the area this development would have an adverse impact on that potential. The planned development will detract from Berkeley as an historic centre. As Berkeley is an important tourist centre with visitors to Berkeley Castle, Cattle Country Adventure Park, Edward Jenner Museum coming from all over the world bringing business to the town it is important that the town remains attractive and welcoming.

The proposed development between Berkeley and Sharpness is of such magnitude that it will lead to coalescence with Berkeley with Sharpness. In future phase 2 of the proposed development up to 2050 will lead to the further coalescence of Abwell, Wanswell, Newtown, Brookend and Hinton into the wider urban area generated. The separate identities and characters of all these small settlements will be overwhelmed and lost.

The delivery of the new settlement as a Garden Village is questionable and could attract further commuters from the Bristol area who have found Thornbury and its environs either difficult to find a house or difficult in price terms thus moving further north up the M5 Motorway. This is likely to negatively impact on the local population as house prices get forced up and there is less affordable availability for local residents to purchase homes.

Each transport infrastructure improvement required for development in this location may result in increased land take which would likely have further adverse effects in relation to landscapes/townscape.

Area of concern: Deliverability and construction

1. Capacity of PS36 to deliver

The Council's Strategic Assessment of Land Availability (SALA) 2017, Appendix 3 (<https://www.stroud.gov.uk/media/355588/appendix-3.pdf>), included in its 'Potential sites' the site NEW002 - land at Sharpness. It was assessed by the Council as having potential for 1,425 houses on 325.64ha gross. It noted the following: *'The site is being promoted for up to 5000 houses and 30ha employment but a detailed assessment would be required to confirm this figure'*

Where is the Council's objective assessment to confirm this figure? How has the figure proposed by the Sharpness Vale developers been accepted by the Council when it contradicts their own consideration? BaSRAG cannot find any document in the evidence base that supplies the Council's revised objective assessment or reasoning behind its decision making. It appears that promotional material has been submitted by the promoters of the site and this has simply been accepted by the Council without any objective reassessment.

2. Delivery rate

We query whether assumptions made in the Local Plan as to delivery rates of housing are realistic. We don't believe they are. We noted that amongst the Draft Plan representations a large number of other developers/site promoters and the Home Builders Federation(HBF) queried the housing trajectory contained in that version of the Plan.

For example, Pegasus Group (https://www.stroud.gov.uk/media/1165988/00493b-pegasus_robert-hitchins-ltd.pdf), stated *"It is noted that the housing trajectory in the Draft Local Plan anticipates 500 dwellings being delivered in the period 2025 to 2030 and in the subsequent five years a further 750 dwellings and in the final five years of the plan period, 1,150 dwellings. It is considered that this trajectory is unrealistic, it is widely acknowledged that although large sites can deliver more homes per year over a longer time period, they also have longer lead-in times."* The trajectory shown on page 306 of the Pre Submission plan has not changed from the Draft Plan version. It appears that all the concerns expressed about delivery rates have been dismissed or ignored.

The HBF (<https://www.stroud.gov.uk/media/1165752/00354-home-builders-federation.pdf>) who consider themselves subject matter experts, stated *'there are some delivery concerns relating to strategic sites in and around Sharpness'*.

Similarly, on behalf of a residential developer, Boyer Planning (https://www.stroud.gov.uk/media/1166011/00430-boyer-planning_redrow.pdf) stated, *"The delivery trajectory for Sharpness is not supported by any evidence to explain why the rates proposed accurately reflect the ability of this site to deliver. Such information is considered essential in terms of justifying the projected rate of delivery"*.

We have been made aware of the Nathaniel Lichfield report "Start to Finish, (https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf), that examined delivery rates on large housing developments. It identifies a number of factors that cause delay in delivering housing that are relevant to PS36. In its conclusions it states ... *"In too many local plans and 5YHLS cases, there is insufficient evidence for how large sites are treated in housing trajectories."* ... *"...there are a number of key questions to consider when estimating delivery on large housing sites, based around the three key elements in the three tier analytical framework at Figure 16."* There are many of the questions raised in that framework that are not satisfactorily answered by the evidence presented in relation to PS36 and we can only conclude that at best the trajectory in the Plan is aspirational rather than realistically deliverable.

3. Is PS36 'deliverable' as defined by NPPF?

Paragraph 76 of the National Planning Policy Framework considers housing deliverability in relation to the first five years of an adopted Local Plan. By the time this Plan is adopted, we believe the lead in times and delivery rates for the new settlement at PS36 as expressed in the trajectory will be proved unrealistic. The original timetable for the Plan is already running late and the earliest possible adoption will be in winter 2022. That eats into the first five years of the trajectory and thus in the first five years of the adopted Plan an element of the first 500 homes will need to be delivered to meet the requirements of maintaining a Five Year Housing Supply. We consider it highly unlikely the delivery rate will be achieved in the light of all the complications surrounding delivery of the site to garden village principles. The longer the delay in adopting this Local Plan, the the greater the likelihood that delivery will not be achieved to meet the Five Year Housing Supply requirement.

As referred to earlier, independent research (NLP, Start to Finish), suggests the delivery timetable for large sites is nearly always optimistic – in reality they are unlikely to provide delivery until at least 6-7 years into a plan period.

4. Location negatively impacts on delivery

Earlier in this representation we have pointed to the relatively isolated location of PS36, the limits of current infrastructure and facilities and the difficulties in bringing new infrastructure forward. This will have a negative impact on construction and development viability. The complexity of logistics and construction will have a programme delivery impact and slow the delivery rates of housing - if the

whole concept is deemed viable in the first place, which we doubt.

5. Reliance on housing on strategic sites

The Local Plan relies on major strategic sites to deliver the bulk of housing numbers for the district to 2040. Yet the capability of Stroud District Council achieving house build out rates on strategic sites is highly questionable. For example, the paragraph and table below are taken from the 2015 Local Plan with a column added to the table to show actual completions taken from the Stroud District Five Year Housing Supply October 2020 Appendix 9. The cells highlighted in yellow indicate the expected delivery in first five years of the Plan from 2015. The cells highlighted in pink indicate the actual delivery as reported at 1 April 2020. Only 179 dwellings were completed on strategic sites in the first five years of the Plan out of an anticipated 912 dwellings.

“The following table sets out when the strategic housing allocations set out in the Local Plan are anticipated to be delivered. Whilst existing commitments (planning permissions) will contribute significantly to meeting the housing needs during the first five years of the plan, it will be important to plan for the strategic sites in the short term as larger sites take time to masterplan and come on stream, especially where significant infrastructure is required.”

Source of Housing Supply	2006 to 2015	Projected Delivery of Allocations 2015 - 2031			Total Supply	Completions (April 2020)
		1 - 5 years	6 - 10 years	11 - 15+ years		
Completions	3,837				3,837	
Commitments (2015)					3,948	
Undeliverable permissions (2015)					- 449	
Stroud Valleys		170	260	20	450	0
West of Stonehouse		350	850	150	1,350	176
North East Cam		180	270		450	3
Hunts Grove Extension		132	579	39	750	0
Sharpness Docks North		80	116	104	300	0
Small sites windfall		115	290	345	750	
Council housing programme		109	41	0	150	
	3,837	1136	2,406	658	11,536	

Stroud District Council recognised these problems itself in its 2019 Housing Delivery Test Action Plan (<https://www.stroud.gov.uk/media/1070713/housing-delivery-action-plan-2019.pdf>) in which at para 2.6 it stated

“Lower than required delivery rates in the two year period 2015 – 2017 are attributable to delays to programmed delivery at major development sites at Littlecombe, Dursley and Hunts Grove, Hardwicke, due to infrastructure requirements, and detailed planning

permission outstanding at Local Plan allocation sites at SA2: Land west of Stonehouse and SA3: NE Cam.”

The problems have not been resolved as yet and delivery on strategic sites is well below the 2015 anticipated rates. There is nothing in the proposed Local Plan to counter this issue.

Sustainability could be compromised by the Plan's over reliance on strategic sites coming forward. It further places an inherent delivery pressure on site PS36 with no additional support for any shortfall.

6. Reliance of PS36 on the capability of the site proposer

For evidence, Stroud District Council appears to place reliance for justification of PS36 as a strategic site on Sharpness Vale LLP as the developer. However, we query whether the development proposition is reasonable. Promotional material, bids to the Garden Communities Programme and to the Restoring Your Railways Fund are full of aspirational material but very low on hard evidence to justify this development. It is promoted by two residential developers/providers: Green Square Group and Lioncourt Strategic Land.

Green Square owned and managed 12,000 homes prior to April 2021 when they merged with the similarly sized Accord Housing Association. Building at PS36 represents a significant increase to their portfolio. Where is the evidence to demonstrate their capacity and capability to deliver a scheme of this size? What is their track record of delivering new homes on a major development such as PS36. Viewing their website gives no impression of their ability to construct and deliver new homes. Their growth as a company appears to have mainly come about by mergers and acquisition rather ability to build large numbers of new homes on major strategic sites.

Lioncourt Strategic *“mainly enter into promotion agreements to promote sites through the planning system. Following grant of planning permission we jointly dispose of the land to the open market, using the landowner's agent where appropriate. This ensures the best price is achieved for both the landowner and Lioncourt in a transparent and arms-length transaction.”* (Source <https://lioncourtstrategic.com/about-us/>).

They currently claim to have a *“strategic land portfolio to deliver in excess of 6500 homes”*. However that portfolio includes PS36 and only one other site of a similar magnitude which they say has negotiated the planning system to receive permission for 2,500 homes in Warwickshire.

In our view this is hardly a track record of successful delivery to this scale. Their hope presumably, as the quote above suggests, is to get through the planning system and then dispose of the land to actual developers. We have not been made aware of any major house builder or commercial developer that is signed up to this development and can provide a track record for delivering such an ambitious scheme especially in terms of the optimistic timescale required by the Local Plan..

7. Viability of PS36

This proposal will have higher than normal infrastructure costs if it is to be actually delivered to the

Garden Village principles espoused. This is due partly to the higher demands to meet criteria for sustainability in garden villages; partly because of the very low starting point in terms of existing infrastructure in the area; partly due to the extent of and high costs for the infrastructure provision that is necessary; partly due to the very remoteness and isolation of this site from major employment, services and facilities relating to education, leisure , health.

We have outlined above our concerns regarding many aspects of infrastructure, transport, employment and environmental factors. These lead us to the view that this development is not sustainable. It is unlikely to be viable. It will not be deliverable within the timeframe proposed in the Local Plan. There has been virtually no community engagement through the process to date and there is very little if any community support for it. We therefore respectfully ask the Inspector(s) to reject this proposal and seek to install one of the other more sustainable options for meeting Stroud's housing needs to 2040 and beyond.

BaSRAG Response to Stroud District Council Local Plan Review June/July 2021

Objection to site allocation PS36 Sharpness new settlement

Annexes

1. Process Timeline
2. Precedent
3. Letter from Inspectors in relation to Uttlesford District Council Local Plan examination
4. FOI response received in relation to the Garden Communities programme and the application related to Sharpness Garden Village
5. BaSRAG response to the Additional Housing Consultation stage
6. BaSRAG response to the Draft Local Plan Consultation stage

BaSRAG Response to Stroud District Council Local Plan Review June/July 2021

Objection to site allocation PS36 Sharpness new settlement

Annexes

Annex 1 Process Timeline

BaSRAG Response to Stroud District Council Local Plan Review June/July 2021

Process - Timeline of issues leading to democratic deficit

2017 - Autumn		<p>Issues and Options Stage: 4 options Option 1: Continue to concentrate housing and employment development at a few large sites, located adjacent to the main towns in the District Option 2: Take a more dispersed approach with some medium sized housing and employment sites on the edge of the larger villages, as well as towns Option 3: Disperse development across the District with most villages including at least one small to medium site allocated to meet local needs Option 4: Identify a growth point in the District to include significant growth, either as an expansion of an existing settlement, or to create a new settlement</p>
	Issue 1	All options were presented and considered in isolation. The 'hybrid' strategy which eventually emerged was not offered for comment and no commentary provided upon its selection and suitability.
	Issue 2	The single consultation event in Berkeley and Sharpness area for the Issues and Options stage was between 3pm and 6.30pm on Thursday 2 November 2017 in Berkeley, with limited advanced publicity. There were no provisions made at this key stage for people who were working at that time or for those living in Sharpness, Newtown and surrounding villages (who will be hugely affected by these plans).
2018 - Autumn	Issue 3	Emerging Strategy Stage: Allocated Sharpness as 'Growth Point' within a hybrid strategy. Little discussion of how the 'hybrid' strategy was arrived at, and lack of comparative Sustainability Appraisals against the original 4 main options.
	Issue 4	Instead of progressing the Plan as is normal through Issues and Options > Preferred Strategy > Draft Plan, they went from Issues Options > Emerging Strategy > Draft Plan However, The Councillors specifically approved an 'emerging strategy' and did not approve the consultation as the Preferred Strategy because they had reservations about it. Hence the Council have missed out the normal Preferred Strategy stage which is supposed to inform and give certainty to the public of the Council's strategy position. It would appear that an opportunity for consultation and engagement on the Preferred Strategy was omitted.
	Issue 5	Confusing online questionnaire at the Emerging Strategy stage seems designed more to create statistics and drive residents down a preferred route to support the planners' case, rather than give them an open opportunity to express their views.
2019 - Autumn/ winter	Issue 6	Since two meetings with BaSRAG in the autumn of 2019, recognising them as a community group and promising regular updates and consultation, the District Council appears to have dropped all proactive communications and have only given out information when chased. Even routine advice of the Plan moving through the process has not been received.
	Issue 7	Draft Local Plan stage: Hybrid strategy continues and Sharpness now refers to Phase 2 for 5,000 homes total. It is unclear in presentation of the site PS36, whether aspirations, policies and outcomes relate only to the plan period or cover the entirety of phases 1 and 2.
	Issue 8	The Draft Local Plan stage is weak in its evidence base (as commented upon by local residents, statutory consultees and interested groups). No Infrastructure Development Plan; no consideration of education facilities; HRA has little detail - at this late stage the evidence base is not sufficiently developed to suggest the sites are following the evidence and assessments made.
	Issue 9	Despite significant public interest and an appetite for engagement the council did not arrange a roadshow for Berkeley – despite a significant proportion of the overall Plan being built on its doorstep – until BaSRAG complained. This turned out to be the roadshow with the greatest attendance in the district.
2020 - Autumn	Issue 10	Additional Housing Options stage: potential need to find additional housing sites triggered a review of strategy and site options in the Additional Housing Options paper (Autumn 2020) However none of these sites were considered as alternatives to the proposed allocations. Inconsistent with previous stages where <i>'Further potential sites that were promoted through the Emerging Strategy and Draft Local Plan stages have also been subject to assessment, to determine whether they have potential to contribute to the proposed development strategy.'</i> (Para 2.3 'Testing the Options' of the pre-submission Draft Local Plan)
	Issue 11	Diagrams in the Additional Housing Options consultation show clearly the railway line from Sharpness, as if its existence was definite, and upon which judgements in that consultation could be made.

2021 - April / May	Issue 12	Pre-submission draft local plan stage: The Pre-submission draft was taken to Environment Committee on 20 April without updated HRA. Environment Committee was invited to make a decision and recommend a significant piece of policy during a pre-election (purdah) period. The papers included outputs from an earlier round of consultation that had not previously been made public.
	Issue 13	Pre-submission draft local plan taken to Full Council on 29 April without updated HRA Full Council invited to make a decision, leading to the commencement of a new consultation, during a pre-election (purdah) period.
	Issue 14	At the Pre-Submission Draft Plan (Regulation19) consultation (commencing 26 May), residents only given the option of completing a lengthy online questionnaire or a technical Word document. The draft version of this consultation document voted on by the council stated clearly there would be no questionnaire and that residents could engage by letter or email. This was removed from the final document but only after it had been passed by the Council.
	Issue 15	The Council website advised residents that if the response methods were not suitable for them, they should phone the council 'hotline'. When doing so, they received a message urging them to email but if they must leave a voicemail the council would endeavour to respond within 48 hours. This deters people from responding.
	Issue 16	The Pre-submission draft local plan was published on SDC website to commence Regulation 19 consultation, however not all Local Plan evidence base documents were published simultaneously. The actions of the Council contravenes the The Town and Country Planning (Local Planning) (England) Regulations 2012 (Regs 17, 19 & 35) and the Council's own Statement of Representation Procedure which indicates all supporting documents are available at its publication on 26th May. The Statement of Representations should only be made 'available' when each of the proposed submission document is also 'available', therefore starting the clock for submissions.
2021 - 16-Jun	Issue 17	Stroud District Council extend the consultation response deadline to 21st July 2021, however the Statement of Representation Procedure is not updated, remaining factually incorrect and stating responses should be submitted by 7th July.
	Issue 18	The Pre-Submission Draft Local Plan consultation is due to last eight weeks. The LGA recommends consultation periods last between eight and 12 weeks. The maximum amount of time should have been allocated for this consultation because it is an important stage of the Local Plan review process. This would allow people to study the latest version of the plan, consider its implications for their local area and to make a better informed response.

BaSRAG Response to Stroud District Council Local Plan Review June/July 2021

Objection to site allocation PS36 Sharpness new settlement

Annexes

Annex 2 Precedent

Annexe to response in relation to PS36

While all Local Plans are developed in response to the needs of their area, they are subject to the same levels of scrutiny via the submission for Inspection and Examination against the National Planning Policy Framework.

As local plans will look to address the housing, education, infrastructure, employment, transport and community needs of their areas, similar strategic approaches are utilised and parallels can be drawn to other plans submitted for inspection.

The tests in relation to soundness have been applied against Local Plan submissions across England and we would argue that previous decisions and recommendations made by members of the Planning Inspectorate in their own assessments offer insight into similar deficiencies of the pre-submission Draft Local Plan and its suitability for adoption.

As outlined elsewhere in our response we believe the pre-submission Draft Local Plan fails to meet the soundness test in relation to the criteria of 'positively prepared', 'justified' or 'effective'.

Precedent

(1) Process of selection of strategic sites

The process of selection of strategic locations should be evidence base > strategy > location selection. The absence of a complete evidence base for PS36 (even at Local Plan submission stage) show this not to be the case.

The Inspectors of the West of England Combined Authority Joint Spatial Plan said *'the evidence base failed to satisfactorily justify the identified locations for strategic development'* – one of their reasons to recommend the plan be withdrawn.

(2) Evidence base does not inform plan

'Proposed supporting information' continues to be made available at a late stage, including after the publication of the Statement of Representation Procedure. These documents are identified by Stroud District Council as the 'Local Plan Evidence Base'.

As these are evidence base documents they should have *informed* the plan making process rather than *follow* it.

The Inspectors of the Uttlesford District Council Local Plan recommended the plan be withdrawn, as there was a *'risk that the material seeks to justify the strategy rather than inform plan making.'*

(3) Sustainability appraisals across the Plan

As outlined in our response to relation to paragraph 1.0.18 of the proposed Local Plan we consider there to be inconsistency of assessment method and disparity in scoring to historic appraisals.

The Inspectors of the West of England Combined Authority Joint Spatial Plan recommended the plan be withdrawn as alternative locations had not been assessed *'on a robust, consistent and objective basis'*.

(4) Sustainability appraisal in relation to PS36

The sustainability appraisal in respect of PS36 is based on the deliverability and inclusion of future infrastructure development, which is inconsistent with other appraisals.

The Inspectors of the Uttlesford District Council Local Plan questioned just such an assessment strategy and expressed concerns about its robustness.

(5) Transport solution – sustainability

As outlined elsewhere in our response we do not believe the transport solution proposed by the Developers for PS36 capable of delivering a sustainable solution. The solution is primarily based around commuting and doesn't adequately consider other scenarios.

The Inspector of the Uttlesford District Council Local Plan was highly critical of the transport solution in their recommendation for withdrawal noting *'to meet the needs other than employment, the future residents... would be without the sustainable transport options offered.'*

(6) Transport solution – deliverability

Even at pre-submission stage we have yet to be presented with an evidence base in relation to the transport solution proposed for PS36. The first Restoring your Railways Ideas Fund application was unsuccessful (the second is currently being considered) and Stagecoach, one of the largest providers of bus and train services in the UK, considers the transport plan to be unviable. PS36's sustainability is in large part predicated on the transport solution yet there is an absence of evidence of certainty of deliverability.

The Inspectors of the Uttlesford District Council Local Plan recommended the plan be withdrawn for reasons including that the evidence did not show *'the level of detail sufficient to show that [the transport solution] is practical in principle.'*

(7) Strategic development via Garden Communities

Fundamentally we do not believe the plan to be deliverable.

It is not clear from the drafting of the plan and the allocations made therein that Stroud District Council has appreciated the complexity and challenging nature of delivering a significant proportion of housing numbers via garden communities in concurrent developments.

There are likely to be delays – in fact the majority of existing housing build-out delay in Stroud is via large, strategic sites (as detailed in our response to PS36). We believe that the plan does not meet the test of soundness in relation to compliance with the National Planning Policy Framework or ‘effectiveness’ as, while aspirational, it is critically not deliverable.

The Inspectors of the Uttlesford District Council Local Plan strongly believed that the numbers projected in their area would not be delivered by the garden communities proposed and therefore housing requirement would not be met.

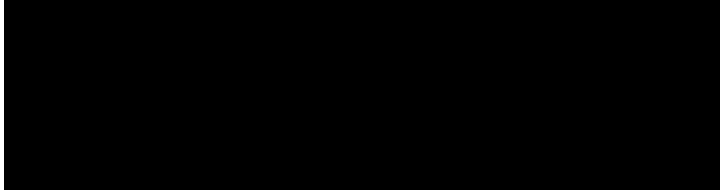
BaSRAG Response to Stroud District Council Local Plan Review June/July 2021

Objection to site allocation PS36 Sharpness new settlement

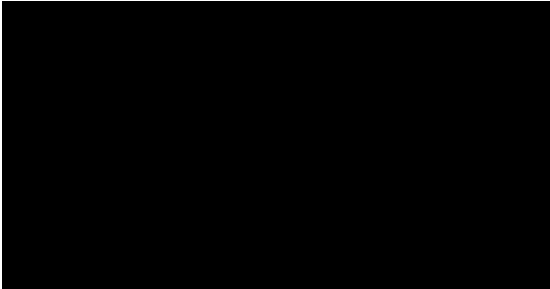
Annexes

Annex 3 Letter from Inspectors in relation to Uttlesford District Council Local Plan examination

Uttlesford District Council Local Plan Examination
Inspector Louise Crosby MA MRTPI
Inspector Elaine Worthington BA (Hons) MT MUED MRTPI



10 January 2020



By email only

Dear M 

EXAMINATION OF THE UTTLESFORD LOCAL PLAN

Introduction

1. Stage 1 hearing sessions were held between 2nd and 18th July 2019. We heard a great deal of evidence, some of which has required further formal targeted consultation and hence why it has taken us some time to fully consider everything put to us and to formally respond. This letter describes our findings in relation to several key matters and the plan's soundness.
2. Unfortunately, despite the additional evidence that has been submitted during the examination and all that we have now read and heard in the examination, including the suggested main modifications to the plan (ED41) put forward by the Council, we have significant concerns in relation to the soundness of the plan. In particular, we are not persuaded that there is sufficient evidence to demonstrate that the Garden Communities, and thus the overall spatial strategy, have been justified. We therefore cannot conclude that these fundamental aspects of the plan are sound.
3. It is not the intention of this letter to cover every matter that was discussed at the hearing sessions. Our letter focuses on those aspects of the plan and its evidence base which we do not consider to be justified. It also advises on specific changes that would be needed to some of the plan's policies. More detailed matters, and aspects of the plan that would not require significant further work at this stage or have not been subject to hearings sessions, are not dealt with here.

4. Also, we have not taken account of examination documents received after ED76 (October 2019), in this letter since there has come a point where we have had to draw a line under new documents submitted by the Council, not only so we could finalise this letter and thus ensure the examination is dealt with in an expeditious manner, but also because these documents have not been consulted upon and were not requested by us.
5. To clarify, the plan is being examined under the transitional arrangements set out in Annex 1 to the revised National Planning Policy Framework (the Framework) 2019. As such, the policies in the previous version of the Framework published in 2012 (and the associated version of the Planning Practice Guidance (the Guidance)) continue to apply. References in this letter to the Framework and the Guidance are therefore to those previous versions.

Proposed Garden Communities in General

Introduction

6. The Framework acknowledges that *'the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities local planning authorities should consider whether such opportunities provide the best way achieving sustainable development'* (paragraph 52).
7. The plan contains three Garden Communities which are known as, Easton Park, North Uttlesford and West of Braintree. They are relied upon for the delivery of much of the new housing in the remainder of the plan period, and well beyond. In total they are expected to deliver around 18,500 new market and affordable homes.
8. In general terms we are concerned about the lack of evidence before us to enable us to conclude these parts of the plan are sound. Whilst we realise it is the Council's intention to lay down much of the detail of the proposed Garden Communities in further Development Plan Documents (DPDs), following the adoption of the plan, it is this examination which must determine whether the Garden Community proposals are properly justified and realistically developable. This is of major importance in this case given the large scale and long-term nature of the Garden Community developments, combined with the fact that they would be the primary source of housing in the district for the next 30 to 40 years.

Spatial Strategy and Sustainability Appraisal

9. We are concerned that all the reasonable alternatives tested in the Sustainability Appraisal (2018) (SA), included all three Garden Communities with varying degrees of other development, except one (option 3) which included no Garden Communities. No testing was carried out with say two Garden Communities, along with other development at existing settlements. This potential shortcoming of the SA is acknowledged in paragraph 8.165, but there is no explanation as to why such a scenario was not tested. This is a serious omission and has, in part, led to

fundamental problems with the overall spatial strategy which we set out later in our letter.

10. Also, in the 'Appraisal findings for the spatial strategy options' section of the SA (pages 431-448), option 1 (preferred option that is the submitted plan strategy) and option 2a (less development at Garden Communities and more at towns/villages (with a train station)) score equally in all of the 15 SA objectives. However, this was undertaken before the Council's Heritage Impact Assessment (HIA) (Donald Insall Associates January 2019) was published, albeit Historic England had raised objections to the North Uttlesford Garden Community at that stage.
11. In addition, SA objective 9 (to promote and encourage the use of sustainable methods of travel) testing was undertaken on the understanding that Easton Park and West of Braintree would provide a new Rapid Transit System (RTS) which would be delivered in phases alongside housing, employment and other infrastructure. Later in our letter we question whether a RTS would be delivered in the early years of the Garden Community developments. This adds to our concerns about the robustness of the SA.

