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15<sup>th</sup> January 2019

Dear Sir/Madam

**Representations to Stroud District Local Plan Review Emerging Strategy (November 2018)**

This representation has been prepared by Ridge and Partners LLP on behalf of Sharpness Development LLP in response to Stroud District Council’s consultation on the Local Plan Review Emerging Strategy paper (November 2018).

Sharpness Development LLP is promoting approximately 330 hectares of land at Sharpness for a new settlement in Stroud District.

The consultation asks whether the main issues for Stroud District have been identified and whether the potential strategy proposed is suitable to address those issues and meet future development needs. A response to the questions of relevance is set out below.

**Local economy and jobs...**

**Question 2.1a Do you agree with the ways in which the emerging Strategy intends to support the local economy and the creation of jobs?**

There is currently a need for new employment land in Stroud District as many of the existing employment sites are now of some age and not suitable for modern business purposes. New sites are required within the identified growth zone that will provide flat and accessible employment sites near to major transport links. We agree with the Emerging Strategy’s approach to supporting the local economy, particularly the approach to planning new employment and housing together where possible. Such an approach will help to create new sustainable communities and will help to reduce the potential for out commuting.

The development of sites such as Sharpness which can provide 10 hectares of new employment land, alongside new residential development, provides an exciting opportunity for the District. This new 10ha site will enable the provision of a modern, serviced employment site that will be attractive to a wide range of business user’s due to the fact it will be located in an accessible location and will provide modern facilities and buildings. The Home Builders Federation Calculator also identifies that a development of 2,400 dwellings, for example, could support the employment of 7,440 people, thereby providing a significant boost to the economy in this regard.

A local need for housing...

**Question 2.3a Do you agree with the ways in which the emerging Strategy intends to meet local housing need?**

Overall, we support the Emerging Strategy's approach to meeting housing need through the provision of at least 638 new homes per year for a 20-year period. This appears to be in line with the National Planning Policy Framework (NPPF) which states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. However, we would also like to take this opportunity to reiterate that this is a minimum number of homes to be delivered over the plan period and that the Government is looking to significantly boost the supply of housing (paragraph 59).

The importance of affordable housing provision is also acknowledged. However, as identified at paragraph 34 of the NPPF, it is important that any policies relating to development contributions and affordable housing provision do not undermine the deliverability of the plan. It is therefore important that the Council undertakes an updated viability appraisal as part of the Local Plan Review.

Whilst it is acknowledged that local planning authorities have the option to set minimum space standards for new housing developments, we would highlight that the Planning Practice Guidance states at Paragraph 020<sup>1</sup> that planning authorities should provide justification for such policies and should take account of the following areas:

- *"need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."*

It is therefore important that these points are fully assessed by the Council before proceeding with minimum space standards in the Local Plan Review to ensure that such policies do not impact on the timely delivery of development.

Finally, we also agree with the objective to secure a mix of dwellings on Local Plan housing sites in proportion to meet identified local needs including housing for young people as well as those who may be retiring. However, it is important that the Local Plan Review does not seek to require a specific housing mix on individual Local Plan sites as this could impact on the delivery of developments depending on market indicators at the time.

The emerging growth strategy...

**Question 4.2a Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?**

The emerging growth strategy identifies that at least 12,800 dwellings will be delivered over the next 20 years. It seeks to concentrate housing growth at the main towns of Cam, Dursley, Stonehouse and Stroud in tandem with

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<sup>1</sup> Paragraph: 020 Reference ID: 56-020-20150327

new housing and employment growth centred at two new settlements, one of which is Sharpness. Modest growth is also suggested at Berkeley, Minchinhampton, Nailsworth and Painswick.

As identified earlier, we fully support the proposed approach of the emerging growth strategy particularly with regard to the proposals for a new sustainable settlement at Sharpness, which identifies around 2,400 dwellings and 10 hectares of employment land (and other facilities) to be delivered over the plan period. It is considered that the allocation of a new settlement at Sharpness will enable a good proportion of the housing and employment needs of the District to be met on a site where new infrastructure can be planned comprehensively and delivered in a sustainable manner from the outset.

Furthermore, whilst Sharpness Development LLP fully support the proposed allocation of land at Sharpness for 2,400 homes, it is also worth noting that growth in the range of 2,400 - 3,500 homes over the Plan period could also represent a realistic proposition to meet the District's housing needs over the plan period. This should be considered in the context of overall growth of around 5,000 homes, to be delivered beyond the Plan period.