Garden City Principles

12. The plan at paragraph 3.78 and in Policy SP5, sets out the Garden City Principles developed by the Town and Country Planning Association and advises that the Garden Communities will be developed in accordance with them. We share the Council's view that it is reasonable that these principles should be key pillars in the development of the Garden Communities in Uttlesford. Principle 1 concerns land value capture for the benefit of the community. Strong vision, leadership and community engagement are identified in Principle 2. Principle 3 expects community ownership of land and long-term stewardship of assets. However, the mechanisms by which these guiding principles will be delivered and ensured are not readily evident in the plan.
13. During discussions at the hearings it was suggested by one of the site promoters (West of Braintree) that land value capture for the community would not be realised. Additionally, the site promoter at Easton Park questions the need for a Quality and Collaboration Partnership (QCP), as set out in the Council's Focused Change 4 to Policy SP5. This objection is sustained in ED66 (Statement of Common Ground between the Council and Landsec).
14. We understand that the Council has introduced the QCP as a mechanism to ensure that the public and private sectors can together deliver strategic growth over several plan periods, and still ensure that the fundamental Garden City Principles (such as community engagement, long term stewardship, and to ensure that a holistic approach can be assured) are adhered to. The site promoter at Easton Park considers the QCP to be unnecessary and to replicate the planning system. Additionally, they cannot agree with the Council what the QCP will do (if it is to be accepted as a concept).

15. Furthermore, whilst it is understood that the Delivery Board for North Uttlesford has already been established, ED66 also highlights disagreement between the Council and the site promoter at Easton Park in relation to the terms of the Delivery Board that will oversee the plan making, delivery and implementation of that Garden Community. All these matters cast some doubt as to whether these vital Garden Community Principles would be met in Uttlesford. Without assurances that the necessary mechanisms outside the plan would be put in place, we cannot be content in principle that the new proposed settlements would be true Garden Communities, or that the plan's stated vision for these new settlements would be met. This is a serious concern.

Policies Map

16. The broad locations for the three Garden Communities are shown on the Policies Map and each is intended to be the subject of a detailed DPD which would determine, among other things, the full extent of the land required and the nature and form of the new communities. Nevertheless, Policies SP5, SP6, SP7 and SP8 set out the principles for the development for the Garden Communities along with a number of site-specific requirements.
17. We are concerned that the boundaries of the Garden Community site allocations are not shown on the Policies Map. This is not a matter to be left to DPDs. We cannot find the plan sound based on vague blurred annotations of broad locations, especially for something as significant as three large new communities. Indeed, The Town and Country Planning (Local Planning) (England) Regulations 2012, require that the adopted plan contains a Policies Map that illustrates geographically the application of the policies in the adopted development plan. The site boundary lines would need clearly defining on the Policies Map and need to include land to be safeguarded for transport and any other infrastructure.

Delivery of Market and Affordable Housing

18. The housing requirement for Uttlesford for the whole of the plan period (2011 to 2033) is 14,000 net additional homes. The quantum of new homes expected to be delivered in the remainder of the plan period (up to 2033) in the Garden Communities was proposed by the Council to be reduced from 4820 to 4190 during the stage 1 hearing sessions through a revised housing trajectory (ED51). This is against an overall requirement in those 10 years (2023/24 to 2032/33) for 7190 dwellings. In addition, changes to the anticipated start dates have occurred with delivery in Easton Park and North Uttlesford being pushed on by one year from 2022/23 to 2023/24 and some of the yearly delivery rates have also been amended. Our comments in this letter are based on this revised housing trajectory.
19. The Garden Community site allocations are for a very significant number of homes, over a considerable period, and all three would be developed more or less simultaneously. This would bring about a substantial amount of development and consequential change over a long timescale. Development of this scale and timing on three large sites in one essentially rural district is highly aspirational and ambitious. As such, it is vital that the Garden Communities are justified and deliverable. The Framework indicates that '*Local Plans should be aspirational but realistic*' (paragraph

154) and one of the key tests of soundness is that the plan should be effective, that it is, *'deliverable over its period and based on effective joint working on cross boundary strategic priorities'* (paragraph 182).

20. The latest housing trajectory relies on commencement dates in relation to Garden Communities in North Uttlesford and Easton Park, which we consider to be extremely optimistic considering the current timetable for the adoption of the plan and the overly ambitious timescales for the production and adoption of the DPDs (and the submission and approval of planning applications for the Garden Communities).
21. The Council has provided an update on the timelines for the production of the DPDs for Easton Park and North Uttlesford in Appendix 1 to ED30. This indicates that work on the preparation of the DPDs commenced in June 2019 and we acknowledge that the Council has appointed three members of staff to work on them. However, the update shows that despite consultations being timetabled with the Community Forums for July 2019, appointments to the Local Delivery Boards and the setting up of the Community Forums were yet to be completed at this point.
22. No indication as to how long this might take is given. Whilst ED71 provides a further progress report and indicates that members of the Community Forums have been identified, meetings have not yet been held. Thus, there is already some evidence of slippage in the timetable and the missing of key milestones. Bearing in mind the other subsequent stages set out in the timetable (including the Council's own three stage approval process), it is difficult to see how public consultation on the DPDs would realistically commence early in January 2020 as anticipated.
23. The proposed trajectory is even more optimistic if the promoters of the Garden Communities do not intend to submit planning applications until the DPDs have been adopted (as indicated by the promoter for Easton Park). The Council's timetable assumes promoters would twin track outline planning applications alongside the DPD preparation and examination process.
24. Although we note the North Uttlesford site promoter's willingness to prepare an outline planning application alongside the DPD, we share the Easton Park site promoter's reservations about how such an arrangement would work in practice. This is particularly so given the considerable amount of detail (including, as things stand, the defined site boundaries) that is to be left to the DPDs and the high level of uncertainty, potential wasted expense and associated risks that would be involved without the comfort of advancing a planning application which is in line with an adopted DPD.
25. The promoters of Easton Park have confirmed that they envisage first completions in around September 2025, approximately 2 years after the Council's estimate of 2023/24. All these factors point to the timetable not being realistic. Indeed, there seems to be a lack of recognition on the Council's part as to how complex and challenging it would be to deliver the

three Garden Communities and a lack of appreciation as to the delays that are very likely to occur.

26. The promoters of Easton Park argue for the details of the Garden Communities to be dealt with by Supplementary Planning Documents (SPDs) rather than DPDs, to speed up the process. However, since SPDs cannot set policies and are not subject to independent examination, proceeding down the route of SPDs would require the plan to contain far more detail than it does at present. Additionally, SPDs carry less weight in future decision making as they are not part of the development plan. With something so fundamental as large new Garden Communities it is our firm view that the key details need to be committed to DPDs which would be examined and adopted.
27. Overall, we strongly believe that the Garden Communities will not deliver the quantum of housing in the plan period that the Council's housing trajectory shows. Consequently, the housing requirement for the plan period would not be met.
28. Turning to consider the 5-year HLS situation, the revised housing trajectory (ED51) shows that the Council would have a 5.10 year HLS on adoption of the plan, based on a stepped trajectory and including a windfall allowance and two of the Garden Communities delivering houses in 2023/24. This has since been updated in ED73, a document entitled *Housing Trajectory and 5 year land supply statement 1 April 2019* (published October 2019). In this document, Table 6 shows a 5 year HLS calculation, taking account of the emerging plan and factors in the 'oversupply' of housing against the plan target since 2011/12 (the plan start date). This would provide a HLS of 5.65 years.
29. This calculation relies on the use of a reduced annual requirement of 568 dpa for most of the years, as it is based on the stepped trajectory set out in Policy SP3. It is also based on what we consider to be unrealistic commencement/housing delivery dates for two of the Garden Communities (North Uttlesford and Easton Park, as set out above). So, whilst the Council can, in theory, demonstrate a 5.65 year HLS, we are concerned that if the housing delivery at North Uttlesford and Easton Park slips by just one year, as seems very likely, this would result in 100 less dwellings in this 5 year period. This would result in a very fragile 5 year HLS position.
30. An additional factor is that around 14,000 homes allocated in the plan would be delivered after the plan period. As such, the plan is establishing the growth strategy for meeting the Council's long-term needs. Clearly it is not a problem to look beyond the plan period, but the number of homes that would be effectively allocated beyond the plan period would be similar to the identified OAN figure for the current plan period.
31. However, the scale of the need for housing for the next plan period is currently unknown and uncertain. We are concerned that the Council's chosen strategy would mean that other sites in the district would not be developed or permitted for a significant period of time in the future. This would be likely to adversely affect the vitality and viability of services in

existing towns and villages and result in a lack of housing choice in the market. It would also be difficult to accommodate changes in demand for certain types of development/services required over the very long period being committed to within the current strategy.

32. Furthermore, if the three Garden Communities allocated in the plan are granted planning permission and then work is commenced on site, it would be very difficult to deviate from this strategy. To do so, and to leave the intended Garden Communities effectively uncompleted, could potentially result in relatively small pockets of residential development in the open countryside that would not have the sustainability credentials of Garden Communities and would not ordinarily be supported. The Framework recognises that it is crucial that Local Plans should '*allocate new sites to promote development and flexible use of land, bringing forward new land where necessary...*' (paragraph 157). The current strategy which relies on the Garden Communities to deliver 4190 dwellings in the period 2023/24 – 2032/33 (the end of the Plan period), against a target in this period of 7190 dwellings carries with it significant risks and a lack of flexibility.
33. Finally, the Framework (paragraph 47) requires local planning authorities to '*use their evidence base to ensure that their Local Plan meets the full objectively assessed need for market and affordable housing in the housing market area...*' It also requires that through a Strategic Housing Market Assessment, local planning authorities should understand housing needs in their area and identify the housing that the local population is likely to need over the plan period which (amongst other things) addresses the need for all types of housing including affordable housing (paragraph 159).
34. The Council accepts that there is already an affordability issue in the district. The supporting text to Policy H6 states that there are, and will continue to be, many households in Uttlesford lacking their own housing or living in housing that is inadequate or unsuitable, who are unlikely to be able to meet their housing needs in the housing market without some assistance. The proposed stepped trajectory which arises from the strategy's reliance on the Garden Communities, would result in a worsening affordability problem as it would delay the provision of housing to meet the identified need in the district for a number of years. This is also a significant concern.

Employment Use

35. Whilst noting the main modifications suggested by the Council to provide indicative figures for employment floorspace in the Garden Communities (MM/03/15, 16, and 17), we are concerned that at this stage there is no information about where in the Garden Communities employment uses would be provided and more importantly when they would be delivered. The ethos of Garden Communities is that they are sustainable.
36. Garden Community Principle 4 envisages a wide range of local jobs within easy commuting distance from homes. Ideally, as many residents as possible would live and work within the Garden Communities and thus reduce the need to travel long distances to work, especially by private car.

Policy SP5 envisages that each Garden Community would demonstrate high levels of self-containment.

37. This is more likely to be successful if the employment uses, or at least some of them, are provided during early phases of development. Otherwise there is a risk that the Garden Communities would become little more than commuter settlements. This would require further work to be undertaken, in conjunction with the site promoters, to at the very least identify zones within the Garden Communities where the various employment uses will be located, at what stage they will be completed and how they will be delivered.

Transport and Infrastructure

38. This section of the letter deals with transport and infrastructure matters where they are interlinked or generic. Other separate matters are dealt with in the specific sections dealing with the individual Garden Communities later in our letter.
39. It is a core planning principle of the Framework to '*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable*' (paragraph 17).
40. The Guidance, at paragraph: 001 Reference ID: 54-001-20141010 advises that '*it is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector. The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources*'.
41. The Uttlesford Local Plan Infrastructure Delivery Plan July 2019 (IDP) (ED27 and ED27A) downgrades several highway infrastructure items from 'critical' to 'necessary' (compared to an earlier version), such that they are no longer required to be in place before development at the Garden Communities can commence. In particular, a RTS is proposed for West of Braintree and Easton Park (also referred to as Bus Rapid Transport (BRT)).
42. The plan seeks to bring about a step change increase in sustainable travel modes at both Easton Park and West of Braintree, to achieve significant use of public transport, with trips by active modes and public transport making up to 60% of all trips (paragraphs 3.90 and 3.107 of the plan). Policies SP6 (Easton Park) and SP8 (West of Braintree) both require from the early delivery phase a high quality, frequent and fast rapid transport measure to be provided. Also, there was general agreement amongst all the parties, including the Council, at the hearings that the RTS would need to be in

place from the early delivery phase of the Garden Communities to fulfil their anticipated role and to meet these ambitious targets and the modal shift relied upon.

43. In this context it is difficult to understand why the RTS is classified as 'necessary' rather than 'critical' in the IDP given that it is fundamental to the delivery of two of the largest sites allocated in the plan. This downgrading is also evident in the Council's response to the targeted representations (ED72). With reference to ED13 (Bus Rapid Transport for Uttlesford Supplementary Technical Study), the Council confirms that in the early phases the Garden Communities would be served by a conventional bus service, with a RTS only coming online when there is population to support it, (2029–2033).
44. The Council also advises that it is not necessary to delay the housing delivery to allow for the delivery of the RTS. Whilst appreciating the difficulties in providing a full RTS service from the outset and recognising the role of incremental improvements, in our view, the lack of a RTS until towards the end of the plan period would mean the modal shifts anticipated would not be realised. Moreover, the use of less sustainable modes of travel could have become engrained in the habits of residents living in the homes built within the early phases of the Garden Communities. According to the latest trajectory in ED51 this would be well in excess of 1000 homes.
45. There is valid, widespread concern, shared by us, that the infrastructure serving the Garden Communities would fail to meet the true BRT standards until after 2033. Table 3-2 of ED13, shows that after 2033 it is predicted that there would be a service every 5 minutes, between 6am and 10pm. This would be around 8-10 years after the delivery of the first homes. From 2024 until 2033, services would gradually increase from every 15 minutes to every 10 minutes. But this would depend upon commercial viability.
46. This being so, there is a danger that the Garden Communities would be served by little more than a conventional, regularly running bus service for a good number of years. This would use the existing road network, which is at times congested and there are concerns that such a bus service would be no quicker, and potentially slower, than travelling by car. It is also unclear to what degree the buses would run on existing roads as opposed to segregated bus lanes or busways and how the latter would be phased in.
47. Buses running on existing unsegregated carriageways, even based on a 10 or 15 minute service, is unlikely to encourage the residents to use their cars less for local journeys, despite this being better than the services that operate in Uttlesford at present. We consider this would be directly at odds with Garden Community Principle 7 which requires integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.
48. It would also run contrary to proposed Main Modification MM/3/19 to Policy SP5 which seeks to introduce new text indicating that the new communities will be planned around a step change in integrated and sustainable

transport systems that puts rapid transit networks, among other things, at the heart of growth in the area.

49. It is unclear at this stage which routes would be used for the RTS and how much of the routes would be shared with existing road users or on segregated/dedicated bus ways/lanes. As such, these have not been mapped or costed. This being so, the need for additional land to be identified/safeguarded in the plan to ensure the route of the RTS cannot be ruled out.
50. Accordingly, the scale and nature of the necessary road improvements and details of any vehicle restrictions that may be needed on the RTS route (and other routes) have not been set out. Additionally, little consideration has been given to whether there are likely to be any land assembly issues and/or costs or if Compulsory Purchase Order (CPO) powers would be required to deliver the route (and how long these processes would take).
51. Furthermore, consideration would need to be given to the impact on heritage assets, biodiversity, character and appearance and landscape of any sections of the route that would not utilise existing roads. It is also evident from the Council's response in ED72 that much work is yet to be done to establish how the route would be achieved to Stansted Airport.
52. Reference is made to the possibility of a 'new direct connection' between the airport and the road network to avoid the use of the airport entrance roundabout by the RTS. All these matters are likely to have a bearing on the costs and timing of the RTS, and so its viability and deliverability, and are yet to be properly considered.
53. Policy S6 relating to Easton Park, anticipates bus/rapid transport measures to Great Dunmow and beyond. In considering sustainable transport, ED52 (Statement of Common Ground between Landsec and Essex County Council) states that the Council and the Highway Authority have developed a BRT proposal for the Local Plan which connects Stansted Airport to Braintree via Easton Park, Great Dunmow and West of Braintree.
54. However, the Council's responses in ED72 confirm that the RTS could be provided in discreet segments and that any links via the RTS to West of Braintree (from Easton Park) would only be provided beyond the plan period. These positions do not seem to be aligned. Whilst appreciating that Easton Park and West of Braintree have different and separate employment destinations, in simple terms the absence of the RTS to West of Braintree and the town of Braintree beyond would mean that for trips eastwards to meet needs other than employment, the future residents of Easton Park would be without the sustainable transport options offered by the RTS.
55. We are also conscious that ED13 and ED36 are predicated on what is now an out of date housing trajectory and are concerned that the delivery of fewer homes than previously anticipated in the early years of the plan at Easton Park and West of Braintree has the potential to affect the delivery of the RTS.

56. The Council accepts that more work is required in relation to the RTS. Paragraph 177 of the Framework indicates that it is *'important to ensure that there is a reasonable prospect that planning infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district wide development costs at the time Local Plans are drawn up'*. In this instance, considerable additional information would be required to establish that the RTS is a practical and viable solution and that it would be delivered at the time it is needed. Section 5.2 of (ED13) identifies the need for a strategic outline business case be developed alongside improved forecasts from a transport model.
57. In ED72 the Council responds to many of the concerns raised in the targeted consultation by acknowledging that further work is needed but indicates that such details would be available at the strategic planning stage. However, this plan is the strategic planning stage. It includes strategic policies, and these include two Garden Community site allocations that are predicted to begin delivering housing in 2023/24 in the case of Easton Park, and 2025/26 in the case of West of Braintree. We cannot agree that the evidence before us as set out principally in ED13 Bus Rapid Transport for Uttlesford - Supplementary Technical Study June 2019 and ED36 Further Information on Bus rapid Transport Modelling, provides a level of detail sufficient to show that the proposed RTS is practical in principle.
58. Easton Park and West of Braintree are reliant on the RTS to ensure they are sustainable communities, and it is critical that the evidence to support it is provided at this stage. It is not sufficient to say that these really important matters would be resolved at a later date. This work would need to be done now so that the development plan provides the necessary certainty of delivery, particularly given the housing trajectory before us and the significant reliance on Easton Park and West of Braintree to deliver homes (in the case of Easton Park within the next 5 years).
59. Finally, regarding infrastructure, the Framework sets out that it is *'crucial, Local Plans should plan positively for development and infrastructure in the area...'* (paragraph 157) and we continue to be concerned that significant gaps remain in the IDP for the cost of the provision of gas, water, waste, wifi/broadband and significant amounts of the social infrastructure items such as allotments, play space, amenity green space, to name a few. There are also considerable variations in estimated costs for 'big ticket' items, including transport infrastructure. For example, the A11/A1301/Stumps Cross Roundabout improvements are estimated to be between £5 million and £10 million and the improvements at B1256/A120 Dunmow Hoblongs junction are estimated at between £2 and £10 million.
60. There is also a lack of clarity about what the various planned sustainable transport upgrades would cost and until this is known and built into a robust viability assessment the viability of these Garden Communities is an unknown. Overall, the lack of evidence in relation to transport and infrastructure reinforces our concern that the Garden Community policies are not justified and effective.

Viability

61. The Framework advises that '*pursuing sustainable development requires careful attention to viability and costs in plan making...*' and states that '*plans should be deliverable*' (paragraph 173). The Viability Assessment 2018 (VA) carried out by Troy and Three Dragons was undertaken prior to the most up to date IDP and the revised housing trajectory. Moreover, as previously set out, there are a number of 'big ticket' items in the IDP, some of which would require funding up-front before any returns on the development would be seen. In addition, the IDP has many infrastructure items that have no known costs, as set out above.
62. The VA makes broad brush assumptions about the infrastructure costs for the three Garden Communities, based on typologies. It clearly shows in graph form the significant difference a change in infrastructure costs of £10,000 per dwelling (£50,000 as opposed to £40,000), can make to viability and so it is critical that this figure is as accurate as possible. Therefore, it is important that the viability assessment should use the most up to date infrastructure cost estimates rather than case studies and be based on maximum costs where there is a range. This is particularly important given the VA does not contain any specific contingency allowance.
63. Also, Appendix B to *Viability Testing Local Plans – Advice for planning practitioners (June 2012)*¹, advises in relation to costs of promoting schemes and associated fees that on large scale schemes care needs to be taken not to underestimate these. It suggests that fees relating to design, planning and other professional fees can range from 8-10% for straightforward sites to 20% for the most complex. The Council's VA allows for a higher percentage (12%) on the smallest of sites (10 units or less), but only 6% for the Garden Community sites. We consider this figure to be far too low, particularly as these sites are likely to be more complex than straightforward.
64. The build out rate and sales of dwellings would naturally be slower in the early stages of the development, as reflected in the housing trajectory, which has been amended by the Council since the VA was prepared. Combined with slow early delivery rates, there would be in the early years, disproportionately high infrastructure costs. Therefore, we are concerned that the cost of interest from borrowing and particularly peak debt has not been factored in at an appropriate level.
65. Table 5.4 of the VA shows viability results for 10,000 units across a range of scenarios. We are concerned that in the scenario with £50,000 of infrastructure cost per dwelling, where only 95% of the market value is achieved on the sale of the houses, there is very marginal viability. This scenario is a real possibility given the amount of infrastructure that would need to be funded, including the RTS and the fact that the spatial strategy would see three Garden Communities delivering dwellings during a similar timeframe and so competing for house sales.

¹ Document referred to at the hearings, published by The Local Housing Delivery Group

66. The VA at paragraph 5.20 advises that *'this scheme delivers housing over a long trajectory (38 years) and is very sensitive to changes of phasing. Small amendments to the timing of infrastructure items or delivery of residential units as well as to the housing density or mix can make a significant difference to the results. A developer would be able to maximise these factors to the advantage of economic viability and we do not consider that these marginal results would render a study undeliverable'*.
67. We have reservations that some of these 'amendments' may not be in the gift of the developer and housing density and mix, for example, may be controlled by a Local Plan Policy. Also, this scenario could lead to an erosion of some of the key principles of Garden Communities set out in Policy S5, such as the provision of mixed tenure homes and housing types that are genuinely affordable for everyone; beautifully and imaginatively designed homes with gardens; development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains and using zero-carbon and energy-positive technology to ensure climate resilience; and integrated and accessible transport systems, within walking cycling and public transport designed to be the most attractive forms of local transport.
68. Given these findings in relation to the long development timescales and the need to ensure that these large scale sites would deliver homes not only in the early years of the plan but for many years to come, in a policy compliant manner, we consider that a revised VA based on the residual valuation appraisal method would need to be supplemented with a discounted cashflow assessment (a valuation method used to estimate the value of an investment based on its future cash flows), in order to provide a more complete and robust analysis.
69. To summarise, the scale of funding necessary and whether the Garden Communities could support such costs is uncertain. For these reasons it has not been adequately demonstrated that the Garden Communities proposed in the plan are financially viable and therefore developable.

Proposed Garden Communities in Detail

North Uttlesford

70. North Uttlesford is in the north west of the District, adjoining the boundary with South Cambridgeshire and is identified in Policy SP7 for 5000 new homes. It is recognised in the plan as being an area of high landscape and visual sensitivity, given its steeply sloping landform and elevated position with open fields and limited vegetation. It is also accepted that the development of the site has the potential to harm the significance of heritage assets on the site, and in the wider area.
71. The Framework at paragraph 126, is clear that Local Plans should set out a positive strategy that recognises that heritage assets are an irreplaceable resource and conserves them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account the desirability of sustaining and enhancing the significance of

heritage assets.

72. The HIA finds that North Uttlesford is situated within a sensitive landscape with significant highly sensitive areas and contains extensive heritage assets, comprising built heritage as well as, known and unknown archaeology. It identifies as highly sensitive the immediate setting of the Roman Temple Scheduled Monument which is within the site allocation and the visual and historic relationship to the Roman Fort Scheduled Monument at nearby Great Chesterford.
73. Paragraph 132 of the Framework recognises that Scheduled Monuments are of the highest significance and substantial harm or loss of them should be wholly exceptional. The HIA also highlights that there is evidence of significant buried archaeology on the site and in the wider area which contains evidence of human occupation from the Palaeolithic period onwards. There are other heritage assets nearby including listed buildings and several Conservation Areas.
74. The site promoter's illustrative masterplan indicates that around 42% of the site area would be developed, with 54% remaining for green infrastructure, agricultural land or outdoor recreation. We also note that the Council anticipates around a 50:50 split between developable land and open space.
75. Nevertheless, Historic England maintain an in-principle objection to the development at North Uttlesford due to the potential impact on the highly sensitive historic environment and consider that an alternative location should be sought for the development.
76. The Roman Temple complex consists of below ground archaeological remains and is a Scheduled Monument. It is set away from the Roman Town, but is significantly associated with it, both by function and by physical links in the form of Roman roads. The HIA finds that views between the Roman Town and the Roman Temple and the Great Chesterton Conservation Area make a major positive contribution to its significance.
77. This area is identified as being of high sensitivity in the HIA. Despite the retention of open areas within the site, given its scale, the proposed Garden Community would introduce major change to the setting of the Roman Temple that would be likely to affect its relationship with the Roman Town and the wider landscape. Paragraph 132 of the Framework indicates that *'significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting'*.
78. Historic England advises that the geographical and topographical location of Great Chesterford on the north west boundary of Essex in the Cam valley, at the entrance to the Fens in a gap in the chalk hills is one of its important defining attributes in terms of its archaeological significance. The HIA is clear that the area surrounding and within the site is rich in archaeology.
79. The HIA considers that the extent of the archaeology already identified at the site and nearby points to the possibility of a wider distribution of remains across the site. It also refers to previous excavations of remains

on and around the site as well as chance finds. The Brief Archaeological Impact Assessment of the Proposed Uttlesford Garden Communities July 2018 Place Services (Document 1000.1 HEN) indicates that extensive archaeological deposits of multi-period date are likely to survive here.

80. The Historic Environment Record identifies a number of pre-historic sites in the form of Bronze and Iron Age burial sites. It also refers to the possibility of Roman structures and burials bordering the route between the Roman temple and the Roman town (which runs through the site) and evidence of an Anglo-Saxon burial ground and the presence of both pre-historic and Roman settlement.
81. This being so, based on current knowledge, it seems highly likely that there are remains of significance within the site. Accordingly, the proposed development has the potential to cause harm through the loss of important and extensive heritage information and of the opportunity for increased understanding of the history and development of the area, even assuming around 50% would be undeveloped.
82. The HIA further recognises that the significant buried archaeology on the site may further add to the understanding and significance of the area and the inter-relationships between the other heritage assets on the site and nearby. As such, the evidence base on this matter is currently inadequate. Further archaeological investigations would need to be undertaken to establish the likely scale and significance of archaeological remains on the site.
83. Presently, the proposed Garden Community at North Uttlesford is not justified by the historic heritage evidence available and we share Historic England's views that there is a possibility that it is not a suitable location for the development proposed due to its impact on the significance of heritage assets. Also, as set out earlier in our letter, the SA was carried out in advance of the HIA, which in this case is a concern given the findings of the HIA.
84. The Council's Landscape and Visual Assessment (Chris Blandford Associates June 2017) finds that the landscape sensitivity to a new settlement here would be high, given the open hill slopes and topography of the site. The landscape means that the upper ground on the site is highly visible from a considerable distance. Historic England are also concerned about development on the higher ground in terms of its impact on heritage assets.
85. Having visited the site and viewed the indicative masterplan we are also sceptical as to how development on the high ground including the sensitive upper valleys and ridges could in practice be avoided if the quantum of development proposed, as well as the other necessary facilities that would make it a sustainable community, were to be provided. This issue also has the potential to affect the capacity of the site for development and consequently viability. In light of these matters, it is our view that North Uttlesford is not currently justified due to the harm that would be caused to the landscape and to the significance of heritage assets.

86. Turning to highway matters, the supporting text to Policy SP7 states that developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford. The Council indicates that these highway improvements would be in the A505 corridor to provide additional capacity. The Council recognises that additional transport improvements would be required in the A505 corridor to accommodate the further housing provision at North Uttlesford.
87. The revised text set out in ED70 (and to be introduced as a main modification) indicates that *'the proposed developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford' and that 'development beyond that would depend on strategic capacity improvements on the A505 corridor'*. It adds, *'it is proposed that beyond the end of the plan period, a cap of 3,300 new homes is placed on any the allocation at North Uttlesford Garden Community to ensure that development over this figure does not take place until strategic improvements have been implemented'*.
88. However, the Council's response to representations made as part of the targeted consultation exercise that took place after the hearings, in Document ED72 (pages 21 and 29) suggests that transport modelling has identified that the interim junction improvements would accommodate a development of up to only 2,700 dwellings. There appears to be some ambiguity here that would require clarification.
89. The A505 Corridor Study is being prepared and led by Cambridgeshire County Council. Whilst the Council have indicated that the study is due to be commenced shortly (Matter 8 Hearing Statement) no clear timelines or funding for this piece of work have been provided. As things stand it is not clear to us what improvements would be required to deliver more than 2,700 or 3,300 homes at North Uttlesford, what they would cost, and when they might happen. ED70 suggests that a funded strategic scheme (strategic capacity improvements) is anticipated towards the end of the plan period, by year 14 (2031/32). However, it also seeks to put in place a contingency to deal with any delay in that strategic scheme coming forward.
90. This does not inspire confidence and leads to a good deal of uncertainty. The Council advises in response to the targeted representations, that it has identified specific schemes to address transport impacts in Cambridgeshire if no strategic scheme were available. However, the details of such schemes do not appear to be before us. The possible lack of a strategic scheme to address capacity on the A505 and the potential inability of the site at North Uttlesford to grow beyond 2,700 or 3,300 homes would be likely to have a significant effect on the overall masterplan for this Garden Community and what could be provided there. It would also have further implications for, amongst other things, viability.
91. Additionally, we are conscious that not only is the production of the A505 Corridor Study largely outside of the Council's control, but also that cross boundary highway and other transport matters and improvements affecting

North Uttlesford are reliant on Cambridgeshire County Council, South Cambridgeshire District Council, Greater Cambridge Partnership or Cambridgeshire and Peterborough Combined Authority. However, notwithstanding the Position Statement from Cambridgeshire County Council, these partners are not signatories to any SoCG provided to this examination. As such, we cannot be assured that they agree and are committed to the necessary infrastructure for North Uttlesford Garden Community.

92. Aside from these points, we have serious doubts whether in the absence of a RTS and considering the train station capacity issues at Whittlesford Parkway Station we heard about at the hearings, the transport measures proposed at North Uttlesford are truly sustainable and in line with Garden Community principles.
93. We are also concerned about the apparent lack of bus provision/links to Saffron Walden and other locations listed in Policy SP7 alongside the focus on bus links to employment opportunities and train stations. This is not included in the IDP update (only a footpath and bicycle route are identified). In this context we question whether the IDP would deliver the aims of Policy SP7 to provide a package of measures to provide transport choice at North Uttlesford, including the delivery of high quality, frequent, and fast public transport services to Saffron Walden (and other destinations).
94. Finally, we are aware that the planning application for the proposed development at the Wellcome Genome Campus site, has recently been granted permission for a significant scheme. That could have ramifications for this plan and in particular the North Uttlesford Garden Community site allocation. Therefore, further work would need to be undertaken to understand the cumulative impacts of that development alongside North Uttlesford on transport in the immediate and wider road network and on rail station capacity.

Easton Park

95. Easton Park is a greenfield site between Great Dunmow and Stansted Airport. Policy SP6 anticipates a new Garden Community of 10,000 homes. The Council accepts that the site contains a number of constraints such as landscape and heritage features, including ancient woodland, scheduled monuments, Easton Lodge Registered Park and Garden, a number of listed buildings and that it is adjacent to the Little Easton Conservation Area.
96. The HIA finds the site to be in an area of moderate to high sensitivity and concludes that Easton Park has the potential to harm the significance of heritage assets. It identifies a number of areas within the site as having a high sensitivity. Notably, these include the northern section of the site around the Registered Park and Garden and Little Easton Conservation Area where there are views into and out of the site.
97. Historic England considers that the HIA, through its sensitivity testing, effectively identifies a reduced developable area at Easton Park and accordingly objects to any development within the site, north of Park Road.

Despite this, the Council anticipates that there is scope for some appropriately sensitive development on this part of the site (Matter 8 Hearing Statement).

98. We also note that this part of the site is shown to accommodate buildings on the site promoter's masterplan. Again, having visited the site and considered the evidence before us, we share Historic England's view that the sensitivity of the historic environment has not been adequately considered by the Council and we conclude that unless evidence is produced to show that it could be acceptably developed, development should not take place within this part of the site. Consideration would need to be given to what implications this has for the capacity of the site and its viability.
99. In addition, the HIA fails to consider the historic asset of Stone Hall (a Grade II* listed building) to the south of the site which was not accessible at the time of the survey. Historic England notes that Stone Hall responds to a wider rural setting which contributes to its setting. This is a serious omission that undermines the reliability of the HIA and would need to be re-considered.
100. Regarding transport and infrastructure matters, we understand that a committed interim improvement scheme at junction 8 of the M11 is being progressed by Essex County Council. The modelling analysis that has been undertaken suggests there is sufficient capacity to accommodate traffic growth up to a point between 2025 and 2030. However, it seems highly likely that further infrastructure improvements would be required at Junction 8 at some stage in the future.
101. Highways England are currently in the process of investigating strategic interventions to Junction 8 (and to the M11 between Junction 8 and 13) to help determine spending within the Department for Transport's next Road Investment Strategy. Given the potential for this to delay development at Easton Park more clarity would be needed as to when the outcome of these investigations will be known and as to the likelihood of the funding being available.
102. As set out in the transport and infrastructure section of this letter, more information would be required to support the RTS. In relation to Easton Park ED13 suggests the RTS should be given exclusive use of sections of the B1256 Great Dunmow bypass. We share the concerns raised by a number of representors as to how this would work in practice and whether it would have the effect of forcing traffic to use the High Street and thus reversing the benefits of the bypass.
103. ED65 proposes a main modification to determine, among other things, the issue of what further land may be required to deliver the RTS at Easton Park. This indicates a large area of land to the north west of the Garden Community for transport linkages. It is based on a plan provided by the Easton Park promoter in ED66 to show an area within which third party land may be required to provide linkages. The amount of land identified for this purpose is considerable and adds to our concerns outlined above under

the Transport and Infrastructure heading in relation to the land requirements/assembly issues and costs associated with the RTS and its consequent viability.

104. Also, the presence of an underground high-pressure gas pipeline crossing the site has recently come to light. Document ED75 proposes a main modification to Policy SP6 to reflect this situation. However, it has not been established what implications arise from the pipeline and its associated easements/restrictions (as described in ED75) in terms of the masterplan for Easton Park including any effect that it may have on the capacity of the site to accommodate development. This work would need to be undertaken.

West of Braintree

105. West of Braintree straddles the boundary with neighbouring Braintree District Council and would form part of a wider proposed Garden Community which is being advanced through the North Essex Authorities (NEA) local plan. That plan is also currently being examined. Policy SP8 of the Uttlesford plan indicates that the overall new Garden Community at West of Braintree would create a new community of 10,500 – 13,500 homes, up to 3,500 of which would be in Uttlesford.
106. During the hearings, the Council sought to reduce the number of dwellings that this allocation would deliver during the plan period by 330, from 970 to 640. It is accepted by the Council that the Uttlesford part of the wider Garden Community is wholly dependent on the Braintree element of it going ahead because the size of the Uttlesford part of the Garden Community would not be sufficient to deliver a Garden Community. The Council's addendum of focussed changes recognises the elevated risk around the delivery of the Uttlesford part of West of Braintree as a result of the initial findings of the NEA Local Plan Inspector in his letter of June 2018.
107. In this context, whilst our role is to examine the soundness and legal compliance of the Uttlesford plan and the proposed allocations within that area only, given that it is not a standalone proposal, it is vital that the Uttlesford plan's assessment of West of Braintree's sustainability and viability should be undertaken on the basis of the whole Garden Community (i.e. also including that part of it within Braintree District).
108. The examination of the NEA plan is ongoing. Whilst documents (ED47-47K) were submitted to this examination during the hearing sessions, they were prepared for the NEA examination, and are for that examining Inspector to consider in the first instance. The NEA Inspector has yet to conclude whether the West of Braintree allocation in that plan is sound. As the Council has recognised in its suggested main modifications, his findings will have ramifications for the housing strategy and numbers in this plan.

Objectively Assessed Need for Housing Land

109. Examination document ED32 is a response to our request at the hearings that the Council consider a Main Modification to SP3 to make it clear that 504 dwellings of the housing requirement relates to bed spaces in

communal establishments. The proposed main modification to Policy SP3 does this, however, there is another issue. The calculation of the housing requirement of 14,000 dwellings will have double-counted the 504 people who live in communal establishments. They will have been included already within the census data which provided the starting point for the OAN figure, but it seems they were also identified and added on again between the Regulation 18 and Regulation 19 consultations.

110. If the housing requirement figure is lower, this would affect the other housing calculations, such as the 5-year housing land supply (HLS) and require other consequential main modifications too.

Hatfield Forest Site of Special Scientific Interest (SSSI)

111. There are objections from Natural England to the plan arising from a lack of mitigation measures to address recreational impacts of development in the district and, in particular, of the proposed Garden Community at Easton Park, upon Hatfield Forest SSSI. We share their concerns but are aware that the Council is working with The National Trust, Natural England and neighbouring Council's which fall within the zone of influence of this SSSI, on a mitigation strategy. This matter would also need satisfactorily resolving.

Overall Conclusions

112. We are very conscious of the considerable work that has been undertaken over several years by the Council and the promoters of the Garden Communities in developing them as proposals. We are also aware of the in-principle support afforded to them as a concept by the Government and the funding that has been provided. However, for the reasons given, the Garden Communities are insufficiently justified and have not been shown to have a reasonable prospect of being delivered as submitted. Moreover, the unsolicited documents referred to in paragraph 4 above do not deal with these matters.

113. Consequently, as things stand the strategy set out in the plan is unsound.

In summary, our main concerns are:

- The lack of clear mechanisms to ensure the Garden Community Principles will be met;
- The need to define precise boundaries and to show these on the policies map;
- The proposed housing delivery trajectory is overly optimistic;
- There is unlikely to be a 5 year HLS on adoption;
- The stepped trajectory unreasonably delays addressing the housing affordability problem;
- The Garden Community approach predetermines the strategy long beyond the plan period and so is unduly inflexible;
- As part of the assessment of reasonable alternatives the SA does not consider a smaller number of garden communities, in combination with more housing in existing sustainable settlements, nor does it have regard to the evidence in the HIA;

- The lack of certainty about the delivery of employment uses undermines the potential for the Garden Communities to be sustainable places;
- The costs, viability and deliverability of the RTS are uncertain and any benefits would be realised too late to help ensure the Garden Communities at Easton Park and West of Braintree would be sustainable places;
- Realistic infrastructure costs have not been established meaning it is uncertain whether the Garden Communities will be viable and developable;
- The North Uttlesford Garden Community is flawed in terms of landscape and heritage impacts and the potential for the A505 improvements and public transport infrastructure are uncertain, undermining the potential for this Garden Community to be a sustainable place;
- The Easton Park Garden Community is flawed in terms of heritage impacts, the potential for highway improvements to M11 junction 8 and the M11 between junctions 8 and 13 are uncertain pending further investigations by Highways England and the unknown implications of the gas pipeline crossing the site on its capacity for built development;
- The West of Braintree Garden Community is flawed since the sustainability appraisal and viability assessment only considers the part of the site within Uttlesford despite it being dependent of the delivery of the larger proposed site allocation in Braintree District.

In addition, further work would be needed on:

- Mitigation measures for Hatfield Forest Site SSSI;
- The housing requirement and trajectory in relation to people in communal establishments.

114. In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5 year HLS, until the Garden Communities begin to deliver housing. This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing. It would also create a buffer, so the target of 14,000 homes is not only just being met by a narrow margin and would allow for a less steeply stepped housing trajectory.

115. Hand in hand with this approach, our view is that the Council should delete one of the Garden Communities from the plan. Our suggestion would be that this should be North Uttlesford, which for the reasons set out above, seems to have the most barriers to its development and perform the least well against the Garden Community Principles. As well as realising the benefits associated with the provision of a wider range of sites described above, to do so would realistically acknowledge and address the enormity of the scale of the highly ambitious task of delivering three Garden Communities in the district at once. It would also reduce the post plan period development by around 3000 dwellings, thus providing the potential

for a variety of small and medium sized sites to be allocated in the next local plan period, if appropriate.

116. We must stress however that in suggesting this course of action we are not endorsing the other Garden Communities in the plan. Our identified concerns in relation to the significant issues to overcome at Easton Park and West of Braintree remain and an enormous amount of further work would be required, as outlined above, to justify these ambitious allocations.

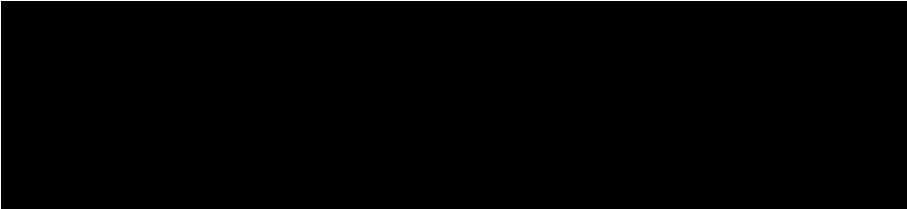
Next Steps

117. In our approach to the examination we have given great weight to the guidance to Inspectors on the examination of local plans in Greg Clark's letter to the Chief Executive of the Planning Inspectorate of 21 July 2015 (as recently restated in James Brokenshire's letter of 18 June 2019). At the same time, the recently updated Procedure Guide for Local Plan Examinations makes clear (third bullet point of paragraph 8) that one of the three possible outcomes for an examination is that there are soundness problems with a plan which it is not possible to address by main modifications and that, in advance of a formal recommendation of non-adoption, Councils would be asked to consider withdrawing the plan.
118. We must examine the plan against the soundness tests set out in the Framework and determine whether it is justified and effective. The points covered above are fundamental matters which relate to the soundness of the plan.
119. To address our concerns, the Council would have to prepare a very considerable amount of new evidence. Since the plan was submitted in January 2019 much new evidence and information to support it has already been produced and continues to be submitted. Although we accept that some of this has been at our request, that is not so in all cases.
120. During the course of the examination, so far the Council has sought to amend and justify significant strategic elements of the plan including: revised start dates for the Garden Communities; different housing numbers within the plan period; a revised trajectory; altered methodology for calculation of 5 year supply; detailed changes to Garden Communities policy wording arising from late Statements of Common Ground with key partners and statutory consultees; late emergence of transport RTS/BRT details; Hatfield SSSI draft Mitigation Strategy; a sports strategy; an updated IDP; and the need for additional targeted consultation after the hearings sessions which has lengthened timescales and added another layer of complexity to the process.
121. Documents, including an updated IDP (October 2019), continue to be submitted without the opportunity for participants to comment. To some degree, these are evidence base documents which should have informed the plan making process. As things stand, there are some 81 items in the Examination Documents library that have been submitted following the submission of the plan (and this number continues to grow). We fully appreciate the long timescales involved in the local plan process and understand that things move on.

122. Nevertheless, we share the views of a number of the participants in the examination that it is difficult to keep track of and understand the large volume of additional material that has been submitted and continues to emerge. This is especially problematic for local residents. There is also a risk that this additional material, and any further evidence that is produced, seeks to justify the strategy set out in the plan rather than informing the plan making process which is how it should be used.
123. Proceeding with this examination is likely to become protracted. It would be procedurally challenging to manage in practical terms and extremely difficult for participants to engage with. There is also no guarantee that this plan would be found sound at the end of that long and complex process.
124. We estimate it would take between 1 and 2 years, possibly longer, to complete the necessary work and that would include work which is normally undertaken as part of the plan preparation process, and to consult upon it. Also, any lengthy pause in the examination is likely to lead to the need to revisit the objectively assessed need for housing (OAN). The OAN for Uttlesford is based on the Strategic Housing Market (SHMA) update 2017 which in turn is based on the 2014-based household projections. If new national household projections were to be published, it would be necessary for this examination to consider whether the change was meaningful, in line with the advice in the Guidance. Other parts of the evidence base could also become out of date during this time. All this additional work and any changes the LPA considers necessary to the plan would need to be consulted upon and further hearings held.
125. Moreover, we consider that the work likely to be necessary goes well beyond what could be reasonably addressed by main modifications to the plan. The Council has already suggested a considerable number of main modifications and additional modifications to the plan (around 120 MMs and a similar number of AMs at 14 October 2019). These include amongst other things changes to the housing numbers in the Garden Communities, the altered housing trajectory, a suggested additional policy, a new Garden Community Inset Plan and the inclusion of employment figures for the Garden Communities. With the further work that is necessary the number of main modifications would be very likely to become much greater still.
126. As you will be aware, the examination process is not intended to allow the Council to carry out major changes to the plan or to complete the preparation of its evidence base. Based on our concerns about the soundness of the plan set out above we anticipate that the changes necessary would amount its almost complete re-drafting. The Guidance advises that where the changes recommended by Inspectors would be so extensive as to require the virtual rewriting of the plan, it is likely to be suggested that the local planning authority withdraw the plan.
127. We believe that the key decisions to be made on the future of the Garden Communities and the spatial strategy need to be taken by the Council, in consultation with local residents. The most effective and transparent way

to do this would be through the preparation of a new plan, based on a robust SA, rather than emerging as our recommendations in main modifications.

128. We realise that the Council's preference might be to continue with the examination if at all possible and, although we will not reach a final decision on the way forward until we have had the opportunity to consider the Councils' response to this letter, we are of the view that withdrawal of the plan from examination is likely to be the most appropriate option.
129. We appreciate that this will be not be the news the Council were hoping for and that you may need some time to reflect on the contents of this letter and to determine the preferred course of action. We are not setting a deadline for a response from the Council, but an early indication of when the Council is likely to be able to provide a response would be appreciated.
130. We are not seeking a response to this letter from any other parties and will not receive any comments on it. Nevertheless, we are happy to provide any necessary clarification to the Council via the Programme Officer.



BaSRAG Response to Stroud District Council Local Plan Review June/July 2021

Objection to site allocation PS36 Sharpness new settlement

Annexes

Annex 4 FOI response received in relation to the Garden Communities programme and the application related to Sharpness Garden Village



Homes
England

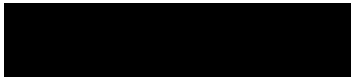
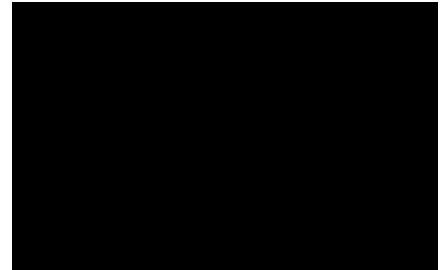
Date: 27/05/2020

Our Ref: RFI2943

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

Making homes happen



RE: Request for Information – RFI2943

Thank you for your request for information, which was processed under the Freedom of Information Act 2000 (FOIA). For clarification, you requested the following information:

I am writing under the Freedom of Information Act to ask for the following information:

Any correspondence concerning the proposal for a Garden Village/Community/Settlement at Sharpness in Gloucestershire.

Any reports/correspondence which contain(s) information about the government's decision on whether the above proposal should receive assistance under the Garden Communities programme.

Any assessments/evaluations which show whether the above proposal meets the criteria for assistance under the Garden Communities programme.

This relates to the following time period:

The last two years (January 2018 - current date 2020)

Response

We can confirm that we do hold information that falls within the scope of your request, which is attached as Annex A.

Information contained within Annex A has been redacted under the following exemptions:

Section 40 – Personal information

We have redacted information on the grounds that it constitutes third party personal data and therefore engages section 40(2) of the FOIA.

To disclose personal data, such as names, contact details, addresses, email addresses and personal opinions could lead to the identification of third parties and would breach one or more of the data protection principles.

Section 40 is an absolute exemption which means that we do not need to consider the public interest in disclosure. Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exemption is engaged.

OFFICIAL



Date: 27/05/2020

Our Ref: RFI2943

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

The full text in the legislation can be found on the following link;

<https://www.legislation.gov.uk/ukpga/2000/36/section/40>

Section 43 - Commercial interests

Under section 43(2) Homes England is not obliged to disclose information that would, or would be likely to, prejudice the commercial interests of any party.

The information requested relating to the proposed Garden Village engages section 43(2) of the FOIA as it is commercial in nature and its release would be likely to prejudice the commercial interests of Homes England and other interested parties to the information.

Homes England has identified that the information requested, if released, would be likely to prejudice the effective operation of the Garden Communities Scheme.

Section 43 is a qualified exemption. This means that once we have decided that the exemption is engaged, Homes England must carry out a public interest test to assess whether or not it is in the wider public interest for the information to be disclosed.

Arguments in favour of disclosure:

- Homes England acknowledges there is a general public interest in promoting accountability, transparency, public understanding and involvement in how Homes England undertakes its work and how it spends public money.
- Homes England acknowledges there is a local public interest in the proposal of a Garden Community at Sharpness.

Arguments in favour of withholding:

- The information relating to viability and cashflow should not be in the public domain, as it relates to ongoing and unverified estimations. If commercial viability assumptions are made public at this stage there would be a high risk to the developer that they could not achieve approvals or planning required. If Homes England were to make this information public there would be a high risk of mistrust between the organisation and our partners, both in this case and in the future. This would not be in the public interest as if partners were not able to share information freely with us, Homes England may have to evaluate bids that were not as robust as they should be. This would not be in the public interest as there is a high risk that public money would not be allocated correctly;
- The information in relation to financial advice should not be in the public domain as it is not verified. It would not be in the public interest to release information that relates to ongoing estimations as to do so could project a misleading picture. There is a high risk that releasing the information would foster public distrust of both Homes England, the Government and the Local Authority. Releasing the information would not be in the public interest as Homes England has to maintain and foster constructive relationships in order to achieve the objectives in our strategic plan;
- The information relating to the assessment of the proposal should not be in the public domain as there is a high risk to both Homes England and the bidder if it were. Negotiations in relation to the site are ongoing and if the information were made public it could prejudice future negotiations Homes England may have in



Date: 27/05/2020

Our Ref: RFI2943

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

relation to the site. If Homes England or the Local Authority were not in a position to negotiate effectively this would severely impact value for public money, which would not be in the public interest. Furthermore, if information relating to the assessment process were in the public domain, this could lead to future proposals being distorted or lead to third parties using the information for their own gain. There is a high risk to the functionality and fair process of the scheme if this information were in the public domain. This would not be in the public interest as funding allocations could be distorted, leading to less effective use of public funds ; and

- Homes England has been unable to identify a wider public interest in disclosing the information requested.

Having considered the arguments for and against disclosure of the information, we have concluded that at this time, the balance of the public interest favours non-disclosure.

The full text of in the legislation can be found on the following link;

<https://www.legislation.gov.uk/ukpga/2000/36/section/43>

Right to Appeal

If you are not happy with the information that has been provided or the way in which your request has been handled you may request an internal review by writing to;

The Information Governance Team
Homes England – 6th Floor
Windsor House
50 Victoria Street
London
SW1H 0TL

Or by email to infogov@homesengland.gov.uk

You may also complain to the Information Commissioner however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

The Information Commissioner's details can be found via the following link

<https://ico.org.uk/>

Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

The Information Governance Team
For Homes England

[REDACTED]

S40(2)

Sharpness is a proposed new settlement south of Newtown/Sharpness Docks of up to 5000 houses and 10 hectares of employment, with the potential for a new station on the spur from the Bristol-Birmingham main line. The promoters are Lioncourt Strategic and Greensquare.

Wisloe is a proposed garden village of 1500 homes, 5 hectares of employment land, situated between the A38 and M5 just north of Cam and south of Slimbridge. The promoters are Gloucestershire County Council and the Ernest Cook Trust (an educational charity).

There are no major relationships between the two, other than both are likely to be predicated on improvements to M5 J14 and the County Council owns land within both sites.

See you on Friday.

Regards

S40(2)

S40(2)

Stroud District Council

Tel: S40(2)

Fax: S40(2)

www.stroud.gov.uk



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From: S40(2) [REDACTED]@homesengland.gov.uk]

Sent: 09 October 2018 17:35

To: S40(2) [REDACTED]

Cc: S40(2) [REDACTED]

Subject: RE: Garden Communities

Thanks for coming back S40(

I remember the Sharpness proposal from our tour but couldn't recall Wisloe although it is quite close by? Is there a relationship between the two?

Regards

S40(

Sent from my Windows Phone

From: S40(2) @stroud.gov.uk

Sent: 09/10/2018 17:16

To: S40(2)

Cc: S40(2)

Subject: RE: Garden Communities

Dear S40(2)

Thanks for your email. All is well here in Stroud, thanks.

I would like to attend the meeting in Bristol on Friday if there is room.

Stroud District Council is about to approve a consultation document on its Local Plan Review and there is likely to be at least two potential sites – at Sharpness and Wisloe Green which may be suitable candidates for the Garden Communities fund.

I have spoken to S40(2) who I think has mentioned that I would like to attend to you. I have also approached S40(2) (Hunter Page Planning) who is providing the planning support for the consortium promoting a new settlement at Sharpness. I have yet to hear back from him but hope that he or a colleague may also be able to attend.

I look forward to speaking about both projects to you and Ian on Friday and in subsequent discussions.

Regards

S40(

S40(2)

Stroud District Council

Tel: S40(2)

Fax: S40(2)

www.stroud.gov.uk



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From: S40(2) @homesengland.gov.uk]

Sent: 09 October 2018 16:24

To: S40(2)

Subject: Garden Communities

Dear S40(

Hope you are keeping well ?

We are holding a Garden Communities prospectus meeting in Bristol this coming Friday.

The invitation went out via Chief Executives but thought i should contact you direct as we have had an expression of interest from S40(2) at Peter Brett regarding Wisloe.

Would you be interested in attending?

S40(2) is leading for the South West and would-be happy to provide more detail.

Regards

S40(

Sent from my Windows Phone

Homes England is the trading name of the Homes and Communities Agency. Our address for service of legal documents is Arpley House, 110 Birchwood Boulevard, Birchwood, Warrington, WA3 7QH. VAT no: 941 6200 50. Unless expressly agreed in writing, Homes England accepts no liability to any persons in respect of the contents of this email or attachments.

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S40(2)

Ridge & Partners LLP
Thornbury House
18 High Street
Cheltenham
Gloucestershire
GL50 1DZ

7th Nov 2018

Ref – Sharpness Garden Communities Bid

Dear S40(

Please accept this letter as our formal support for your bid for Sharpness to be included in the Garden Communities Programme.

GFirst LEP recognises the ambitious scale of the proposed development at Sharpness and shares the view of the local authority that it represents an ideal opportunity to develop a major new sustainable community with good transport connectivity, large scale employment land in close proximity, (including the de-commissioned Magnox site at Berkeley which the LEP has invested c£10m into to develop into the Gloucestershire Science and Technology Park) and the benefit of an adopted local plan as the basis for future development.

A particular characteristic of the Stroud District is the geography which constrains development to a relatively limited area of the district, predominantly along the Severn Vale. A Garden Village at Sharpness would provide the means to significantly impact on the district's housing needs.

Gloucestershire has a pressing need to accelerate the rate of house building and also to ensure the right types of housing is built to meet both current and future needs. Including Sharpness in the Garden Communities Programme would be a significant factor in achieving this.

Yours sincerely

S40(2)

S40(GFirst LEP CIC

DAVID DREW MP

Stroud



HOUSE OF COMMONS

LONDON SW1A 0AA

^{S40(2)}
[Redacted]
Planning Strategy Manager
Stroud District Council
Ebley Mill, Ebley Wharf
Stroud GL5 4UB

9 November 2018

Dear ^{S40(2)}
[Redacted]

Following our meeting to discuss the Garden Communities Programme I am writing to express my support in principle for Stroud District Council to explore the potential for Sharpness Eco Village to deliver a high-quality new community to meet future housing needs within the District.

Building the homes and delivering the jobs that we will need into the future requires public bodies to be ambitious about future plans for housing and growth, whilst ensuring that the infrastructure to support that growth is properly planned for and delivered. I support Stroud District Council's ambitions to meet the future housing needs of its residents by developing sustainable places to live and work with high quality affordable housing and good access to community facilities and public transport.

Whilst recognising that these proposals are at an early stage and have yet to be fully tested through public consultation and the Local Plan process, it is important that opportunities for creating new garden communities through public-private partnerships are fully explored. The concept of garden communities is about environmental quality and community legacy and, provided that mechanisms are put in place to ensure these aspirations are actually delivered, they should be supported.

I look forward to learning more about these proposals as they are worked up and finding out more about how they can contribute to delivering new homes and jobs for local people.

Yours sincerely,

^{S40(2)}
[Redacted]
David Drew MP
MP for Stroud Constituency

Bid to join Garden Communities programme

Bid to join Garden Communities programme

All questions must be addressed, apart from those specifically designated for transformational community proposals and garden villages proposing fewer than 5,000 homes (Q 2, 4). If you have questions, or would like to discuss an proposal ahead of submission, please contact gardencommunities@communities.gsi.gov.uk.

Bids should be submitted by **09/11/2018**

Please click here to open the [prospectus](#).

Name of local authorities and promoters/landowners/developers involved (clearly identifying lead authority):

Stroud District Council (lead authority) and Sharpness Development LLP

Main Contact

S40(2) (Stroud District Council) and S40(2) (Sharpness Development LLP)

Telephone Number

S40(2)

Email Address

S40(2)@stroud.gov.uk

Organisation

Stroud District Council

Headline Information

1. Provide a description of the proposed garden community including proposed number of homes, including types and tenures, number of jobs it hopes to create, employment space, schools and other community facilities, green space provision, number of district and local centres, amount of retail and other commercial space proposed; key items of infrastructure needed to support delivery of the garden community. Please itemise these below.

Housing

Number of homes

5,000

Delivered by

Sharpness Development LLP - a partnership between Lioncourt Strategic Land (Sharpness) Limited, a wholly owned subsidiary of Lioncourt Homes Limited and GreenSquare Homes Limited, a wholly owned subsidiary of Green Square Group. The purpose of the Sharpness Development LLP is:

Types of homes and tenures

Our ambition is to create vibrant and inclusive communities through the delivery of a wide range of dwellings sizes, types and tenures in order to accommodate a variety of household types. This will include much needed affordable housing incorporating a mix of social and affordable rent, shared ownership and starter homes which are genuinely affordable for young first-time buyers. It will also include homes to downsize, homes with an element of care and family homes with space-standards that allow families to grow.

Employment

Number of jobs created

650

Approx. area of employment space (ha)

12.5

Key types of jobs created

Sharpness Eco-Village will provide long term direct employment opportunities through the proposed employment space, district centre and local food market and retail centres creating connected, flexible and integrated spaces. A breakdown of likely job sectors is set out below:

- Use Class B1c – likely to be in the form of workshop units and small scale offices for new and existing businesses.
- Use Class B2 – small scale industrial premises.
- Use Class B8 – storage and distribution.
- Use Class A1 – main food store as well as some smaller retail units
- Use Class A3 – small scale food/drink provision such as café/coffee shop
- Use Class D1 – the provision of new schools will create new jobs in the education sector

Employment would also be generated from the construction of the development and associated infrastructure. There is also a great opportunity to promote ‘green tourism’ as part of the proposals economic benefits given the close proximity to Sharpness Docks and Marina, and Gloucester and Sharpness Canal to the proposed village. It is envisaged that the 10.2 hectares of employment land proposed will predominately consist of a mix of B8, B1c and B2 uses to complement the existing employment uses in the area including Sharpness Docks and the Severn Distribution Business Park which already encompasses B2 and B8 uses. This has the ability to generate approximately 548 jobs in total in the B8, B1c and B2 sectors based on the Homes and Communities Agency Employment Densities Guide (2015). Further employment space is envisaged in small clustered satellite areas within the neighbourhood centre and residential areas including commercial and retail jobs. A further 2.3 hectares of employment land is also proposed post plan period subject to further assessment of likely demand/end users, therefore the proposals have the possibility of generating even more employment in the future and a total of 12.5 hectares of employment space.

Approx. area of retail / commercial space (ha)

0.5

Community Infrastructure

Number of schools

3

Types and size of schools (if known)

x 2 new primary schools (2 ha each) as well as allowance for x 1 secondary school (7 ha) and allowance for the expansion of the existing Sharpness primary school.

Number of health and care facilities

1

Types and size of health and care facilities (if known)

At this stage, it is considered the proposals could provide up to 1,200 sq m of community and healthcare facilities. At this stage, it is anticipated approximately 1 health care facility could be proposed.

Number of community facilities

1

Types and size of community facilities (if known)

At this stage, it is considered the proposals could provide up to 1,200 sq m of community and healthcare facilities. At this stage, it is likely a village hall/community centre would need to be provided. The open space provided will also form an extensive community facility.

Number of district and local centres

7

Site Space

Approx. area of site space (ha)

229

Approx. area of green space (ha)

64

You will be asked at the end of the form to provide evidence of the following:

- **Location Plan** - One or more plans showing the location of the proposed garden community outlined in red. It should also indicate the location of any nearby communities/development, and the boundaries of the Local Planning Authority, County Council, LEP. Include site boundary coordinates. This plan should also highlight the extent of brownfield conditions on the site, if relevant.
- **Strategic Framework Plan** for the proposed garden community – this should show: the broad disposition of proposed land uses and major infrastructure proposed.
- **Annual housing trajectory** for the garden community

2. If 10,000 or fewer homes are proposed, please provide details of the circumstances that you believe make the proposal suitable for consideration (refer to paragraph 5 of the prospectus)

Exceptional quality or innovation

We see the regeneration of Sharpness for a new eco village following garden city principles, as a once-in-a-lifetime opportunity for Stroud District; an opportunity to properly plan and deliver a new sustainable, self-contained and thriving settlement that offers the best of town and rural living. Sharpness is rich in history and character, and ripe with possibility. Best of all, the scale of the opportunity is matched by the scale of our ambition; a thriving community with places to work, play, socialise, shop and learn.

We wish to build on the core principles that define a Garden City and adapt them for contemporary living at Sharpness; good employment prospects, relative wealth for its inhabitants and good communications and merge it with the best elements of the countryside; a healthy and affordable setting.

Sharpness has a unique character and is rich in history, it is an area relatively unconstrained which offers many opportunities. Sharpness is a privileged location for growth in which the demand for housing within the plan period and beyond can be addressed in a sustainable manner.

Sharpness has the potential to challenge existing ways of working and thinking to push the boundaries of residential led design quality to create a series of interlinked neighbourhoods, building on the principles of sustainability to create a new eco village.

One of the main objectives is to create a recognisably high quality and sustainable development that people will aspire to live and invest in, with a vibrant mix of uses and a real 'sense of place', using the opportunities presented by existing landscape features as well as creating outstanding new spaces. Sharpness Eco-Village will assimilate development into the landscape being both a place people choose to live and work in, but also a place people can enjoy visiting.

New places will be designed to be inclusive of all users and will encourage walking and cycling as the principal modes of transport (car users will be secondary to pedestrians and cyclists). Its location makes the future development ideal for the provision of safe and accessible 'green' route networks that will connect residential areas with areas of employment, education, shopping and leisure, thereby reducing carbon emissions and environmental impact.

Energy efficient building methodologies, systems and equipment will support the sustainable use of energy throughout the lifetime of the buildings that comprise the Sharpness Eco Village. The energy hierarchy will be adopted to apply lean, clean and green energy conservation principles to the scheme to contribute to an energy efficient, low carbon design strategy. We are also currently exploring how an Energy Centre can be provided including a mixture of high efficiency gas fired boilers, Combined Heat and Power (CHP) engines and potentially additional renewable technologies. CHP engines turn fuel (i.e. natural gas) into electricity and generate heat as a by-product. This heat is captured to heat water and supply building heating systems. CHP plant can reduce carbon dioxide emissions by 30% compared to a conventional gas fired boiler system. There is scope for capacity to be built into this energy centre to serve existing buildings in vicinity of the scheme in addition to the new scheme- providing a tangible benefit to the surrounding area.

Overall, Sharpness eco village will be a planned, balanced and self-contained community. The intention will be for the village to grow in the future in a logical and sustainable manner benefiting from the new infrastructure created by the initial development. In this way, the District will have a concentrated growth point for its future.

Will the proposals provide a significant contribution to closing the housing supply gap?

Under the standard housing method, Government requires the Stroud District Local Plan Review to provide for at least 603 new homes per year (based on the latest 2016 household projections), or at least 638 new homes per year (based on the previous 2014 household projections). Either way, this requires a 32% to 40% increase on the figure in Stroud District Council's current Local Plan of 456 homes per year.

To meet this new challenging target every year over a 20-year period will require the Local Plan Review to identify land for at least 12,800 new homes. Currently, 7,100 new homes have received permission or are already identified in the current Local Plan and Stroud District Council needs to identify land for at least 5,700 homes to meet this target.

Delivering a new settlement at Sharpness provides the opportunity to deliver at least 2,400 of these new homes by 2040 – or over 40% of the additional growth required. If growth can be accelerated even further, through economies of scale, innovative design and construction solutions, early delivery of infrastructure and new delivery vehicles, there is the opportunity to deliver greater levels of growth than currently envisaged in the emerging Strategy.

In addition, Stroud District Council currently also has an overall unadjusted need for 446 affordable dwellings per annum. However, between April 2016 and March 2017 only 124 dwellings were delivered and from April 2017- March 2018 only 119 affordable homes were delivered. However, GreenSquare Group forms part of Sharpness Development LLP and are registered providers of affordable housing with a strong track record of delivering high quality affordable homes. **The proposals therefore offer a great opportunity to deliver the affordable homes that the District needs compared to what is often delivered on a private sector led market scheme.**

Beyond 2040, Sharpness offers real potential to deliver a significant proportion of future growth requirements for the District, building upon the solid foundation of infrastructure-led growth during the next plan period. As such, for Stroud, the proposals at Sharpness have the potential to make a very significant contribution to closing the housing supply gap both now and in the future. We feel that assistance from Homes England as part of the Garden Communities programme can help us to ensure the timely delivery of growth and its associated benefits is achieved.

An area of particularly high housing demand

Stroud District is an area of high housing demand. The latest affordability ratio between income and house prices in Stroud District is 8.8 – one of the highest levels in the South West which is a major factor in driving the future housing requirement in the District using the new standard method.

The latest ONS data from August 2018 in relation to house prices (UK House Price Index England: August 2018) identifies that in Stroud District the average house price is £288,862. This is compared to an average of £249,748 for England as a whole, and £266,713 for Gloucestershire as a whole.

Under the standard housing method, Government also requires the Stroud Local Plan Review to provide for at least 603 new homes per year (based on the latest 2016 household projections), or at least 638 new homes per year (based on the previous 2014 household projections). Either way, this requires a 32% to 40% increase on the figure in Stroud's current Local Plan of 456 homes per year.

Delivering a new settlement at Sharpness provides the opportunity to deliver at least 2,400 of these new homes by 2040 – or over 40% of the additional growth required. If growth can be accelerated even further, through economies of scale, innovative design and construction solutions, early delivery of infrastructure and new delivery vehicles, there is the opportunity to deliver greater levels of growth than currently envisaged in the emerging Strategy.

From Stroud District Council's perspective, the proposals at Sharpness also offers the opportunity for **a housing partnership to deliver a greater proportion of affordable housing than would normally be delivered through a private sector led market scheme.**

An ability to expand substantially further in the future

As identified on the accompanying site location plan and land ownership plan, we are confident that Sharpness Development LLP can deliver 2,400 dwellings over the plan period up to 2040. However, we are also confident that there is going to be a significant opportunity to expand substantially beyond this in the future to around 5,000 dwellings as shown by the land highlighted in blue on the site location plan ensuring that Sharpness becomes a new sustainable location for growth in the District.

We see the proposed development as a catalyst for the wider consideration of infrastructure and growth by Stroud District Council and also neighbouring local authorities, such as Forest of Dean District Council. **The proposals at Sharpness could, for example, help to facilitate pioneering proposals for a new Severn River Crossing by re-establishing the former rail line crossing or provide a new crossing (or possibly both).** With the river crossing, the potential for Stroud and Forest of Dean to collaborate on a new settlement, with housing and employment delivery advantages to both could be explored.

The plan produced by the local economic partnership gFirstLep, sets out a clear vision and strategic priorities for delivering future economic growth in Gloucestershire and this crossing could help to achieve those goals. Cross-estuarine connectivity would be extremely advantageous for the local economy – with new employment opportunities, and benefits to the existing commercial activity in the area. This could also provide the potential for growth and consolidation of dock related activity – helping to secure the future of the docks as river-front development at Sharpness.

Whilst the new settlement can be proposed and delivered without the need for the river crossing and it would be difficult for the proposed development of c. 5,000 homes to deliver this itself due to infrastructure costs, we see that this could create a unique opportunity for the cross-river authorities to take what may be a once-in-a-lifetime chance to do something remarkable that could have significant economic and social benefits for both authorities and Gloucestershire as a whole. Sharpness Development LLP is pleased to work with the authorities to develop this comprehensive vision further, alongside the masterplan vision for the settlement. However, we feel that the input of Homes England in this regard could also be valuable to potentially trying to achieve this vision.

3. Question not required as your proposal is for 5,000 or more homes.

4. Is the proposed garden community a free-standing or transformational garden community?

Transformational

5. In the case of proposals for transformational garden communities where substantive additional growth is proposed to an existing place, please outline the economic, social, and environmental outcomes you expect the proposal to achieve for the place as a whole.

We consider the proposals would constitute a transformational garden community for the following reasons:

The land at Sharpness is currently surrounded by small villages and hamlets such as Newtown, Wanswell and Old Brookend and Brookend. These settlements are relatively isolated and have limited services and facilities available. The proposals will provide significant economic, social and environmental benefits to these existing settlements through the provision of new green infrastructure, transport infrastructure, community facilities, shops, education facilities and employment.

The Sharpness docks and working port are also directly to the north of the proposals. The docks and working port are currently managed by the Canal and River Trust and Sharpness Dock Ltd facilitating commercial vessel movements (including cargoes of dry bulks).

A planning application is also under consideration at the Docks for the regeneration of the part of the site for a mix of uses including up to 300 dwellings (C3), industrial and distribution development (B1c,B2,B8) on 6.6 hectares of land 2 no. marinas, up to 1250m² of ancillary retail / food and drink uses (A1,A2,A3 and A4) up to 7,000m² of commercial floor space (B1 office/light industrial of which no more than 4300m² to be B1 office), up to 100 holiday lodges/camping pitches, hotel, public open space, landscaping, visitor parking, new access road and associated infrastructure (reference: S.17/0798/OUT). The site currently forms an allocation in the existing Local Plan for a mixed use development of this nature.

Furthermore, recent existing projects such as the GREEN project at nearby Berkeley power station is also a key Strategic Economic Project (SEP) project, where the LEP, in partnership with South Gloucestershire and Stroud College, is establishing a Gloucestershire centre of excellence in Renewable Energy, Engineering & Nuclear skills which will be a focus for growing research, training and economic development at the site. Initial discussions have already identified the potential for additional college and employment provision as part of the new settlement to support the continued growth of this project and to help ensure its viability for the future.

The proposals at Sharpness would therefore also help to complement and support the delivery of both existing local plan allocations and existing development projects within close vicinity of the proposals for a new eco village at Sharpness.

Economic

The Home Builders Federation Housing Calculator estimates that a development of 5,000 dwellings could support:

- the employment 15,500 people and 170 apprentices, graduates or trainees;
- increase open space, community sport, leisure spending by £4,031,000;
- generate £4,031,000 towards education spending which could provide up to 1,900 classroom spaces; and
- Generate £60,265,000 in tax revenue including £5,647,300 in council tax revenue.

The proposals also have the potential to create around 1,500 new affordable homes.

The development of a major new settlement at Sharpness will also require significant additional transport infrastructure to be provided – and at the same time could open up the opportunity for further growth and connectivity to be delivered with the new settlement as a catalyst. It would be a significant means of facilitating infrastructure proposals that would reset the potential of the area for the future.

New employment opportunities would be provided as a result of the 10 ha of employment land proposed with benefits to the existing commercial activity already occurring in the area. There is also potential for the proposals to support and enhance the leisure and tourist economy creating the area as a destination. It could also help with the growth and consolidation of dock related activity – help to secure the future of the docks as river-front development.

A significant new settlement at Sharpness could help to facilitate a new Severn River crossing. With the river crossing, the potential for Stroud and FoD to collaborate on a new settlement, with housing and employment delivery advantages to both could be explored. Furthermore, the proposals will also result in economic benefits for recent existing nearby projects. For example, the GREEN project at nearby Berkeley power station is also a key Strategic Economic Project (SEP) project, where the LEP, in partnership with South Gloucestershire and Stroud College, is establishing a Gloucestershire centre of excellence in Renewable Energy, Engineering & Nuclear skills which will be a focus for growing research, training and economic development at the site. Initial discussions have already identified the potential for additional college and employment provision as part of the new settlement to support the continued growth of this project and to help ensure its viability for the future.

Environmental

Energy efficient building methodologies, systems and equipment will support the sustainable use of energy throughout the lifetime of the buildings that comprise the Sharpness Eco Village. The energy hierarchy will be adopted to apply lean, clean and green energy conservation principles to the scheme to contribute to an energy efficient, low carbon design strategy.

Lean

In the first instance, passive measures will be adopted to reduce the demand for energy. A fabric first approach will include measures to reduce winter heat losses such as thermally efficient building fabric elements (low U values), air tight construction techniques and the use of accredited details to reduce the effects of thermal bridging. Where building services systems will be required to heat/ cool/ ventilate/ light spaces they will be specified to have efficiencies exceeding the minimum requirements stipulated in the Building Regulations.

Clean

A decentralised energy centre is proposed for the Sharpness Eco Village to provide heating and power. At this stage, it is proposed that the Energy Centre will include a mixture of high efficiency gas fired boilers, Combined Heat and Power (CHP) engines and potentially additional renewable technologies. There is scope for capacity to be built into this energy centre to serve existing buildings in vicinity of the scheme in addition to the new scheme- providing a tangible benefit to the surrounding area.

Green

The feasibility of a number of renewable technologies are currently being explored through discussions with local green energy provider, Ecotricity:

- Photovoltaic (PV) Panels
- Wind Turbines

- Water Turbines
- Heat Pumps

Furthermore, the site represents a significant opportunity to deliver strategic tangible (District-level) biodiversity gain, ensuring compliance with local and national planning policy, for example:

- A significant opportunity to provide an extensive area of SANG in the south-west of the Site, to accommodate increased visitor numbers and create new Priority Habitats;
- A committed sum contribution to a pre-identified enhancement project along the estuary in line with Habitat Regulations Assessment and Stroud District Council's Strategic Mitigation Strategy for the Severn Estuary;
- Opportunities for significant habitat enhancement and creation, including creation of an extensive network of interlinked semi-natural greenspace, providing a network of wildlife 'corridors' through the site that will be of high wildlife and amenity value.

The integration of sustainable design measures will be a key strategic principle embedded into Sharpness Eco Village. There are various sustainability assessment and benchmarking schemes that are available to aid in informing the development of sustainability strategies for developments. Particular attention, however, will be paid to the Building with Nature scheme as this is a locally developed initiative which has come about through collaboration between Gloucestershire Wildlife Trust and the University of the West of England therefore it is particularly relevant to the proposed development area.

Social

The ethos of the proposals is to develop strong, vibrant and healthy communities. The village will provide the supply of housing needed to meet the needs of present and future generations.

Delivering a new settlement at Sharpness provides the opportunity to deliver at least 2,400 of these new homes by 2040 – this equates to over 40% of the additional growth required in Stroud District up to 2040 as a result of the Government's standardised housing requirements.

Beyond 2040, Sharpness offers real potential to deliver a significant proportion of future growth requirements for the District, building upon the solid foundation of infrastructure-led growth during the next plan period. As such, for Stroud, the proposals at Sharpness have the potential to make a very significant contribution to closing the housing supply gap both now and in the future.

However, the proposals at Sharpness will not only provide a significant supply of housing required to meet the needs of present and future generations but will create a high quality built environment, with accessible local services through sustainable transport measures including a network of new and enhanced cycling, walking and public transport networks and provision of a significant amount of Green Infrastructure. In addition, the proposals could help to facilitate a new Severn River crossing and support existing recent existing nearby projects in the area such as the GREEN project at nearby Berkeley power station as identified earlier, both of which would result in strong social benefits as well as economic.

You will be asked at the end of the form to provide evidence of support for your proposal from the following:

- a) **Local MP(s)**
- b) **Local community**
- c) **Local Enterprise Partnership(s)**
- d) **County Council** (where relevant)
- e) **Neighbouring local authorities**
- f) **For private sector led** – the relevant local authority
- g) **Any other key stakeholders**

You will be asked to answer 'Yes', 'No', or 'Awaiting Response.' If 'Yes' is selected you will need to provide details of engagement and attach relevant evidence. If 'No' or 'Awaiting Response' is selected you will need to provide reasoning.

Strategic Approach

6. Provide a statement on how the proposed garden community fits with local or area housing and economic plans & strategies; how it will meet anticipated population growth both within the relevant Local Plan period and beyond; and how it will address local housing affordability issues.

a) How it fits with local housing and economic plans and strategies

Gloucestershire 2050 Vision

This is a county-wide conversation to explore ideas and shape the long term future for Gloucestershire. It is supported by Leadership Gloucestershire and the University of Gloucestershire. The initial ideas have included the development of a new Lydney-Sharpness crossing of the Severn Estuary to provide a catalyst to grow the town of Lydney and to develop Sharpness from a small village to a town. It would improve their links to existing transport routes through the county, and create a re-energised economic centre. As a result of public consultation during 2018, a Concordat has now been prepared for the local authorities and other partners to sign up to which includes a vision for Gloucestershire and proposals for the development of a series of delivery boards. One of the proposed delivery boards is now focussed on delivering a new Severn crossing which "would create stronger links between the Forest of Dean and Stroud districts, and even Gloucester, but beyond that it would connect much of England to South Wales in a new way that takes pressure off the M4 and M5. The local dividend will be the potential for new communities and economic growth based on the ambitions set out in the Vision. The Severn Vale Board should aim to seize the potential to make this part of the county not just a destination in its own right but also a new gateway to South Wales and critical to the operation of South Wales, the West of England, and the West Midlands."

The Strategic Economic Plan for Gloucestershire

This plan, produced by the local economic partnership gFirstLep, sets out a clear vision and strategic priorities for delivering future economic growth in Gloucestershire. The plan promotes a Gloucestershire growth zone to deliver quality employment land in proximity to the M5 motorway attractive to businesses. To deliver this project, a growth programme has already delivered road improvements along the A38 to support employment expansion at Sharpness Docks and to improve access to the nearby GREEN project at Berkeley power station. Further employment and housing growth at Sharpness with supporting infrastructure will be fully in accordance with this growth zone focus and will extend it to unlock new potential.

The GREEN project at nearby Berkeley power station is also a key SEP project, where the LEP, in partnership with South Gloucestershire and Stroud College, is establishing a Gloucestershire centre of excellence in Renewable Energy, Engineering & Nuclear skills which will be a focus for growing research, training and economic development at the site. Initial discussions have already identified the potential for additional college and employment provision as part of the new settlement to support the continued growth of this project.

The Local Plan

The adopted Local Plan includes within it a vision for the regeneration of Sharpness Docks with a tourism and leisure led strategy for the north of the docks and intensified and upgraded employment provision to the south. The plan includes an allocation at Sharpness Docks of 300 dwellings, 7 ha of employment land and tourism-led regeneration. An adjacent site is also allocated for an additional 9.8 ha of employment land. The Council is actively working with the Canal and Rivers Trust and a local business to bring these sites forward.

The Local Plan Review emerging strategy seeks to build on this regeneration focus to develop an exemplar new settlement which will meet the housing and employment needs of the District whilst also delivering a step change in services and facilities available in the local area and existing communities of Berkeley/Newtown/Sharpness/Wanswell. The mini-vision for this area included within the plan states: "Following Garden City principles, the mix of uses, design quality and accessible layout within a green setting will deliver a truly sustainable pattern of living for new and existing local residents."

b) How it will meet anticipated population growth

Under the standard housing method, Government requires the Local Plan Review to provide for at least 603 new homes per year (based on the latest 2016 household projections), or at least 638 new homes per year (based on the previous 2014 household projections). Either way, this requires a 32% to 40% increase on the figure in Stroud's current Local Plan of 456 homes per year.

To meet this new challenging target every year over a 20 year period will require the Local Plan Review to identify land for at least 12,800 new homes.

Currently, 7,100 new homes have received permission or are already identified in the current Local Plan and so we need to identify land for at least 5,700 homes to meet this target.

Delivering a new settlement at Sharpness provides the opportunity to deliver at least 2,400 of these new homes by 2040 – or over 40% of the additional growth required. If growth can be accelerated even further, through economies of scale, innovative design and construction solutions, early delivery of infrastructure and new delivery vehicles, there is the opportunity to deliver greater levels of growth than currently envisaged in the emerging Strategy.

Beyond 2040, an eco village at Sharpness offers the potential to deliver a significant proportion of future growth requirements, building upon the solid foundation of infrastructure-led growth during the next plan period. However, with the assistance of Homes England as part of the garden communities programme it is considered there could even be potential to deliver further growth during the plan period.

c) How it will address local housing affordability issues

As set out earlier, Stroud District is an area of high housing demand. The latest affordability ratio between income and house prices in Stroud District is 8.8 – one of the highest levels in the South West which is a major factor in driving the future housing requirement in the District using the new standard method. The Sharpness new settlement is being jointly promoted by Registered Affordable Housing Provider, Green Square Group, which has a long and successful track record of delivering high quality homes for those on low incomes. The proposals therefore provide an exciting opportunity for the District to really deliver the affordable housing needed.

As an experienced affordable housing enabler with a strong track record of delivery as well as being a stock retention authority, the District Council has also recently been successfully building council housing (over 220 since 2013) to meet local affordable housing needs and has recent experience of joint venture partnerships with the private sector to bring forward market and affordable homes. The Council would like to explore opportunities to deliver further council houses signalled by the Government's decision to remove the HRA borrowing cap.

From Stroud District Council's perspective, the proposals at Sharpness also offer the opportunity for a housing partnership to deliver a greater proportion of affordable housing than would normally be delivered through a private sector led market scheme.

d) How it will provide and embed opportunities to expand further in the future if required

The Gloucestershire Vision 2050 project (see above) identifies the ambitions for delivering a new Severn estuary crossing and developing the concept of a linked new community, creating new growth opportunities both at Sharpness and across the bridge at Lydney in Forest of Dean.

The development of an eco village at Sharpness could be expanded in the future onto adjacent land if this longer term vision were to be developed further. The site at Sharpness is not constrained by adjoining land uses and there is potential for further land to become secured as part of a longer term vision.

The development of a major new settlement at Sharpness will require significant additional transport infrastructure to be provided – and at the same time could open up the opportunity for further growth and connectivity to be delivered with the new settlement as a catalyst. It would be a significant means of facilitating infrastructure proposals that would reset the potential of the area for the future.

Sharpness Development LLP is already actively engaging in discussions with neighbouring landowners to consider how further expansion can be realised in the future.

Local Leadership

7 a) Set out the extent of community engagement undertaken to date in respect of the garden community. This should include any engagement with key local stakeholders, for example, Sustainability and Transformation Partnerships, LEPs, energy district network operators, etc.

Stakeholder engagement to date

Sharpness Development LLP is keen to ensure that such a significant project has comprehensive stakeholder engagement at every level. Whilst the proposal is still in its infancy, but maturing rapidly, there has already been engagement with local residents, Parish Council and District Councillors by the client team.

When the concept of a Garden Community within Stroud District was first conceived as part of the Local Plan Review following a series of representations to the Council, a Council led initiative brought landowners and stakeholders together to discuss how the project could be successfully delivered. As a consequence, Sharpness Stakeholder meetings have been organised and run by Stroud District Council's chief executive since February 2017. These meetings are held in the Council chambers approximately twice a year to discuss the proposals and the future for Sharpness and Berkeley Area. The meetings provide the opportunity to discuss progress with concept plans and to exchange information on current and future projects in the area such as the current planning application at Sharpness Docks referred to earlier as well as the emerging proposals and work undertaken for a new eco village at Sharpness. Participants of these stakeholder meetings have included Officers from Stroud District, representatives from Sharpness Development LLP, as well as a variety of local businesses, local councillors, local education providers and other key stakeholders including:

- The Canal and River Trust
- Gloucestershire Local Enterprise Partnership (LEP)
- Gloucestershire County Council
- Sharpness Docks Ltd

- Howard Tenens
- Vale of Berkeley Railway

In addition to the above, Sharpness Development LLP has been involved in direct engagement with a number of key stakeholders on an individual basis. Meetings have been held, for example, with the Vale of Berkeley Railway to discuss their aspirations to bolster tourism in the local area and the existing rail connectivity potential.

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Stroud District Council and Sharpness Development LLP have also engaged in discussions with the Local MP, David Drew to discuss the sustainable merits of the proposal in the future development of the District. An initial meeting has been held between Stroud District Council in which the MP has identified broad support for the proposals at Sharpness, indicating that there is scope to develop a sustainable Garden Community within the District that helps deliver an inclusive community.

Further engagement has been had with GFirst LEP. GFirst LEP was established in 2011 as one of 38 Local Enterprise Partnerships in England. In partnership with the county's business community and the public and voluntary sectors, GFirst LEP has worked to ensure that Gloucestershire's economy keeps growing. The LEP is simply looking to ensure that Gloucestershire is the best place in England for business. The LEP recognises that Sharpness is located within the 'Growth Zone' (as defined in the Strategic Economic Plan for Gloucestershire [SEP]) and accordingly planned economic growth is welcomed by the LEP. The LEP recognise that the proposals at Sharpness will help deliver modern accessible employment land as part of the development, which will be supported by a new workforce in situ. As identified throughout this submission, the proposals at Sharpness will also deliver regeneration and visionary transport initiatives that cannot be delivered elsewhere. For these reasons, the LEP is supportive of the proposal at Sharpness for a new eco village.

b) How do you intend to engage with local residents and stakeholders about the garden community proposal in the future?

Community Engagement to date

In terms of public consultation and community engagement, Stroud District Council undertook an initial round of public consultation on its Issues and Options as part of the first stages of the Stroud Local Plan Review. The consultation took place over a period of eight weeks from 11th October 2017 until 5th December 2017. It included 10 public exhibitions across the District during October and November 2017 and provided the opportunity for comments to be made on the general preferred strategy for development in the District as well as how to plan to meet local needs for jobs, housing, green spaces and community facilities. Meetings were also held with Town and Parish Councils in each of the 8 parish clusters to view the public exhibition information and vote on the growth strategy options.

As a result of that consultation, the Emerging Strategy was prepared identifying provision for a new settlement at Sharpness, following garden village principles, for the delivery of 2,400 dwellings and 10 hectares of employment land up to 2040. This Strategy has now been signed off for consultation at the Council's October Environment Committee and a further round of public consultation will begin on this in November for 12 weeks.

Vision Document

Sharpness Development LLP has also produced a comprehensive Vision Document in support of the proposals. That document is intended for public circulation, to inform local residents of our vision, the wider sustainable benefits of the proposal as well as giving an indicative timetable on delivery. The vision document has been circulated widely amongst District Councillors, stakeholder groups and local residents to ensure that there is an understanding from the outset of why new development is needed and how such development can be beneficial in enhancing the sustainability of our everyday lives.

As set out above, Sharpness Development LLP consider that successful community engagement is an integral part of the successful delivery of a Garden Community within Stroud District. The client team in conjunction with the Council therefore intend to engage in two separate ways:

1. Creating a Community Liaison Group; and
2. Establishing a robust communication strategy in conjunction with JBP Communications.

Community Liaison Group

A Community Liaison Group (CLG) will be formed which will comprise of major community stakeholder groups within the local area. Generally, this will comprise of the developer team, the local planning authority, District Councillors, the Parish Council and/or community groups and local business representatives.

The group will be designed to help shape and deliver the Garden Community within an agreed timeframe to ensure that all stakeholders are able to understand the benefits of development and how the local community can positively engage with the process.

Meetings of the CLG will be held regularly and will discuss technical and non-technical issues. Professional guests will be invited to such meetings in order to inform the CLG on any detailed issues and how these can be addressed. Matters will cover all aspects of the Garden Community including ecology, sustainable transport, infrastructure, energy and heating, education, health, shopping, housing, employment, future growth and regeneration, to name a few. Blueprints for growth will be developed and shaped with the group and will help provide a template for the developer to respond to. The Blueprint will be refined within the life of the CLG and will eventually help shape detailed policy for the site

8. Where a proposed garden community is cross-boundary or located close to the boundaries of neighbouring authorities, describe the type and level of local authority co-operation and joint working taking place.

Whilst Sharpness is not immediately on the border with South Gloucestershire, the Council is actively working with South Gloucestershire Council to co-ordinate plan-making activities across administrative boundaries. In the immediate context of the West of England Joint Spatial Plan, a Statement of Common Ground has recently been signed by planning managers from both authorities which summarises the nature of existing co-operation and how we will work closer together in the future. Growth proposals in South Gloucestershire and in Stroud District will rely on significant new infrastructure including highway junction improvements at M5 J14, A38 and other roads within the strategic network, developing additional rail capacity on the Bristol-Birmingham line and extending the MetroWest bus corridors from Bristol into Gloucestershire. These projects all involve developing joint working between South Gloucestershire, Gloucestershire County Council and Stroud District Council. Officer working is on-going and includes regular meetings, sharing data, developing joint statements.

and as well as an eventual planning application.

Communications Strategy

A comprehensive, detailed engagement strategy will also be developed in conjunction with Stroud District Council and a strategic communications consultancy (JBP). This work will be undertaken in tandem with the formation of the CLG. Sharpness LLP intend to invest substantial resource into the development and execution of an engagement strategy in line with a key set of principles described below.

Principles informing our strategy

- Robust assessment of our stakeholders; In tandem with Stroud District Council, this process will help to determine key organisations and people who are best placed across the existing local community and future residents and businesses in Stroud District Council (and potentially beyond) to provide valuable insights into the Sharpness proposal;
- Encouraging two-way engagement; Engaging residents and stakeholders will be a two-way conversation process. Sharpness Development LLP will proactively seek views about our garden community proposal and, encourage people to shape the ideas;
- Communicating conversation outcomes; It is important to inform residents and stakeholders about how their contributions to the conversation process have influenced our proposals. At key junctures of our engagement timeline, Sharpness Development LLP will issue a 'You said, we did' communication to explain how representations have been addressed; and
- Open and accessible to all; It is accepted that not everyone will want to position themselves at the forefront of learning more about and shaping the proposals. But we will keep the wider community informed as the proposals develop through accessible communication channels outlined in the next section. This principle includes creating an action plan to engage with 'hard to reach' groups, such as young people and disabled people.

Engagement strategy in action

General communication

These channels will ensure that residents and stakeholders are kept fully informed about the proposal and opportunities for involvement/engagement throughout the process over and above the work conducted through the CLG. This is not intended to be an exhaustive list, as the comprehensive engagement strategy will identify the channels most likely to extend our reach to residents, future residents, businesses and other stakeholders.

- Sharpness Eco Village website; this will become the 'one stop shop' for information, images and the means to submit general views and comments to the project team. We will use drone technology to develop a 3D interactive landscape of the development so that we can 'show, not tell' people about the environmental benefits of the plans;
- Project E-Newsletter; we will proactively issue timely communications about opportunities to shape our development, updates and the evolution of our proposal. This will be a suitable medium to communicate generally our 'You said, we did' reports;
- Third party channels; existing communication methods which the community rely upon to receive their information will also be utilised, for example the Stroud District Council weekly e-newsletter and SDC News, which is circulated to every household in the district;
- Community information sources; the town and parish councils impacted by our proposals maintain traditional and digital channels, such as Berkeley Town Council who have a Facebook Page, which with approval, will be used to engage stakeholders.;
- Media relations; Sharpness Development LLP will also develop relationships with the local media, such as the Stroud News and Journal, to

highlight opportunities for the community to attend community engagement opportunities.

Wider community engagement

This communication will represent the basis upon which Sharpness Development LLP will engage generally with residents and stakeholders after discussions and proposals have been agreed with the CLG. The feedback would either:

- i) Be considered for incorporation into our proposals;
- ii) Be considered in-depth as part of the focused two-way engagement process at a future workshop.

The methods of wide community engagement could be as follows, although will be finalised in our comprehensive engagement plan in tandem with Stroud District Council:

- An initial public exhibition to present ideas and seek views from the local community will be held following the end of the Council's consultation on the Emerging Strategy; and
- Continued Sharpness Stakeholder Engagement meetings at Stroud District Council.

Outcome of our strategy

- i) At the point of submitting our planning application, we want residents and stakeholders to feel that they have had a meaningful opportunity to shape the future of this new and exciting Garden Community that will support Stroud District and Gloucestershire County to thrive and grow;
- ii) Our proposals for a Garden Community will be as representative as possible of the needs and aspirations of the existing Sharpness community, and of those who we will encourage to make our development their home in years to come;
- iii) Our engagement strategy will be considered as an exemplar of Garden Community engagement with residents and stakeholders that can be used as a case study by the Ministry of Housing, Communities and Local Government.

Garden Community Vision

9 a) Set out the vision and key development objectives for the proposed garden community. Highlight how the garden community will address the qualities set out in the Prospectus, and any other principles considered important.

a. Clear identity

Our vision for Sharpness is to create a highly desirable, new self-contained settlement connected with nature and seamlessly integrated into the landscape. The underlying aim is to achieve a healthy, energy-efficient, high-quality, self-contained development with a strong identity, sense of community and 'sense of place'.

Sharpness eco village will connect nature, heritage and sustainable design across separate distinct neighbourhoods linked by green corridors, cycle paths and bus routes. The ambition is for a unique place that locates energy efficient buildings within a continuous natural landscape made up of ecological habitats, nature reserve, riverside landscape, new green spaces, parks, allotments and sports facilities.

Lying midway between Thornbury and Gloucester and in-between the M5 and the River Severn, the site offers an exciting opportunity to create a new, high-quality and vibrant place where people want to live co-existing with nature and the landscape. The development will create a distinct development character of personal scale and the place will become an aspirational destination for education and work.

A wide range of residential properties will be delivered at a range of densities to ensure all forms of housing need, including provision for both young people and the elderly will be efficiently met.

The new village will be designed to be inclusive of all users, encourage environmentally sustainable travel choice and promote healthy lifestyles.

The integration of sustainable design measures will be a key strategic principle embedded into Sharpness eco village. There are various sustainability assessment and benchmarking schemes that are available to aid in informing the development of sustainability strategies for developments which we are considering. Particular attention, however, will be paid to the Building with Nature scheme as this is a locally developed initiative which has come about through collaboration between Gloucestershire Wildlife Trust and the University of the West of England therefore it is particularly relevant to the proposed development area.

Sharpness eco village is more than just a development; it will offer benefits to the wider community, be designed to the latest design guidance and be driven by current best practice in minimising energy consumption. The new village will be an exemplar for new, large scale development.

b. Sustainable Scale

Sharpness eco village will be a planned, balanced and self-contained community. However, the intention is also for the village to grow in the future in a logical and sustainable manner benefiting from the new infrastructure created by the initial development.

The development of a major new settlement at Sharpness will require significant additional infrastructure to be provided – and at the same time could open up the opportunity for further growth and connectivity to be delivered with the new settlement as a catalyst that would reset the potential of the area for the future as a new sustainable location for growth in the District.

A development of this scale would be able to provide a comprehensive pedestrian, cycle and public transport offer to ensure sustainable travel is a viable option for the proposed development. The proposed development will include an integrated network of pedestrian and cycle routes as well as public transport services connecting the new development with the existing settlements of Berkeley, Cam and Dursley.

A development of this size will facilitate improvements to the bus provision in this area, benefitting residents of the proposed development and the existing settlements of Sharpness, Newtown, Brookend, Wanswell and Berkeley. There are two potential options for a fixed route bus service to serve the proposed development including, improving the level of service and rerouting the existing Stagecoach 62 service into development site, and/or a new service which could provide a link between the new and existing villages, local centres and employment opportunities.

The provision of 10 hectares of new employment space and the provision of new education facilities will also assist in creating a community with a self-contained environment where the need to travel will be considerably reduced, thereby providing a live-work-play lifestyle.

c. Well-designed places

One of the main objectives is to create a recognisably high quality development that people will aspire to live and invest in, with a vibrant mix of uses and a real 'sense of place', using the opportunities presented by existing landscape features as well as creating outstanding new spaces

Sharpness has the potential to challenge existing ways of working and thinking to push the boundaries of residential led design quality to create a series of interlinked neighbourhoods, building on the principles of sustainability to create a new eco village.

The concept is based upon the provision of an innovative and sustainable central community centre around the area of the future railway station and next to the employment area. This will be the main mixed use centre with a broad range of facilities such as:

- Retail - including a main food store and smaller retail units;
- Market – with locally sourced fresh vegetables and products;
- Employment - likely to be in the form of workshop style units and small scale offices;
- Leisure, Health and Community Facilities e.g. Doctor's surgery, community building and sports facilities.

Additional neighbourhood centres will be located within residential areas in order to create a walkable place. These smaller local centres include:

- Retail - including a convenience food store and small range of retail units;
- Community Building
- Primary School

Two principal character neighbourhood areas have been identified as part of the initial masterplan: northern communities and southern community.

The northern part of the site will provide four well-connected distinct neighbourhoods. Existing topography naturally defines the new settlements that will also form an extension of the existing neighbourhoods such as Sharpness, Newtown, Brookend and Wanswell. A series of green corridors will physically define the edge of these new settlements as well as provide walking/ cycle route networks which will connect the new communities with public transport services, employment, leisure, amenity and health facilities. The character of the northern communities will be influenced by the surrounding landscape and the existing settlements which in turn will give this area a strong identity and character.

To the south of the B4066, the character of the development will be strongly influenced by its proximity to the estuary and natural open spaces to the south, and Sharpness Docks to the north. This land could be promoted to attract eco housing developers which together with the proposed urban farm and its closeness to the community centre and the proposed locally sourced food market could create a strong sense of eco-community

d. Great homes

As identified earlier, whilst the proposals are at a relatively early stage it is our ambition to create vibrant communities through the delivery of a wide range of dwellings sizes, types and tenures in order to accommodate a variety of household types, including much needed affordable housing incorporating a mix of social and affordable rent, shared ownership and starter homes.

In order to further reduce carbon emissions, we also want to ensure that all buildings are highly energy efficient. This can be achieved in part through the building fabric by incorporating high levels of cavity wall and roof insulation; ensuring airtightness; and through the use of triple glazing and low emissivity glass, for example. The siting of the buildings relative to the solar orientation will also be carefully considered at the detailed design stages. This 'fabric first' principle will be complemented through the use of low or zero carbon technology, such as highly efficient space heating, hot water and lighting technologies, and through renewable energy generation, such as through solar and/or wind.

e. Strong local vision and engagement

A comprehensive, detailed engagement strategy will be developed in partnership with Stroud District Council as set out in response to question 7. Sharpness LLP intend to invest substantial resource into the development and execution of an engagement strategy in line with a key set of principles described in response to question 7. At the end of the engagement process we would like residents and stakeholders to feel that they have had a genuine and meaningful

opportunity to shape the future of this new and exciting Garden Community that will support Stroud District and Gloucestershire County to thrive and grow.

f. Transport

Transport is a key consideration for the proposals and we have ambitious aims to minimise car use and maximise the availability of alternative transportation options by putting in both new and refurbished infrastructure. We want to get the basics right, providing easy ways to move around the development, and beyond, either by foot or by bike rather than by car.

Bus Provision

It is recognised that a high quality bus network will be vital in enabling residents to travel sustainably. A development of 2,400 dwellings will facilitate improvements to the bus provision in this area, benefitting new residents of the proposed development but also the existing settlements of Sharpness, Newtown, Brookend, Wanswell and Berkeley. Beyond this, a new bus service could be provided to link between the new and existing villages, local centres and employment opportunities. However, taking into account economies of scale, it is considered likely that improving the existing Stagecoach 62 service would provide the most viable option for the first phases of development with a new bus service being more beneficial when a larger proportion of the new eco village is built.

The key elements of the improved and new bus service provision will include:

- bus stops located in convenient locations (including close to employment, retail and leisure) to provide interchange opportunities with other modes of transport including rail and cycle
- buses with Wi-Fi, on-board announcements and comfortable seating
- provision of shelters, seating, lighting, real time passenger information and raised kerbs at bus stops
- providing bus priority at junctions within and around the site to improve journey time and reliability

As an alternative to a fixed route service, we are also exploring how more forward thinking transportation modes can be implemented. For example, we are currently considering how a demand responsive service such as 'Arriva Click' could be implemented. These systems operate an app based service that routes a smaller, high quality vehicle in real-time to pick up and drop passengers at 'virtual' bus stops. The user requests a journey via the app and the software combines this journey with others, sends a variable route to the sat-nav system in the vehicle for the driver to follow, and advises all passengers on the time to pick up, journey time and location of the 'virtual' bus stop. The driver picks the user up from the designated spot and then travels to the app assigned route.

Rail Provision

A rail link to the Gloucester to Bristol railway line runs adjacent to the B4066 as it approaches Sharpness. Passenger services ceased on the branch in November 1964. However, the line to the docks is still open for occasional freight services.

We are exploring whether the proposed development could help facilitate the reopening of the Sharpness Branch line to passenger services to provide a link between Sharpness and main-line train services at Cam & Dursley station. The route would follow the railway that exists at the site as far as the old Berkeley Station where the nuclear fuel transfer station for the decommissioning of Berkeley Magnox station is located. (The power station will continue in de-commissioning until about 2070 – so this activity is likely to sustain the rail connection in any case for some time) with a terminus at Sharpness Docks and a connection to the Birmingham – Bristol Line approximately 6km east. The route is currently single track and would likely require significant upgrade if frequent passenger services were to resume.

In view of the uncertainties and whilst further details are progressed with regards to the disused railway proposals, the masterplan has been developed to accommodate the potential delivery of a train or mode of transport along the disused railway and allowance for the potential Severn crossing in the longer term. This will be achieved by safeguarding a corridor to accommodate the infrastructure necessary for various operators – as well as positioning land uses in a way which supports transport networks and maximises convenience of access.

The operational requirements and level of service will be subject to detailed analysis and further consideration. However, it is anticipated that services would operate as a 'shuttle' between Sharpness Docks and Cam & Dursley, an approximate length of 10km, with a journey time of between 10 and 20 minutes. The route could be operated similar to the Stourbridge Town Branch Line which uses a people mover to transport passengers between Stourbridge Town and Stourbridge Junction Stations.

Two new stations could be provided, and these have been factored into the initial masterplanning work including:

1. Sharpness Docks: the terminus of the line, providing access to the existing employment opportunities and proposed leisure, and
2. Central Hub: within the mixed-use centre, close to the new villages and providing access to retail and community facilities.

Both stations could provide ticket and timetable information, waiting areas and cycle parking in order to enable residents to undertake multi-modal journeys.

Pedestrian and Cycle Infrastructure

The proposed development at Sharpness presents a significant opportunity to provide new and upgraded pedestrian and cycle connections which would benefit both residents of the new development and the existing settlements of Berkeley and Sharpness

Sharpness eco village will be designed to promote walking and cycling as the main modes of transport, including a 'cycle to school and work' scheme. The

Initial masterplan has been designed around walkable neighbourhood principles where all facilities are within easy reach of all houses. The development is focused upon the neighbourhood centre for the main uses with supporting uses spaced in appropriate walking distances throughout the site.

The proposed green corridor will provide convenient pedestrian and cycle route networks that will easily link residential areas with existing and new facilities. New housing will be located close to areas of employment, local shops, schools, recreation and leisure facilities as part of a strategy to reduce the need to travel, and thereby reducing resource consumption and environmental impact, as well as increasing safety and accessibility for all.

A comprehensive network of walking and cycle routes and facilities will be provided to enable residents to conveniently and safely navigate around the development. The key elements of this network are summarised below:

- a comprehensive network of cycle routes through the development, connecting the residential villages with employment, local centres and education facilities
- a new cycle bridge over the B4066 and railway, providing a link between the development on either side of the B4066. The number of vehicles using the B4066 will increase with the proposed development, potentially making it more difficult for pedestrians and cyclists to cross. A bridge would remove any potential conflict between vehicles and pedestrians/ cyclists on the B4066, reduce any delay which would be caused by a signalised crossing and provide a high quality, sustainable connection
- a cycle hub in the mixed-use district centre which could include cycle parking, maintenance facilities, changing and shower facilities and a café.
- a cycle hire scheme to provide residents with a convenient and sustainable option to complete the last mile of their journey (i.e. cycling from home to the train station or bus interchange)
- provision of a bridleway in the north of the site between Sharpness Docks and Brookend by closing the existing road to vehicular traffic pedestrian and cycle connections across Oldminster Road, between the proposed development and potential future tourism/ leisure development at Sharpness Docks, and
- improved connectivity to Berkeley with potential links to National Cycle Network Route 41 which routes along Station Road.

Overall, the provision of a green travel corridor throughout the site together with improved public transport facilities and new pedestrian and cycle networks will result in a settlement that is not dependent on the private car.

We are also currently considering how we can future proof the scheme to take into account new technologies and changing travel trends. These include:

- the use of app-based services that routes buses in real-time to pick up and drop passengers at 'virtual' bus stops (i.e. demand responsive);
- Mobility as a Service (MaaS); a multi-modal transport service which enables users to pay for a range of travel modes with a single service either as a subscription or pay-as-you-go basis; and
- The provision of electric vehicle (EV) charging points throughout the development

Highway infrastructure

As identified earlier, there is good local road infrastructure from Sharpness Docks (north of the site) to the nearby market town of Berkeley (to the south) along the B4066 Berkeley bypass. However, **local road connections back to the A38 will require substantial improvements early on in the development.**

The M5 Junction 14 at Falfield to the south of the District within South Gloucestershire is also currently at or nearing capacity and the level of growth proposed within the submitted West of England Joint Spatial Plan in South Gloucestershire means there is already likely to be a requirement for substantial improvements. To ensure that growth planned for within both South Gloucestershire and Stroud District future local plans can be accommodated; Highways England is supporting the principle of a comprehensive solution although a scheme has yet to be designed.

The analysis we have undertaken so far for Sharpness indicates that the proposed development will result in an increase in the number of vehicles using M5 Junctions 13 and 14 as well as the A38 junctions between the site and the M5 junctions. The scale of development at Sharpness could help facilitate a new M5 junction to be delivered in consultation with Highways England and Stroud District Council. This new junction would be delivered between Junctions 13 and 14 with one possible location being the existing B4066 bridge over the M5. A new junction would have a number of benefits, including:

- reducing traffic at M5 Junctions 13 and 14, alleviating current capacity concerns
- reducing the number of vehicles travelling along the A38 and through villages such as Cambridge and Stone improving access to Cam and Dursley, and helping facilitate the potential new River Severn crossing to Lydney.

g. Healthy Places

The provision of a green travel corridor throughout the site together with improved public transport facilities will result in a settlement that is not dependent on the private car. A key aim of the proposals is to deliver health and wellbeing benefits through the green features on the site, making sure they can be easily accessed by people close to where they live and work. Sharpness eco village aims to create a place where people want to live, work and play; a place where people can enjoy the environment around them; and a place where people can have happier and healthier lives.

New housing will be located close to areas of employment, local shops, schools, recreation and leisure facilities as part of a strategy to reduce the need to travel, and thereby reducing resource consumption and environmental impact, as well as increasing safety and accessibility for all.

It will be designed to promote walking and cycling as the main modes of transport, including a 'cycle to school and work' scheme. The provision of a green travel corridor throughout the site together with improved public transport facilities will result in a settlement that is not dependent on the private car. The proposed green corridor will provide convenient pedestrian and cycle route networks that will easily link residential areas with existing and new facilities. A comprehensive network of walking and cycle routes and facilities will be provided to enable residents to conveniently and safely navigate around the development.

h. Green Space

The proposed Eco-Village provides many opportunities to create a multi-functional, holistic environment which would form the green infrastructure (GI) strategy

for Sharpness Eco-Village. The proposal includes high quality GI elements including approximately 64 hectares of open space including parks, play areas, a nature reserve, urban farm and street trees, as well as rivers, ponds and other water features as part of a high quality green infrastructure which will be designed for water management, public safety, and the health and wellbeing of individuals and communities.

Accessibility/Connectivity

A fundamental principle for Green Infrastructure (GI) is to provide an inter-connected network of multi-functional spaces. The GI network presented in the GI concept plan included within the Vision Document has many connections at the macro scale. To this, will be added a finer grain of connections along retained Public Rights of Way (PRoW) and new streets and footpaths.

Each of the destination spaces and the interconnecting routes will serve many purposes and will also be designed to be accessible, in terms of gradient and surface treatment. The proposals will result in an attractive, high quality GI provision that will support a diverse wildlife population and contribute significantly to the health and wellbeing of the human population.

Biodiversity net gain

Sharpness eco village will be designed to protect, conserve and enhance existing wildlife and habitats. The development will be away from the estuary shoreline and will provide Sustainable Alternative Natural Greenspace (SANG) to divert recreational usage away from the estuary.

The site is set next to the River Severn which is designated as a Ramsar Site, Special Protection Area (SPA) and Special Areas of Conservation (SAC); these are statutory designations of the highest nature conservation value and reflect the importance of the Severn's estuarine habitats and passage of wintering birds that visit the estuary each year.

The new settlement will be designed to ensure that the Severn's wildlife and habitats are not adversely affected including:

- A focus on retaining the strong hedgerow network;
- Ensuring that development is located away from the estuary shoreline;
- Providing Suitable Alternative Natural Greenspace (SANG) to divert recreational usage away from the estuary; and
- Ensuring appropriate management of recreational access to the estuary.

Existing large areas of natural green spaces and water features, together with the provision of a green travel corridor and further landscape design proposals will create an extensive green infrastructure framework across the site, connecting spaces, activities and habitats, thereby providing a better and more attractive place to live. The proposals represent a significant opportunity to deliver strategic tangible (District-level) biodiversity gain, ensuring compliance with local and national planning policy.

Health, wellbeing and quality of life

The overall GI created by the development would also have an amenity benefit and support the health and well-being of residents and visitors alike. For example, the extensive woodland planting will help with noise mitigation, air quality and even shelter the urban areas from cold north-westerly winter winds.

A 'Country Park' is proposed running north-east to south-west. This would link both sides of the settlement(s) via the two existing railway bridges, which would be cycle/pedestrian links only. This park could also serve as a Suitable Alternative Natural Greenspace (SANG), to keep dog-walkers away from the inter-tidal mudflats and avoid disturbing the birds. The park would include an extensive series of circular walks and include a mix of landscape character (open and wooded) and include parking and appropriate signage. There are destinations within this green corridor, which could also serve a more formal play function. The park would also serve to prevent coalescence of the nuclear settlement of Newton with the linear settlement of Brookend/ Wanswell.

Rather than 'pepper-potting' sports facilities around the development, a central sports facility is proposed that is well connected by sustainable cycle and footpath links, but also close to the main road for ease of access. The vision is to create a multi-functional sports hub to encourage healthy lifestyles, ranging from casual leisure pursuits to sporting excellence.

Sharpness Development LLP has also had an initial meeting with Building with Nature (BwN), a new benchmark for the design and maintenance of green infrastructure in housing and commercial development developed by Gloucestershire Wildlife Trust, in partnership with the University of the West of England, Bristol. It is intended to continue to involve BwN in the planning and design process to enable Sharpness Eco-Village to provide high quality green infrastructure and promote its benefits to the future population. Having BwN involved from an early stage of the planning and design process will help to enable Sharpness Eco-Village provide a high quality green infrastructure and promotes its benefits to the future population.

i. Legacy and Stewardship arrangements

Sharpness Eco Village will be delivered through a private enterprise model. However, it is Sharpness Development LLPs intention to work in partnership with Stroud District Council. While these arrangements are to be agreed, the Council in principle is supportive of sharing its expertise in the matters of town planning, transport policy, community development, social support and economic development to help develop a defined masterplan. This partnership working will also enable the creation of design manuals informed by a strongly shared vision and objectives, and a robust evidence base. In addition, both the Council and the Sharpness LLP are keen to explore the role of the Council in helping to deliver more new affordable homes.

Sharpness Development LLPs intention is to retain a stewardship interest in the Garden Village and the LLP is committed to building sustainable new communities. Discussions are ongoing in relation to how this will be implemented at this stage but it intends to be involved long term in the new community through ownership of affordable units and also the management of public open space and Suitable Alternative Natural Greenspace. The LLP's aim is to increase the opportunities for people to thrive by giving them access to great homes and services to match. This supports the creation of strong and vibrant communities.

This can already be seen in practice through the work of GreenSquare Group which engages with its customers and works with partner agencies to help customers achieve an independent and positive life and to enhance the environment and communities within the schemes it builds and neighbourhoods in which they live. Some of the ways GreenSquare invites interaction with the communities it serves are outlined in the "GreenSquare Involvement Guidelines"

including:

- neighbourhood forums and focus groups - bring together residents from across the organisation, to provide ideas about their environment and our services. Key groups are Older Persons Forum, Disability Forum and Design Group.
- neighbourhood walkabout and surveys - Information brought to residents doorsteps and the chance to tell GreenSquare what's happening in their neighbourhood.
- community board members – residents can drive improvements to services, quality of homes and neighbourhoods and ensure that GreenSquare are meeting their promises.
- resident scrutiny panel – residents can scrutinise GreenSquare's performance and work, carry out inquiries into services, make recommendations and report to the GreenSquare Board.
- resident inspectors – residents can inspect GreenSquare's services and make recommendations for improvements
- community events - anything from clean up days to fun days. A way for residents to meet their neighbours and build community spirit.
- neighbourhood links - residents can be a link between the residents where they live and GreenSquare
- community fund – residents can review applications and award funding for community projects.
- estate improvement fund – residents can suggest and present ideas for improvements to the area where they live.

We are currently exploring how the above principles can be implemented by Sharpness Development LLP as a whole, and continue its involvement far beyond its role as the facilitator of delivery. For example, it is GreenSquare's intention to own and manage the majority of the affordable homes to be constructed as part of the development. GreenSquare also wants to take an active role in the management of the physical facilities and infrastructure to be provided to support the new community in line with its Corporate Social Responsibility Plan. The Group has extensive experience in managing items of this nature and has resources and structures in place to undertake such activities. GreenSquare Estates, an in-house specialist estate management company being an example. Beyond management of the physical, GreenSquare already demonstrates an active and expanding programme of community involvement supporting its aim to create strong and vibrant communities. GreenSquare's on-going success supporting the Rose Hill Regeneration Partnership in Oxford is an example. Before the completion of the physical building work to regenerate this run down decaying estate in Oxford, GreenSquare appointed a community worker. This officer worked with local residents and other agencies working in the area to set up the Rose Hill Regeneration Partnership. This Partnership focused on the community and social regeneration of the area to make Rose Hill a better place to live. Its aims at inception were:

1. To provide training so local adults can make a positive contribution to the community as volunteers, demonstrating increased skills, confidence and motivation and giving them better employment chances and greater participation in community life.
2. To increase access to information about the activities and opportunities on the estate, to raise community self-esteem.
3. To increase the health and wellbeing of adults and children by providing safe, healthy, creative and physical activities.
4. To encourage distinct cultural groups to take part in shared activities, resulting in improved relationships and community cohesion.

The success of the Partnership, in achieving these aims, is illustrated by the award of a Big Lottery Grant of £361,714 in 2011 and a further award of £458,100 in 2017. The second award is a strong recognition of the success of the Partnership, supported in a great part by GreenSquare, in transforming Rose Hill from a failing place, to a vibrant community. The LLP is currently exploring with the team how a similar method of consultation can be utilised and enhanced in the case of Sharpness.

f. Future Proofed

A full design and technical team has been appointed by the LLP in respect of matters relating to flood risk and drainage, energy and transportation. A key aim of that work is to consider how the proposals can meet and adapt to changing needs, technological advances and environmental change to ensure the scheme can meet the needs of current and future generations. We are already looking at renewable energy measures in particular, and are engaging with local green energy company Ecotricity on how we can deliver a variety of renewable energy technologies at the site including: Wind Turbines, PV, Water Turbines and Heat Pumps. Whilst we are still at early stages, the LLP is committed to delivering an innovative and future proofed scheme.

b) Provide details of review mechanisms and tools that will be put in place to secure delivery of the quality aspects of the garden community. E.g. a design review panel.

Delivering exceptional quality places that provide a long term legacy will depend upon putting in place a strong governance structure. This structure will include a design quality board comprising Sharpness Development LLP, Stroud District Council, Gloucestershire County Council and representatives from the local community as well as members of the Gloucestershire Design Review Panel. This will enable a key input into the masterplanning process and the progression of the development through the preparation of a design framework and design codes.

Sharpness Development LLP is committed to the design quality board process, however its effectiveness will of course be dependent upon the availability of funding and commitment by the local authority and other stakeholders in ensuring the delivery of its outputs. We see Homes England as playing a key role in helping to assist with this and the resources available to the LPA.

Deliverability

Milestones

10 a) Identify the key risks to delivery of the milestones between now and start on site shown in the timeline submitted with this bid and set out the measures you will take to mitigate these risks.

The indicative timeline of key milestones and dependencies has been based upon a somewhat cautious approach to the delivery of homes on the ground; the local plan review has been used as the starting point for the timeline. As such, we have already sought to factor likely potential risks into this timeline. Nevertheless, some of key risks we see as likely to affect the delivery/achievement of the milestones include:

- The local plan review timescale – e.g. the potential for delays at the local plan examination etc. regarding the allocation of the site which could slow down a grant of planning permission.
- Timely grant of outline planning permission, discharge of conditions and approval of reserved matters – e.g. issues may be raised by consultees that stall the grant of permission such as matters relating to highways and ecology
- Ensuring efficient pre-application engagement and discussions with various consultees/stakeholders and working together to deliver what is needed for sub-regional growth going forward. Ensuring issues are dealt with promptly will avoid delays with the examination of the Local Plan Review and other neighbouring authorities who are progressing plans, such as South Gloucestershire.

In terms of steps to mitigate these issues, the LLP and Stroud District Council are seeking to work together to 'front-load' consideration of key issues that might slow down the determination of any planning application relating to some of the key constraints: highways, ecology and flood risk. For example, pre-application discussions are already being held with key consultees and stakeholders such as Natural England and the Council is also part of a Highways working group with Gloucestershire County Council, Highways England and other neighbouring authorities with respect to the M5 junctions. At application stage a planning performance agreement will also be agreed between the Council and the LLP. However, the Council would be grateful for the resources that can be provided by Homes England to assist in achieving the key milestones and if not to exceed them and deliver homes on the ground even quicker as set out later in this submission.

b) Provide a high-level commentary on the assumptions that have been made with respect to the housing trajectory for the garden community.

The Council's Emerging Strategy currently assumes a delivery for the plan period 2020 to 2040 of around 2,400 dwellings. This is based on delivery commencing in 2026 and 150 dwellings a year being produced between 2027 -2036, and 250 from 2036 - 2040 and beyond. (This trajectory could vary depending on the speed of delivery of the Local Plan review as well as market circumstances at the point at which a planning application is approved.) With the right support and resources of Homes England on the programme, the Council and LLP consider that there is a real opportunity to enhance the delivery trajectory up to 2040 with an aim to delivery commencing earlier than 2026 and the potential to increase annual build rates.

Furthermore, the Council understands that the site has potential for at least 5,000 new dwellings and will explore mechanisms to ensure that the long term planning of the new settlement with associated infrastructure is supported by a comprehensive masterplan and through emerging and future plans.

c) Set out any opportunities that there are to accelerate his housing trajectory including any interventions that would be needed to support acceleration.

As identified earlier, the Council's Emerging Strategy for Stroud District identifies the potential for the site to deliver around 2,400 dwellings up to 2040. The Eco Village has capacity to grow to 5,000 dwellings.

Under the right conditions for growth, Sharpness Development LLP considers that development at Sharpness could be accelerated, both in terms of commencement and build rate. Assistance and recognition by Homes England that the development is part of the Garden Communities programme would help accelerate the delivery of his Growth Point through the planning system and help with unlocking unforeseen barriers to achieving key milestones.

The creation of a new community that incorporates self-containment, draws upon green threads and sustainable practices, and also creates an environment for regeneration which will naturally create significant local interest and unleash an appetite for new sustainable living practices that are not currently being met through traditional building practices or elsewhere within the County. We are confident that the interest in modern sustainable living will stimulate the market and ensure a speedy delivery of the overall development.

The inherent nature of a garden village is that it is located in an area that is not naturally recognised or associated as accommodating significant growth. As a consequence, there may be concerns by future occupiers and residents that there will be little in the way of infrastructure and services from the outset of the development. These concerns will inherently be balanced by the sustainable benefits that a Garden Community will deliver in everyday life. Accordingly, intervention by Homes England in the provision of enhanced road and rail infrastructure will help in the delivery of the vision for this site.

As identified earlier, delivering exceptional quality places that provide a long term legacy will also depend upon putting in place a strong governance structure. Sharpness Development LLP is currently exploring how it can continue its involvement far beyond its role as the facilitator of delivery and take an active role in the management of the physical facilities and infrastructure to be provided to support the new community. This will ensure the creation of an attractive and deliverable growth point within this market area. It will also ensure that there is healthy developer and occupier interest in the site confirming that housing, employment and commercial uses will be delivered in a timely fashion throughout the plan period.

Overall, the joint vision held by the Council and Sharpness Development LLP is that a new Eco Village at Sharpness will create a highly desirable, new self-contained settlement connected with nature and seamlessly integrated into the landscape. Sharpness is also geographically well located in terms of access to the highway network; both the A38 (providing access to Bristol, Gloucester and villages including Cam and Dursley) and the M5 (the key route between the Midlands and the South West) are located to the east of the site. It also accords with the LEP's plan to promote a Gloucestershire growth zone to deliver quality employment land in proximity to the M5 motorway attractive to businesses. Further employment and housing growth at Sharpness with supporting infrastructure will be fully in accordance with this growth zone focus and the SEP and will extend it to unlock new potential.

The GREEN project at nearby Berkeley power station is also a key SEP project, where the LEP, in partnership with South Gloucestershire and Stroud College, is establishing a Gloucestershire centre of excellence in Renewable Energy, Engineering & Nuclear skills which will be a focus for growing research, training and economic development at the site. Initial discussions have already identified the potential for additional college and employment provision as part of the new settlement to support the continued growth of this project and helping to ensure its viability for the future.

You will be asked at the end of the form to provide evidence of the following:

- A **timeline of the key milestones and dependencies** between now and start on site for the new garden community.
- A **structure chart / organogram** of the proposed governance structure for the garden community which shows the role and responsibilities of key project partners, e.g. Local Planning Authority, County Council, LEP, Government agencies, landowners, developers, etc.

Infrastructure

11 a) Provide a list of the key items of infrastructure that will be required to support delivery of the garden community. Transport-related; education, health, country parks, etc.

The potential to create a new settlement of around 5,000 homes at Sharpness will require:

- A comprehensive pedestrian, cycle and public transport offer will be vital to ensure sustainable travel is a viable option for the proposed development.
- New public transport services connecting the new development with the existing settlements of Berkeley, Cam and Dursley will be required for buses.
- **The level of traffic generation from the new settlement is likely to require improvements to be made to existing local junctions (to ensure safety and capacity requirements are met) and, especially with further growth, the need for improvements to the strategic road network, i.e. the A38 and M5 junctions.**
- The provision of new primary schools and **potential a new secondary** school as well as expansion of existing facilities.
- The provision of SANG, potentially in the form of a country park at approx. 50 ha.
- The provision of new community and health centre.

b) Outline any significant new or upgraded utility provision that will be required to support delivery of the garden community.

At this stage it is envisaged the following types of utility provision will be required:

- Potential electric supply of at least 15 Mega Volt Amp (MVA)
- Requirement for EV charging points in buildings
- Potential improvements to gas and waste water treatment capacity
- Potential to drain effluent to existing large waste water treatment works (WWTW) will require a significant length of new pumped infrastructure to be delivered
- Potential requirement to construct a new WWTW to serve the development - would also offer opportunities for 'black water' harvesting whereby a portion of the treated effluent could be diverted and used for irrigation etc.
- Rainwater Harvesting system to reduce potable water requirements
- A network of pumping stations will be required to discharge foul effluent to the eventual receiving system
- Internet/telephone connections

Land

12. Provide a brief commentary on the land ownership and development promotion arrangements within the proposed garden community site. This should include:

a) Details of land owners, promoters and developers;

S43(2)

[Redacted]

- S40(2)
- S40(2)
- S43(2)
- S40(2)

b) Extent to which land is under option and any agreements in place;

S43(2)

- S40(2)
- S40(2)
- S43(2)

S40(2)

S43(2)

c) Details of any discussions about delivery mechanisms and models which have taken place;

Sharpness Development LLP has been formed with the sole purpose of acting as land promoter and delivery vehicle for the Sharpness garden community. The LLP is in continued discussions with all landowners in regard to the phasing and delivery of development and landowners are in principle agreement. Sharpness Development LLP also intends to explore how it can work in partnership with Stroud District Council to help deliver affordable homes. While these arrangements are to be agreed and subject to further discussions, the Council are keen to work with GreenSquare Group to develop/facilitate the provision of social housing.

d) Envisaged site assembly period including whether land can be drawn down in phases;

S43(2)

[Redacted]

e) Details of any part of the site that is public sector land.

S43(2)

You will be asked at the end of the form to provide evidence of the following:

- **Land ownership plan** – an overlay of the Strategic Framework Plan showing the extent of the different key land interests within the scheme boundary plan at the same scale as the Strategic Framework Plan.

Planning

13 a) Indicate the planning status of the site(s) for the garden community.

The site is not included within the current Local Plan. However, the site has been included within the Local Plan Review Emerging Strategy Paper as a key component of the emerging spatial strategy for delivering future growth. The document was approved by Stroud District Council for the purposes of public consultation on 11 October 2018. This paper will be subject to Regulation 18, public consultation from 16 November 2018 to 18 January 2019.

b) Describe the status of the current Local Plan and if relevant provide a timescale and key milestones for its adoption.

The current Local Plan was adopted in November 2015. The Local Plan Review commenced with an issues and options consultation in Autumn 2017. An Emerging Strategy document will be subject to public consultation from 16 November 2018 to 18 January 2019. The future published timetable, set out in the Council's Local Development Scheme, envisages Reg. 18 consultation on a full draft plan in Autumn 2019; pre-submission consultation Autumn 2020; and anticipated adoption by Winter 2021/22.

c) Highlight any significant planning constraints that may affect allocation and development of the site. E.g. green belt status, flooding risk, designated heritage assets, etc.

There are three significant planning constraints relating to this site:

Transport infrastructure

Whilst there is good local road infrastructure from Sharpness Docks (north of the site) to the nearby market town of Berkeley (to the south) along the B4066 Berkeley bypass, local road connections back to the A38 will require substantial improvements.

The M5 Junction 14 at Falfield to the south of the District within South Gloucestershire is currently at or nearing capacity and the level of growth proposed within the submitted West of England Joint Spatial Plan in South Gloucestershire is likely to require substantial improvements. To ensure that growth planned for within both South Gloucestershire and Stroud District future local plans can be accommodated; Highways England is supporting the principle of a comprehensive solution although a scheme has yet to be designed.

Ecology

The site is located in close proximity to the Severn Estuary SPA/SAC/Ramsar site. Recent work by the District Council has identified that the estuarine coast is subject to recreation pressures due to increasing visitor numbers. Habitat Regulation Assessments (HRA) have concluded that proposed residential growth within the catchment of Severn Estuary SAC/SPA/Ramsar could have a likely significant effect, in the absence of appropriate mitigation. Whilst an exemplar scheme at Sharpness would be designed to deliver extensive green infrastructure and recreation focussed mitigation, the design of an appropriate mitigation scheme will need careful handling.

Flood risk

The site is in close proximity to the Severn Estuary and parts of the site are subject to flood risk. Planning for a new settlement will require review of fluvial and tidal flooding and the scheme will need to put forward an effective strategy for flood risk avoidance and, where appropriate, mitigation.

d) If any of the site is classified as brownfield, please highlight the proportion and nature of the brownfield element.

Sharpness is a greenfield site, although the development may provide some opportunities to remodel some limited areas of brownfield land within the existing built up areas of Newtown/Sharpness/Wanswell. However, a successful new community would help to support and underpin the on-going regeneration of the Sharpness Docks Estate which is 80% brownfield land.

e) Briefly describe the high level planning strategy proposed to facilitate delivery of the garden community. This should include both plan-making and development management routes.

The Council is currently reviewing the Local Plan and it is proposed that the site will be an allocation within the Plan for the delivery of at least 2,400 new homes and 10 hectares of employment land by 2040. The Local Plan is due to be submitted for examination in winter 2020.

The Council will work with the promoters of the site to progress the evidence required to support the allocation and will jointly produce a framework document and draft development brief for submission with the draft Plan.

The Council and LLP is keen to explore the delivery methods which would be most appropriate for delivering this new settlement and the opportunity for partnership working with the private sector to deliver more affordable housing for local needs and capacity within the Council for delivering additional council houses, perhaps through a formal joint venture partnership or the creation of a local housing company. The Council would welcome the support the Garden Communities programme may offer in terms of building knowledge and capacity of delivery options.

As identified earlier, Sharpness LLP will also explore with the Council whether a form of Development Consultation Board can be formed with the Council, Gloucestershire County Council, member of the Gloucestershire Design Review Panel, Homes England and potentially a representative from community bodies (parish councils) which can be used as a mechanism to steer the project on integrated design and delivery matters as well as bidding for public funding. This type of partnership working will ensure design quality and the delivery of a sustainable legacy as well as helping to secure the likely level of public as well as private investment required to deliver this development.

Assuming that the plan is found sound by 2021, the Council will work with Sharpness Development LLP on the required planning applications and additional capacity to support working up the scheme will be required by the Council. From a development management perspective, the Council will create a project team to manage the planning applications through the process and will agree a planning performance agreement with the LLP.

Viability

14 a) Provide a brief market commentary on existing land values, levels of local housing demand and need, local housing affordability, and types of homes needed locally to meet need.

S43(2)

Levels of local housing demand and need

As identified earlier in this submission, Stroud District is an area of high housing demand. Under the standard housing method, Government requires the Stroud Local Plan Review to provide for at least 603 new homes per year (based on the latest 2016 household projections), or at least 638 new homes per year (based on the previous 2014 household projections). Either way, this requires a 32% to 40% increase on the figure in Stroud's current Local Plan of 456 homes per year. The proposals at Sharpness for a new eco village would therefore provide a key component in the Council meeting those needs.

Local Housing Affordability

As also identified earlier, the latest affordability ratio between income and house prices in Stroud District is 8.8 – one of the highest levels in the South West which is a major factor in driving the future housing requirement in the District using the new standard method. The latest ONS data from August 2018 in relation to house prices (UK House Price Index England: August 2018) identifies that in Stroud District the average house price is £288,862. This is compared to an average of £249,748 for England as a whole, and £266,713 for Gloucestershire as a whole. Therefore it is clear that Stroud is suffering from clear affordability issues.

Types of homes needed locally to meet need

Stroud District Council commissioned a Strategic Housing Market Assessment (SHMA) in 2015 as part of the evidence base to the current Local Plan. The Council is in the process of reviewing this as part of the Local Plan review. However, based on the information from the 2015 SHMA the Council's profile of new accommodation required in Stroud included:

Market housing

- 273 – 1 bed
- 1,651 – 2 bed
- 1,891 – 3 bed
- 807 – 4 bed

Therefore the highest demand for market housing is for 2, 3 and 4 bedroom homes.

Shared ownership

- 181 – 1 bed
- 154 – 2 bed
- 75 – 3 bed
- 62 – 4 bed

Therefore the demand is highest for 1 and 2 bedroom shared ownership properties.

Affordable rent

- 218 – 1 bed
- 697 – 2 bed
- 373 – 3 bed
- 13 – 4 bed

Therefore demand is highest for 2 bedrooms, followed by 3 bedroom properties.

Social rent

- 68 – 1 bed
- 83 – 2 bed
- 118 – 3 bed
- 47 – 4 bed

Therefore, demand for social rent is highest for 3 bedroom properties, followed closely by 2 bedrooms.

S43(2)

[Redacted content]

c) Set out the key dependencies and phasing implications between housing and infrastructure delivery.

At this early stage, high level assumptions have been made regarding likely phasing between housing and road infrastructure delivery which is likely to be the key infrastructure required to support the delivery of new homes in the first instance. Discussions are ongoing regarding the timescales for delivery of other necessary infrastructure including for example, education facilities etc.

d) Describe any plans to access finance, including private sector investment.

At this early stage, it is anticipated that private sector investment will mainly come from the housebuilding companies that will buy and develop the development parcels. However, as above, discussions regarding plans to access finance and private sector investment are ongoing.

Government Support

15. Please outline what aspects of the government support package set out in the prospectus you would like to draw on to support delivery of the new garden community. Please be as specific as possible and highlight how the support requested would help deliver additional or accelerated housing delivery.

As identified throughout this submission some of the key areas of the support package the Council and LLP would like to draw upon include:

- Resource funding - to help enable the Council to formulate a specific project team to manage any planning applications and ensure additional capacity and dedicated resources to focus on the timely delivery of the project. This will also help with the formulation of a design quality board process as noted earlier in the submission, the effectiveness of which will be dependent upon the availability of funding and commitment by the local authority and other stakeholders in ensuring the delivery of its outputs.
- Delivery advice and support
- Cross-government brokerage – this will be helpful in assisting with addressing potential barriers to the development in a timely manner given some of the key constraints of the site in relation to ecology, flood risk and drainage and highways. For example, brokerage with Highways England is likely to be beneficial in this case.
- Access to the online garden communities toolkit – this will provide a useful resource to the Council as the delivery of a garden community has not previously occurred in Stroud District.

Additional Evidence Checklist

These items of evidence need to be submitted to gardencommunities@communities.gsi.gov.uk

By checking or selecting 'yes' I confirm that I have emailed a copy of this evidence to gardencommunities@communities.gsi.gov.uk

Location Plan - one or more plans showing the location of the proposed garden community outlined in red. It should also indicate the location of any nearby communities/development, and the boundaries of the Local Planning Authority, County Council, LEP. Include site boundary coordinates. This plan should also highlight the extent of brownfield conditions on the site if relevant.



Strategic Framework Plan for the proposed garden community – this should show: the broad disposition of proposed land uses and major infrastructure proposed.



Land ownership Plan – an overlay of the Strategic Framework Plan showing the extent of the different key land interests within the scheme boundary plan at the same scale as the Strategic Framework Plan.



Provide a **structure chart / organogram** of the proposed governance, legal and financing structure for the garden community which shows the role and responsibilities of key project partners, e.g. Local Planning Authority, County Council, LEP, Government agencies, landowners, developers, etc.



High level viability appraisal (budget statement, and linked cash flow with all key assumptions clearly shown)



A **timeline of the key milestones and dependencies** between now and start on site for the new garden community.



Annual housing trajectory for the garden community.



Can you provide evidence of support for your proposal from the following:

You will be asked to answer 'Yes', 'No', or 'Awaiting Response.' If 'Yes' is selected you will need to provide details of engagement and attach relevant evidence. If 'No' or 'Awaiting Response' is selected you will need to provide reasoning.

a) **Local MP(s)**

Yes

b) **Local community**

Awaiting Response

Please provide further reasoning

Public consultation on the Emerging Strategy including the new settlement at Sharpness will commence on 16 November 2018.

c) **Local Enterprise Partnership(s)**

Yes

d) **County Council** (where relevant)

Yes

e) **Neighbouring local authorities**

Awaiting Response

Please provide further reasoning

Public consultation on the Emerging Strategy including the new settlement at Sharpness will commence on 16 November 2018. However a Statement of Common Ground has been signed with South Gloucestershire Council (see answer to Q 8).

f) **For private sector led** - the relevant local authority

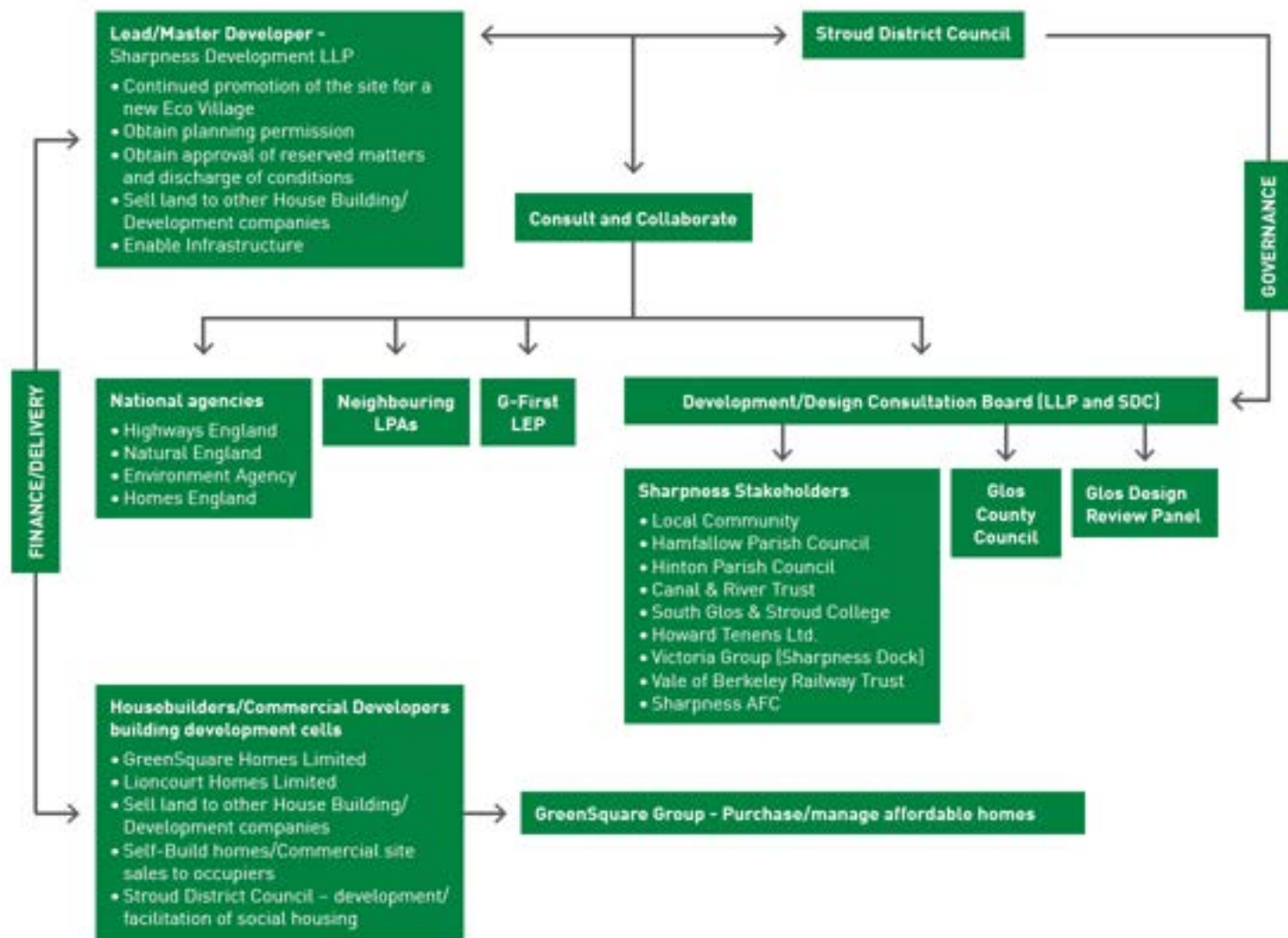
Yes



g) **Any other key stakeholders**

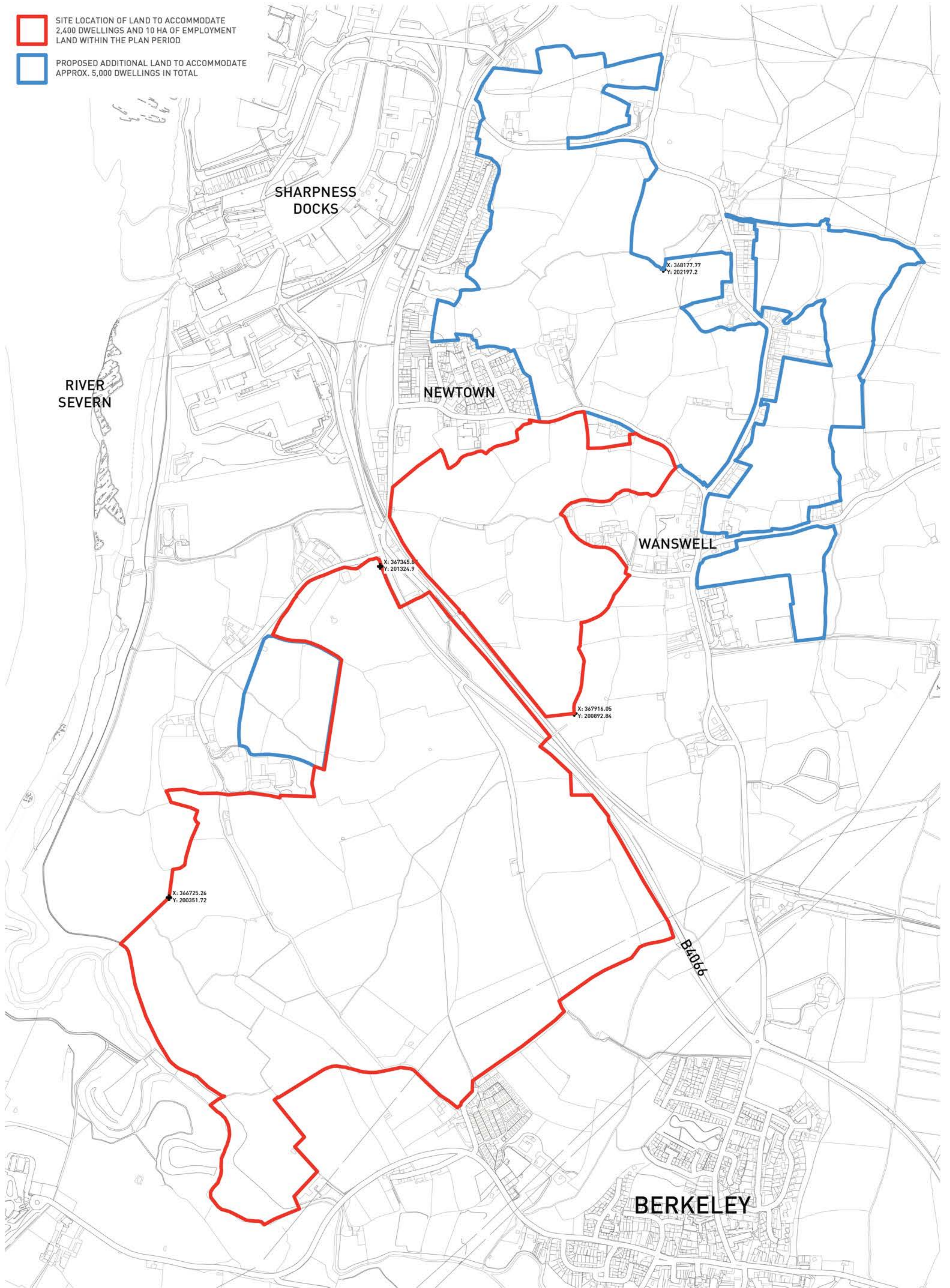
Awaiting Response

Please provide further reasoning

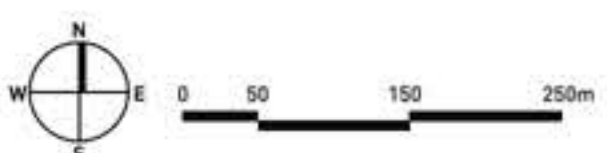
Our submission refers to ongoing discussions with a variety of stakeholders. Public consultation on the Local Plan Review commencing 16 November 2018 will provide an opportunity for the Council to consider the formal responses from these and additional stakeholders.



-  SITE LOCATION OF LAND TO ACCOMMODATE 2,400 DWELLINGS AND 10 HA OF EMPLOYMENT LAND WITHIN THE PLAN PERIOD
-  PROPOSED ADDITIONAL LAND TO ACCOMMODATE APPROX. 5,000 DWELLINGS IN TOTAL



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SHARPNESS GROWTH POINT - LOCATION PLAN



CUMULATIVE

PHASE 1: CIRCA 75 DWELLINGS IN 2026	75
PHASE 2: CIRCA 150 DWELLINGS IN 2027	225
PHASE 3: CIRCA 150 DWELLINGS IN 2028	375
PHASE 4: CIRCA 150 DWELLINGS IN 2029	525
PHASE 5: CIRCA 150 DWELLINGS IN 2030	675
PHASE 6: CIRCA 150 DWELLINGS IN 2031	825
PHASE 7: CIRCA 150 DWELLINGS IN 2032	975
PHASE 8: CIRCA 150 DWELLINGS IN 2033	1125
PHASE 9: CIRCA 150 DWELLINGS IN 2034	1275
PHASE 10: CIRCA 150 DWELLINGS IN 2035	1425
PHASE 11: CIRCA 150 DWELLINGS IN 2036	1575
PHASE 12: CIRCA 250 DWELLINGS IN 2037	1825
PHASE 13: CIRCA 250 DWELLINGS IN 2038	2075
PHASE 14: CIRCA 250 DWELLINGS IN 2039	2325
PHASE 15: CIRCA 250 DWELLINGS IN 2040	2575

EMPLOYMENT & MIXED USE CENTRES TO BE MARKETED IN PHASE 4. SUBJECT TO FURTHER INVESTIGATION, THE CURRENT QUANTUM OF MIXED USE LAND INCLUDING EMPLOYMENT IS 12.5HA. (THIS IS SUBJECT TO FURTHER ASSESSMENT OF LIKELY DEMAND/END USERS)

1* PRIMARY SCHOOL TO BE DELIVERED AT APPROPRIATE TIME TO SERVE PHASES 1-10

2* PRIMARY SCHOOL TO BE DELIVERED AT APPROPRIATE TIME TO SERVE PHASES 11-15

3* PRIMARY SCHOOL TO BE DELIVERED AT APPROPRIATE TIME TO SERVE POST PLAN PHASES

SECONDARY SCHOOL LOCATION AND PHASING TO BE DETERMINED

PHASES POST PLAN PERIOD

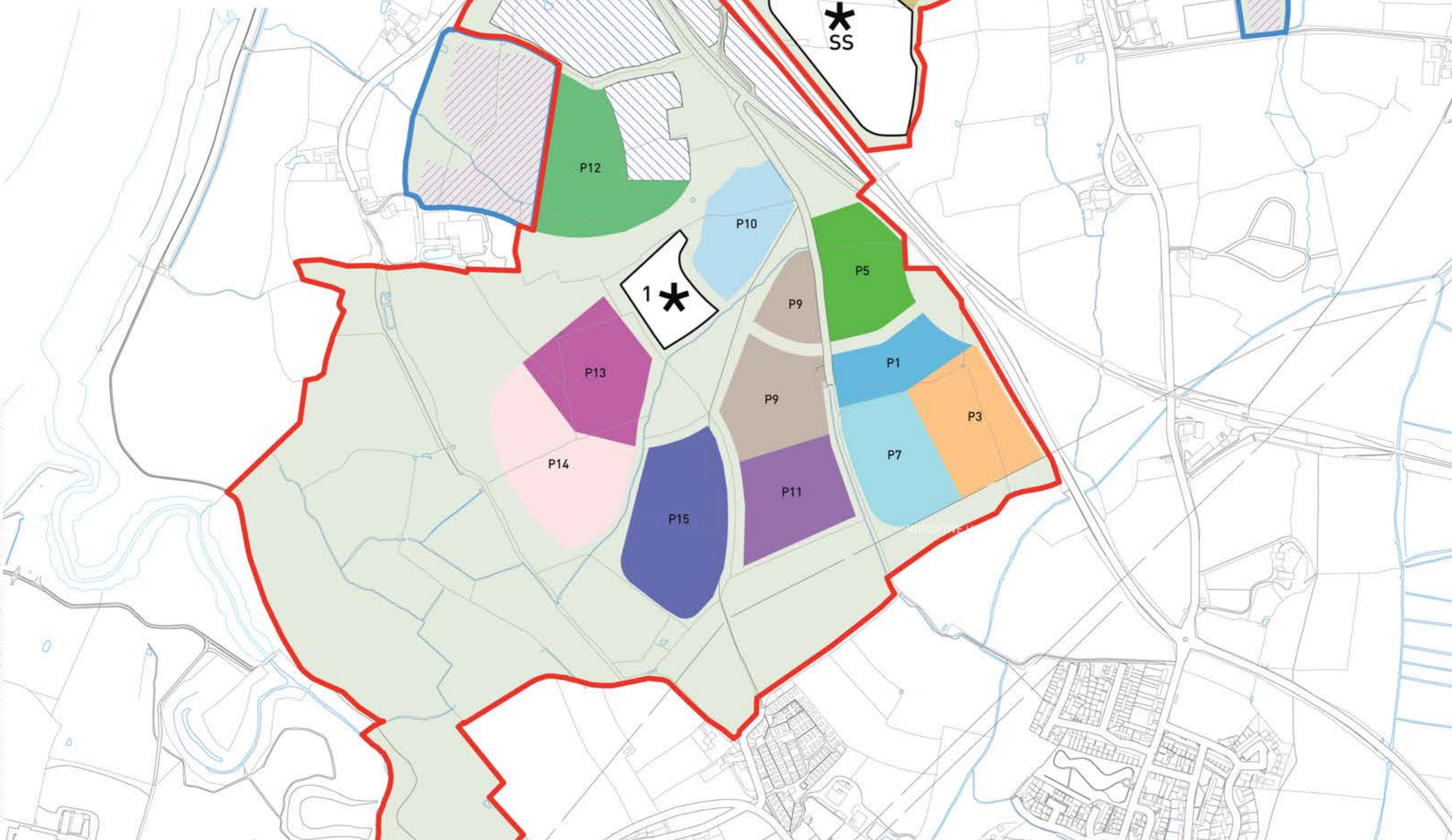
NOTE: THE PHASING PLAN DOES NOT INDICATE THE PHASING OF GROUNDWORKS, GROUND REMODELLING, DRAINAGE INFRASTRUCTURE AND THE PROVISION OF UTILITIES WHICH MAY NEED TO EXTEND BEYOND PHASED AREAS TO PROVIDE NECESSARY SERVICES.

TIMINGS ARE APPROXIMATE AND SUBJECT TO CHANGE.

Red outline: SITE LOCATION OF LAND TO ACCOMMODATE 2,400 DWELLINGS AND 10 HA OF EMPLOYMENT LAND WITHIN THE PLAN PERIOD

Blue outline: PROPOSED ADDITIONAL LAND TO ACCOMMODATE APPROX. 5,000 DWELLINGS IN TOTAL

RESIDENTIAL WITHIN MIXED USE CENTRE AND ELDERLY ACCOMMODATION TO BE DELIVERED AT SOME POINT WITHIN THESE PHASES

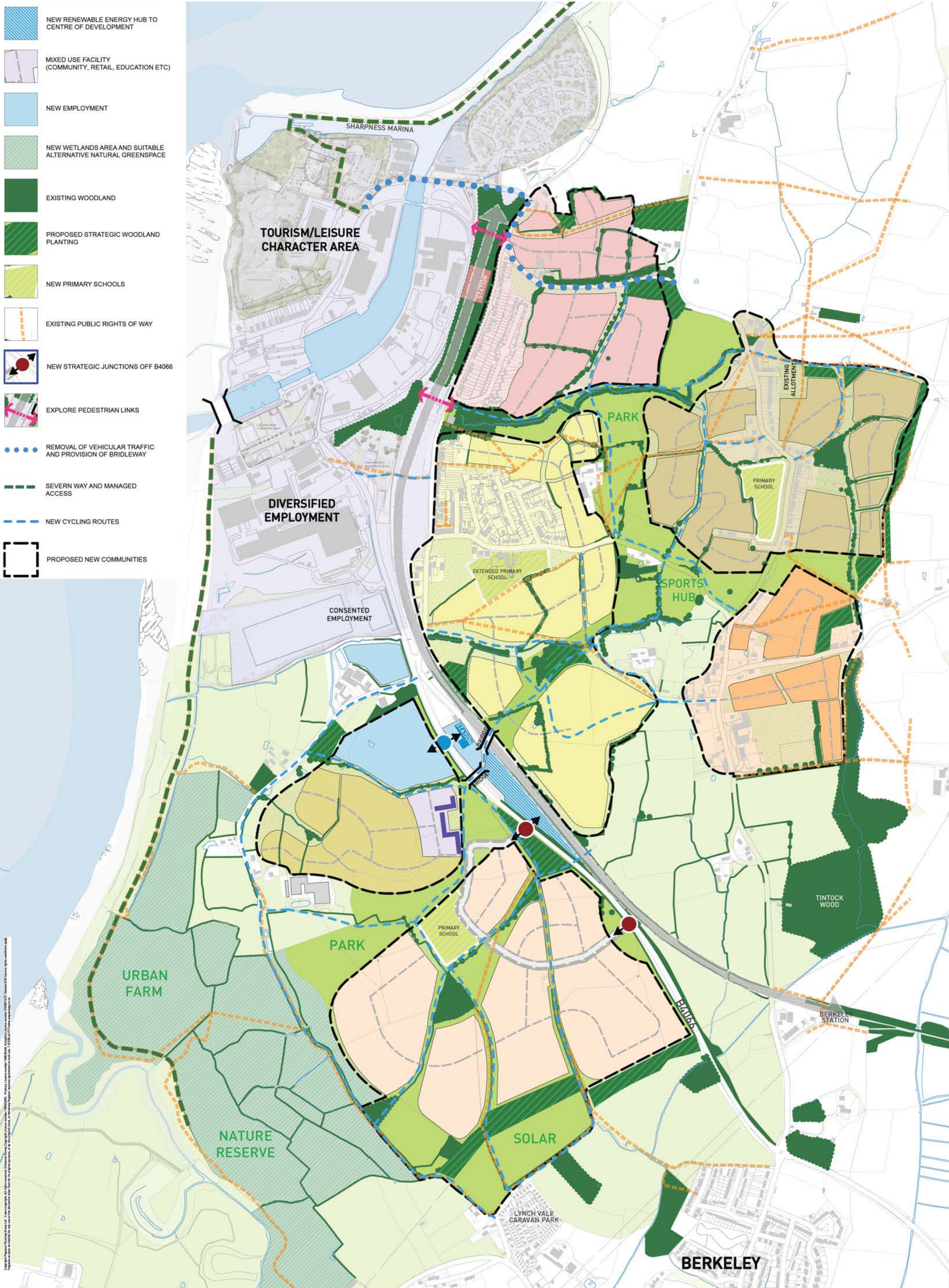


SHARPNESS GROWTH POINT - INDICATIVE PHASING

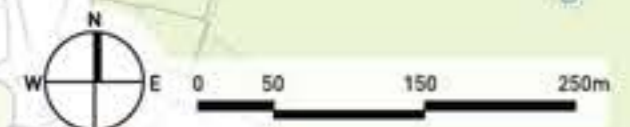


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-  NEW RENEWABLE ENERGY HUB TO CENTRE OF DEVELOPMENT
-  MIXED USE FACILITY (COMMUNITY, RETAIL, EDUCATION ETC)
-  NEW EMPLOYMENT
-  NEW WETLANDS AREA AND SUITABLE ALTERNATIVE NATURAL GREENSPACE
-  EXISTING WOODLAND
-  PROPOSED STRATEGIC WOODLAND PLANTING
-  NEW PRIMARY SCHOOLS
-  EXISTING PUBLIC RIGHTS OF WAY
-  NEW STRATEGIC JUNCTIONS OFF B4066
-  EXPLORE PEDESTRIAN LINKS
-  REMOVAL OF VEHICULAR TRAFFIC AND PROVISION OF BRIDLEWAY
-  SEVERN WAY AND MANAGED ACCESS
-  NEW CYCLING ROUTES
-  PROPOSED NEW COMMUNITIES



SHARPNESS GROWTH POINT - INDICATIVE MASTERPLAN



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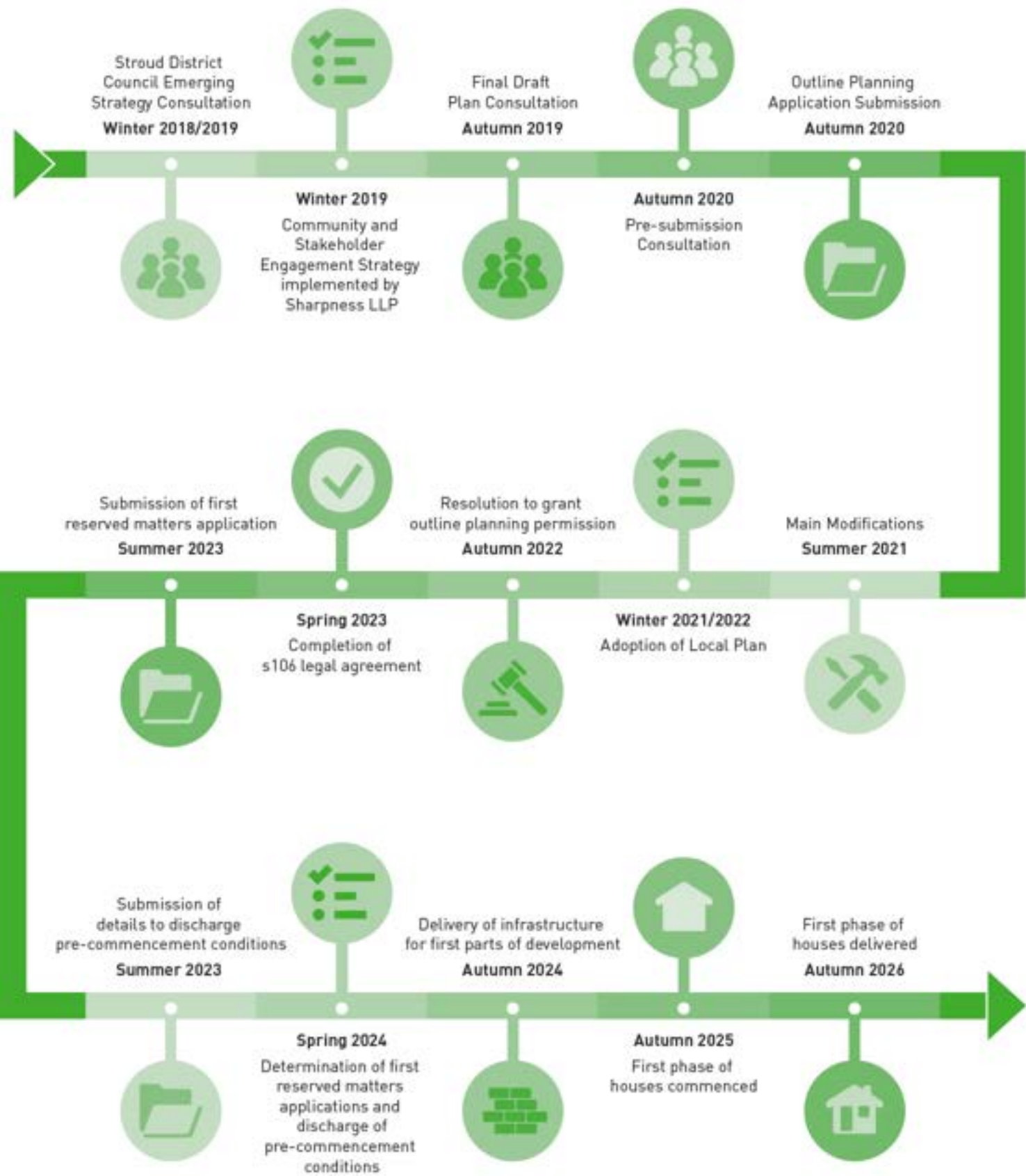


INDICATIVE ANNUAL HOUSING TRAJECTORY

Year	Housing Delivery
2026	75
2027	150
2028	150
2029	150
2030	150
2031	150
2032	150
2033	150
2034	150
2035	150
2036	150
2037	250
2038	250
2039	250
2040	250
Beyond 2040	250 per annum

Note: This trajectory could vary depending on the speed of delivery of the Local Plan review as well as market circumstances at the point at which a planning application is approved. With the right support and resources of Homes England on the programme, the Council and LLP consider that there is a real opportunity to enhance the delivery trajectory up to 2040 with an aim to delivery commencing earlier than 2026 and the potential to increase annual build rates.

Indicative Timeline of Key Milestones and Dependencies



ANTICIPATED TIMELINE FOR DELIVERY OF KEY TRANSPORT INFRASTRUCTURE

Year	Dwellings		Potential Transport Infrastructure							
	Per year	Cumulative	Pedestrian / Cycle		Bus		Rail		Road	
Prior to 2026	0	0	Establish pedestrian and cycle connections to new and existing transport infrastructure	Destination Hub (inc. rail station, bus stops and cycle parking)	Destination Hub (inc. rail station, bus stops and cycle parking)	Extend Stagecoach 62	Destination Hub (inc. rail station, bus stops and cycle parking)	Train / tram link along Sharpness rail chord	New B4066 / Saniger Lane junction to tie-in with Destination Hub	Improvements to existing local and strategic junctions and links / new junctions provided to access phases of development
2026	75	75								
2027	150	225	Establish pedestrian and cycle connections between phases and to new and existing transport infrastructure							
2028	150	375								
2029	150	525								
2030	150	675								
2031	150	825								
2032	150	975								
2033	150	1125								
2034	150	1275								
2035	150	1425								
2036	150	1575								
2037	250	1825			New circular bus service					
2038	250	2075								
2039	250	2325								
2040	250	2575								
Post 2040	2600	5175								

Garden Communities Programme Board Agenda item 3

The Board is asked to:

- **Select a final list of garden village bids to recommend to Ministers for inclusion in the Garden Communities programme. (Note that these will be subject to a check on local authority support post-local elections).**
- **Note the financial implications if the recommended Garden Villages are accepted on to the programme.**

Role of the Board

- **To agree all successful future garden communities for recommendation to Ministers, including the type of support on offer.**
- **To agree/accept future garden communities as part of the programme, following Ministerial designations**

Purpose

1. This paper sets out the summary of information on the bids in Group B and C and two bids from Group D and seeks the Board's view on which we should recommend to Ministers for support.

Background

2. The Garden Communities Programme (GCs) exists to help create new stand-alone (or transformational) settlements that will become high quality sustainable places where people want to live and work. This is not just about getting the numbers up – it is about building places that people are happy to call home. A new garden community must be much more than a collection of edge-of-town or isolated housing estates, and place-making and design quality are at the heart of that endeavour.
3. Government already backs 30 GCs (including the six recently announced and Ebbsfleet Garden City) across the country with the potential to deliver nearly 300,000 homes across England. These typically fall into two categories: villages delivering between 1,500 to 10,000 homes, and towns and cities, delivering individual settlements between 10,000 and 23,000 homes. Each project in the programme is locally-led, with central Government providing support to accelerate delivery and increase ambition. These projects are all at different stages of planning and delivery cycles. Ambition is currently at its highest in North Essex, where there are plans to deliver 43,000 homes across three new communities and four local authorities.

Recap from the previous Board meeting

4. At the last meeting (28 March 2019), the Board discussed and agreed the proposed scores for the top five bids in Group A:
 - Not in Scope

- Not in Scope
- Not in Scope
- Not in Scope
- Not in Scope

5. Not in Scope

6. Not in Scope

7. Not in Scope

For Discussion

8. From the ranked list (**Annex B**), there are a number of bids that have scored well across all criteria set out in the prospectus; a range of bids that have score well across most criteria and demonstrated good potential to be future GCs, (particularly in respect of specific criteria such as the distinctiveness or type of innovation in their offer; strength of deliverability; strength of local leadership qualities; strategic fit) and those bids that scored less well on a number of aspects. It is noted that overall scores are separated in some cases by only 0.5 or 1.0 points reflecting the close nature of the quality of bids in Groups A, B & C.
9. In deciding on the which bids to recommend to Ministers, it is useful for the Board to consider the diversity in their characteristics and how they fared when evaluated against the various criteria, in addition to their overall score. This is useful in achieving a balanced portfolio of GV projects in the programme. Having a range of type of GV projects in the programme is beneficial in terms of expressing the range of quality approaches to new settlements that can be achieved and having projects at different stages in the development cycle to maintain momentum in delivery of new homes through the programme as well as enabling learning from projects at a later stage in the planning & delivery cycle to benefit those at an earlier stage.
10. In considering the scores for each of the GV bids, it is useful to focus on the details behind the headline scores and the scores for individual criteria to ensure that the diversity of the bids is fully understood and reflected in any recommendations to ministers. This is particularly relevant to exceptional qualities in light of the Prospectus statement that *'...will consider proposals for Garden Villages (1,500-10,000 homes) which are particularly strong in other aspects. For instance, demonstrating exceptional quality or innovations, development on predominantly brownfield sites, being in an area of particularly high housing demand, or ability to expand substantially further in the future.'*
11. An information pack for each GV bid to be discussed by the Board (in **Annex C**) highlights the following:

- Scale and key components of the proposed GV; plus, whether it is a transformational project (i.e. will provide economic, environmental & social outcomes for the wider settlement it forms part of), or a stand-alone garden village.
 - Comments underpinning the related assessment criteria scores, highlighting what exceptional qualities (if any) the GV displays over & above the garden community qualities required
 - Geographical location
 - Whether bid has been submitted by private or public sector
 - Stage in development & delivery cycle it is at
12. It would be helpful for the Board to discuss at the outset, the overall diversity and qualities of garden village proposals it feels would be useful to include in the programme in the interest of achieving a balanced portfolio.
13. To help inform the Board discussion on diversity & range of qualities exhibited by the bids, a broad summary of how they have scored against the criteria is included in **Annex D** highlighting areas they scored exceptionally well or poorly:
- Demonstrating scale & exceptional quality or innovation including development on predominantly brownfield sites, being in an area of particularly high housing demand, or ability to expand substantially further in the future
 - Strategic fit;
 - Strong local leadership including excellent community engagement;
 - Achieving Garden Community qualities (these were listed in the Prospectus)
 - Strong deliverability potential

Financial Implications

14. S43(2)



15. S43(2)



Recommendations

16. The Board is asked to:

- **Select a final list of garden village bids to recommend to Ministers for inclusion in the Garden Communities programme. (Note that these will be subject to a check on local authority support post-local elections).**
-
- **Note the financial implications if the recommended Garden Villages are accepted on to the programme.**

Next steps

- **Mid-June** – announcement of new Garden Villages – subject to Ministers' decisions

DRAFT

Annex B – Breakdown of the ranking list

Group A – these are bids which scored very well across all the criteria – i.e. 66 points or above – and the moderation panel consider them eminently suitable to join the Garden Communities programme. Six bids fall within this category. Four of these bids are for free-standing garden village proposals, and two are transformational garden villages; all are at different stages in the delivery cycle.

Group B – includes bids that are promising and have scored well across most criteria scoring 59 or more points. seven bids fall within this category. These bids are a mix of three free-standing and four transformational garden village proposals, all at different stages in the delivery cycle. The moderation panel considers that overall these bids have merit; are a good match for the programme and could also be invited to join the programme.

Group C – includes bids that scored between 50-58 points. 14 bids fall within this category. Nine of these bids are for transformational garden villages; and Five are for free-standing villages These bids scored less well in one or more criteria, including a number of zero marks, however the moderation panel believes that some of these bids show particular merit in different criteria and that consideration should be given to inviting some of them to be part of the programme, e.g. those that demonstrate exceptional quality or innovations, are predominantly brownfield sites, are in an area of particularly high housing demand, or demonstrate the ability to expand substantially further in the future.

Group D – includes bids that have scored less than 50 points and that the moderation panel do not believe are a good match for the programme at this stage. Many of these proposals are at an early stage in development which has been reflected in the bid information submitted about them

BaSRAG Response to Stroud District Council Local Plan Review June/July 2021

Objection to site allocation PS36 Sharpness new settlement

Annexes

Annex 5 BaSRAG response to the Additional Housing Consultation stage

BaSRAG Response to the 'Additional Housing' consultation as part of SDC's review of the Local Plan

You will be aware from our consultation response to the Draft Local Plan that we believe that it makes no sense to build the vast majority of the new housing in the south of the District, when there is envisaged significant growth between Gloucester and Cheltenham for economic and industrial development (ref: Vision for Gloucestershire 2050).

At that time we added that while we understood that the Council has a Duty to Co-operate, and that a significant area of land at Whaddon is preserved for Gloucester's use, it would appear to make more sense to build at areas such as Whaddon and Hardwicke, close to existing employment zones and infrastructure, to help Stroud's need. Then, from a County perspective, concentrate Gloucester's growth to the north of the city.

Building upon those views and in response to the 'Additional Housing' consultation we support the strategies A and C as presented - namely to intensify housing at the locations shown - i.e Hardwicke, Stonehouse and Cam - and to provide new growth points at the two locations named - PGP1 in the Severn Vale and PGP2 on Gloucester's urban fringe. In line with our previous comments we believe these locations to be more sustainable than the location identified in the Draft Local Plan (DLP) at Sharpness. A hybrid approach combining Option A and Option C is entirely consistent with our argument that any development should be sustainable in terms of employment, transport links and other infrastructure. Increasing densities at sites adjacent to existing urban areas and the new potential growth points further up the A38 and more accessible to the county's economic growth centre at Gloucester and Cheltenham tick those boxes far more than 5,000 houses built on the banks of the Severn, remote from any significant employment opportunities or major transport links.

However, we do not see the new locations in the Severn Vale and intensification of existing allocations as simply the answer to the potential need for additional housing. The new locations in particular should be seen as more sustainable alternative sites to the Sharpness allocation identified in the DLP. There is uncertainty as to whether additional housing will be required following the outcry - not least by many Conservative MP's including Siobhan Baillie for Stroud - against the unfair, poorly evidenced and undemocratic proposals contained in the Planning for the Future White Paper. There is the opportunity to revisit the whole Local Plan strategy taking into account the latest evidence and the whole range of sites now 'available'.

Your own Sustainability Appraisal shows the new settlement options at Whitminster and Hardwicke/Moreton Valence in the Severn Vale to be at least equally sustainable as those at Sharpness and Wisloe. The table at Appendix 1 compares the sites with a simple substitution of scores for the symbols used in your version. As can be seen, when those scores are totalled all the sites are closely comparable. However, as noted in the SA, much of the comment leading to those conclusions is subjective and we do not necessarily agree with those conclusions. Many of the assertions regarding Sharpness for example, seem to assume that infrastructure, new services and facilities and adequate employment will all come forward in a timely manner to match the housing provision. That is not the experience we see in the delivery of large housing sites, where often the provision of infrastructure for transport, education, health etc lags considerably behind housing provision, if delivered at all, leading to poor sustainability of developments. Given the isolated location of Sharpness, (as noted often in the SA), relative to the newly proposed settlements in the Severn Vale, its sustainability is relatively poor.

The Severn Vale proposals are far better located for access to existing employment opportunities, primary retail, health and education facilities via existing transport links. These sites are well located in close proximity to two major transport arteries, the M5 and A38, and have easy access to the motorway via junctions 12 and 13. Nearby rail stations in Gloucester and Stonehouse also provide for easy access by rail travel to all parts of the country. There are connections west into Wales, north to Birmingham, east to London and south to Bristol. Rail access to the South and South West (Bristol, Bath, Exeter etc) would also be improved by the proposals for reinstating the station at Stonehouse on the Bristol to Gloucester line and the potential exists for a rail halt/station nearer at Hunts Grove where land for a station is reserved. In our view these proposals are in a better position to receive funding than the unrealistic proposals for reopening the Sharpness branch line and building a new station at Sharpness which would only have direct connections to the North, the branch line to the South having been closed and removed in the 1960s. As we understand things, the developers application to the Restoring Your Railway Fund for feasibility study funding has failed on two occasions indicating a lack of government support for this scheme.

By the way, we find it entirely disingenuous that you have included the proposed rail link from Sharpness on your diagrams of the main options, when there is little or no realistic possibility of it coming to fruition in the short to medium term, if at all. No other proposed transport links are indicated, so why is this one? Its inclusion is misleading.

The Gloucestershire Vision 2050 envisages the major focus for economic growth in the County to lie between Gloucester and Cheltenham. The Severn Vale proposals are in a much better location to serve and benefit from that growth, whereas the Sharpness/Wisloe

proposals are more likely to depend on employment opportunities out of the county towards Bristol. The Severn Vale proposals can help to minimise travel and support local industry both nearby at Stonehouse and Gloucester and at the growth hub between Gloucester and Cheltenham. This contrasts with the development proposals at Sharpness and Wisloe, which would serve to house a population that looks to the South for work, a large proportion of whom are likely to commute to Bristol along existing congested roads and junctions making little contribution to the economic growth of Gloucestershire.

With regard to potential environmental damage we believe that the proposed Sharpness Garden Village (SGV) would be far more damaging than the proposals for development in the Severn Vale at Whitminster and Hardwicke/Moreton Valence. The SGV sits in the Berkeley Vale between the A38 and the River Severn in the estuarine grazing marshes and sandstone ridge landscape characters. This a peaceful, remote and largely unspoilt landscape that is sensitive to change and is visible across a wide area from within Stroud District and from across the Severn estuary in the Forest of Dean. In contrast the area around Whitminster and Moreton Valence lies within the extensive rolling agricultural plain landscape character area. This landscape has been partially degraded by relatively recent developments, with the M5, A38, the waste incinerator and significant industry such as Quedgeley West Trading Estate, Smiths Waste, and Downtons making prominent incursions into the landscape. The Sharpness proposals are in close proximity to protected wildlife assets of the Severn Estuary (RAMSAR, PSAC, SSSI) that will be adversely affected by the scale of development proposed. However, the Severn Vale proposals are not in close proximity to such major environmental assets and the biodiversity has been degraded by the various developments in this area referred to above. In our view further housing development in this area will have far less environmental impact than that proposed at Sharpness.

Finally, we support the views of the Hamfallow Parish Council in that there is the issue of safety and, again, we need to make comparisons with the situation for the proposed Berkeley Cluster. The Severn Vale proposed development at Whitminster and Moreton Valence would not be at risk from any major industrial hazards that we are aware of. The Berkeley Cluster, however, would be at risk from the storage of explosive ammonium nitrate (AN) at Sharpness Docks and the intermediate level radioactive waste stored at the Berkeley Nuclear Site. We accept that these risks are currently assessed to be low, but that may not be how it is perceived by potential house buyers. We are also aware that the Health and Safety Executive are currently reassessing the risks from AN storage after the Beirut explosion. Turning to flood risk, this must be relatively high and increasing at Berkeley where the development is on the very edge of the flood plain. In contrast, the Severn Vale area is well above sea level and flood risk should be negligible.

Given the above it follows that we do not support the identification of a reserve site or sites. We believe a review of the overall strategy and re-assessment of the differing site options should be undertaken immediately. Circumstances have changed significantly since the Council set out on the Local Plan Review, particularly in the context of the housing requirement, new sites having come forward and emerging evidence that was not available at the outset of the process. A strategy has been followed that was not adequately evidenced and there is now the suspicion that the evidence is being made to fit the strategy rather than leading it.

In addition, it is difficult for the public to understand the need for a reserve site when developers are so adamant in putting forward their proposals that they can and will deliver the housing they propose. There is in any case the option to review the plan every five years. Interestingly, if the government brings forward its proposals in the White Paper, then sites allocated in the Local Plan will effectively receive planning permission and the need to trigger bringing a reserve site forward would be negated for that reason.

Of the five new sites suggested in the consultation only two have direct relevance the supporters of BaSRAG. The proposed housing sites at Hook Street Farm (BER016) and Bevans Hill Farm (BER017) closely relate to the west of Berkeley and would contribute just 60 dwellings to the much larger numbers (4,590dw to 2040; 7,190dw to 2050) already proposed for the Berkeley Cluster in the draft Local Plan. Whilst we have no particular objection to those two proposed sites we are not convinced of the necessity for them. This comment aligns with our previous comments in which we ask for sensible and sustainable levels of development in the Berkeley and Sharpness area.

In summary ...

- If additional housing is required, we support a hybrid solution of options A (intensify housing within urban extension sites) & C (additional growth points)
- These new growth points at Whitminster and Moreton Valence / Hardwicke are far more sustainable in terms of employment potential and infrastructure than the one proposed at Sharpness
- We do not support the approach of identifying a reserve site or sites in case allocated sites do not come forward. Instead you should be reviewing the whole Local Plan in the light of the significant potential new sites and evidence that has belatedly emerged since the original proposals.

Please ensure all our submissions are placed before the Inspector.

BaSRAG Response to Stroud District Council Local Plan Review June/July 2021

Objection to site allocation PS36 Sharpness new settlement

Annexes

Annex 6 BaSRAG response to the Draft Local Plan Consultation stage

**Submission on behalf of BaSRAG
(Berkeley and Sharpness Residents' Action Group)**

Following public meetings in December 2018 and January 2019, BaSRAG (Berkeley and Sharpness Resident's Action Group) was formed to represent the views of local residents.

Our position was, and remains, that:

1. We believe the Berkeley and Sharpness area is not a suitable location for the scale of development being proposed in the Emerging Strategy Paper (Nov 2018) of the Stroud District Local Plan Review.
2. We believe the council has not provided robust evidence to support its proposals for new development in this area under the Emerging Strategy of its Local Plan.
3. We want sensible and sustainable levels of development in the Berkeley and Sharpness area.

As a result of that position, we have the following objectives:

1. To be the voice of concerned residents of Berkeley/Sharpness with regards to the Local Plan review.
2. To ensure a fair process is being followed and local people are made aware of new developments in the Local Plan review process.
3. To ensure all the evidence put forward by the council to justify any revisions of its Local Plan is clear and robust.

Following the end of the previous consultation (to the 'Emerging Strategy' phase) we engaged with the Council's planning officers over various issues. Unfortunately, this has not resulted in any – from our point of view – improvement in the proposals for our area; in fact, quite the reverse, in the sense that you have added a further 2,600 houses to the so-called Sharpness Garden Village, to be delivered in Phase 2 up to 2050.

To summarise our objection to the proposals for site PS36, we believe the key issues include:

- Process
 - There is confusion between an Emerging and a Preferred Strategy which we have discussed at length. We believe the omission of a Preferred Strategy stage is detrimental in the whole process.
 - The original four positions described in the original Issues and Options consultation and which had been subject to sustainability appraisals and other studies were replaced in the Emerging Strategy with a 'hybrid' strategy, which had not received the same level of detailed scrutiny.

- At the Emerging Strategy stage, the Council relied entirely on the developer's marketing material for their description of the Sharpness development.
- There has been a lack of response to the previous consultation round, not giving the public the opportunity to understand the Council's attitude to the opinions they had expressed, other than some anodyne comments in the Emerging Strategy Consultation Report – Part Two which was published at the same time as the Draft Plan for Consultation.
- This report was one of many apparently rushed out in the weeks preceding the Draft Plan for Consultation, which gives the strong impression of an attempt at providing post facto evidence to justify the Council's proposals.
- It cannot be congruent with feedback previously given to the Council with those consulted favouring a dispersal option, that there should be two growth points in the south of the District.
- We do not understand why SDC has chosen to include in the plan the extension of the period of the plan to 2050 from 2040 for a second phase of development at Sharpness. You assume the same building rates as defined in 2020. The demand for housing in that decade is not likely to be the same as the current demand as the population of the UK is declining (ref Office for National Statistics).
- All of the above suggests a strong democratic deficit, denying the public proper opportunity to examine and discuss any evidence that might support the Draft Plan proposals in a timely fashion. It appears that the Council has arrived at a settled position which includes having the Sharpness development as the centrepiece of their strategy. To make any significant changes to the proposals at this relatively late stage would be highly undesirable for the Council, whatever the public view.

- Employment

- In an area previously deemed by the Council to have very limited opportunity for employment growth, how can 10 hectares of land dedicated to business use, together with some element of people working from home really provide enough work in the area to prevent a very significant increase to commuter traffic (see below)? As stated in the 2015 Local Plan, "the former employment allocations have not been taken up as envisaged in the 2005 Local Plan and accessibility remains an issue."
- Also due to the remoteness of the proposed site your assessment in the Core Strategy Discussion Paper: Towards a "Preferred Strategy" Potential locations for strategic growth (2011) was that there was "Very little market demand for employment development in this location." Nothing has changed since then!

- Transport

- There is only one road in and out of the proposed Garden Village. That road is considered barely adequate for existing needs. There is real confusion between the position of the planners, who say the current Berkeley by-pass will be extended to the A38 as proposed in the 1980's, and the developers, who say they will not provide any improvement to roads, as that will only encourage residents to use their cars. How can residents reach an informed view without clarity on this point of huge present and future local concern?
- The studies shown in the Issues and Options paper deemed that the transport infrastructure in the Berkeley/Sharpness area was the least suitable of all those considered.
- Located where we are in the District, the majority of commuters currently travel south to the Bristol area, competing for access to the already heavily congested junction 14 of the M5, while those travelling north join the M5 at junction 13 which also has considerable congestion issues. These junctions are likely to require considerable upgrading work at considerable cost.
- The proposed railway station or halt and link to the main line at Berkeley Road will, even if it happens sometime in Phase 2, post 2040, only provide a potential solution for those commuters travelling north to Gloucester.
- It is unrealistic to think people travelling to Bristol for work will catch one train to Cam and then wait for a further connecting train south, when they can reach the city more easily - and quickly - by car. In addition, no evidence has been provided by the council or the developers to prove that reopening the railway line is viable and/or affordable. It is therefore, in our view, misleading for the council to say at this stage that this will happen.

- Environment

- We copied you in on our communication with Natural England regarding our concerns regarding the potential impact on the Severn Estuary SSSI, SPA, SAC and RAMSAR site. Those concerns remain having not been addressed to date.
- In turn, we note from the Habitats Regulation Assessment dated 29th November 2019 that adverse effects cannot be ruled out and that it was recommended to 'establish the extent and nature of the impacts, and their combined effects on the site, and then what avoidance and mitigation measures may be possible, and how they can be justified and supported by evidence' before it is decided whether it is possible for a settlement to be developed at Sharpness.

- We note also the cursory mitigation measures the developers are proposing in their updated documents and suggest that these are totally inadequate.
 - It is not possible to mitigate against the loss of green fields once they are built on. The loss will have a negative impact on uptake of CO2, habitats for wildlife and birds, who will also then have to suffer building noise and light pollution, and the mental health of local residents in a landscape being radically transformed for 25 years.
 - It is acknowledged that part of the area is in a flood risk zone but that no dwellings will be built there. However, it is unclear whether the effect of a likely rise in river levels due to the climate emergency has been taken into account.
- Education
- A Secondary school is not planned until Phase 2, after 2,400 houses have been built with resulting demand for education, when existing secondary schools are already full and families already in the area are struggling to place their children in a school of their choice. What provision would be available for secondary school age children in the intervening years?
- Local housing need and communities
- We understand, of course, that a development of this size is to help satisfy the housing requirement of the District as a whole, rather than to meet any need of the immediate locality. However, we have seen nothing that provides comfort that the type of housing would be affordable for young people in the area hoping to buy their first home.
 - Indeed, a member of the team representing the developers advised us that one can have infrastructure or 'affordable housing', but not both!
 - Effectively, the character and nature of the separate communities of Berkeley, Sharpness, Wanswell and Brookend would be destroyed by them being joined up in a new town approximately five times their current combined size.

We remain of the opinion that the proposals for PS36 represent a politically expedient solution providing a high proportion of the District's housing requirement in an area which is totally unsuitable from an employment, infrastructure and environmental point of view.

It also does not appear to reflect SDC updated priority issues, i.e.

- Moving the District towards becoming Carbon Neutral by 2030.

- Ensuring new housing development is located in the right place and supported by the right services and infrastructure.
- Conserving and enhancing Stroud District's countryside and biodiversity.
- Maximising the potential of brownfield sites to contribute to housing supply.
- Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment.
- Addressing the lack of affordable housing the District.

This political expediency, at the outset, may have been partly driven by a misperception that the community here would offer little resistance. The responses to this consultation, along with those in the last round, show that is certainly not the case.

We believe that it makes no sense to build the vast majority of the new housing in the south of the District, when there is envisaged significant growth between Gloucester and Cheltenham for economic and industrial development (ref: Vision for Gloucestershire 2050).

While we understand that the Council has a Duty to Co-operate, and that a significant area of land at Whaddon is preserved for Gloucester's use, it would appear to make more sense to build at areas such as Whaddon and Hardwicke, close to existing employment zones and infrastructure, to help Stroud's need. Then, from a County perspective, concentrate Gloucester's growth to the north of the city.

For the record, we have no significant objection to the proposals at PS33, PS34 or PS35. when set apart from PS36.

We would ask that our previous correspondence be reconsidered as part of this consultation, as well as documents 550 and 550b (submitted by one of our members), as these documents explore the above issues in greater depth. We would also request that our submissions are made available to the Inspector in due course.

21st January 2020.