A new settlement at Sharpness provides a unique and exceptional opportunity for sustainable growth as it can, for example, deliver a wider range of sustainable benefits including the opportunity to create a happy and healthy community for all people via:

- the creation of a highly energy efficient community that will have reduced energy demands, improved building construction, renewable energy, aims for zero waste and efficient use of water across the scheme
- use of natural and renewable materials throughout the development;
- opportunities for local food production as part of the development;
- strong green infrastructure links
- segregated cycling and pedestrian routes to prioritise alternative forms of transport; and
- opportunities for new and improved localised rail links,

The creation of a new settlement at Sharpness offers the chance to create buildings that people will want to live, work and recreate in with the overall aim of creating a vibrant and resilient community with a strong sense of local distinctiveness. Such a development will work with nature, rather than against it, through a network of green infrastructure that will enable the creation of improved habitats, new recreation areas and an urban farm. Overall, Sharpness Development LLP's aim is to create an exemplar development for the region.

As we have previously identified in earlier representations, such opportunities are harder to achieve with 'bolt on' urban extensions to existing areas. Urban extensions are often less distinctive and place a greater burden on the existing infrastructure of the area with limited opportunities to secure the new infrastructure that the District needs. The provision of a new settlement is a more sustainable and comprehensive approach to meeting the District's growth needs.

Paragraph 72 of the NPPF identifies support for such an approach stating that *"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities."*

It is also worth noting that further technical work has been conducted with regard to the land at Sharpness which establishes that a new settlement and growth point at Sharpness provides an exciting new opportunity for growth in the District that is capable of being delivered within the Plan period.

As previously highlighted in earlier representations, Sharpness Development LLP considers that land at Sharpness could deliver around 5,000 new homes overall. New housing would be delivered through a series of inter-linked neighbourhood areas, together with a comprehensive package of accompanying infrastructure to meet housing needs up to 2040 and beyond and the new employment land will be delivered as a business park within the heart of the new settlement.

Overall, Sharpness can assist in accommodating the immediate needs of the District up to 2040 as well as providing the opportunity for a planned growth point beyond this period, thereby providing greater certainty on future growth in the District.

**Question 4.2b Do you support an alternative strategy approach?**

As above, Sharpness Development LLP supports the strategy proposed in the Emerging Strategy Paper and we therefore have no comments regarding this question.

**Question 4.2c Have we identified the right towns and villages for growth? Or do other settlements have growth potential?**

We believe that Sharpness should be the primary focus as a growth point within the District followed by complementary growth dispersed through the settlements identified in the Emerging Strategy to enhance and maintain the vitality of these smaller settlements.

**Question 4.2d Do you support our approach to addressing Gloucester's housing needs?**

It is considered that Gloucester and the JCS should support their own housing needs in the first instance firstly by utilising the safeguarded land and then by examining SALA sites with the identification of new land within their own area.

**Question 4.2e Do you support an alternative approach to addressing Gloucester's housing needs?**

See above. Given the quantum of land available in the JCS area, it is considered that there is no necessity for Stroud to play a role in the provision of land for Gloucester's development needs.

**Settlement hierarchy...**

**Question 4.3a Are any of the settlements in the wrong tier and, if so, for what reason?**

Whilst the current hierarchy-based approach is considered appropriate, Sharpness is currently classed as a Third Tier (Accessible Settlement with Limited Facilities) in the Settlement Hierarchy. However, it is considered that there is clear potential for Sharpness to become a Second Tier Settlement given that the Hunts Grove urban extension allocation for 750 dwellings was anticipated to be a Second-Tier settlement in the current Local Plan. As previously identified, development of a new settlement at Sharpness will enable significant level of new development including 10 hectares of employment land and associated infrastructure. This, in turn, will enable the opportunity to provide residents with jobs, infrastructure and services and facilities close to home thereby reducing the need to travel to other local centres and helping to limit the impact of development on the transport network and environment.

**Making places: mini visions and priorities for your area...**

**Question 5.0a Do you support the proposed mini-visions for your area(s)?**

We fully support the proposed mini vision for the Berkeley cluster, particularly in respect of the proposals for the development of a new community at Sharpness which will make a significant contribution to meeting the housing and employment needs of the District. It is agreed that proposals for a new settlement will create a step change in services and facilities available to the local area and will deliver a truly sustainable pattern of living for new and existing local residents. The proposals will complement and not compete with existing facilities in the local area and will support the vitality of existing services and facilities in Berkeley.

**Making places: potential sites and alternatives...**

**Question 5.1a Assuming some growth is desirable, have we identified the best site(s) at each town and village?**

Within the Berkeley Cluster, land at Newtown and Sharpness is identified as a potential site to accommodate up to 2,400 dwellings by year 2040, 10 ha employment, retail, community uses and open space under reference PS36: South and east of Newtown and Sharpness.

However, the red line plan does not reflect all of the land as promoted by Sharpness Development LLP. As such, an updated site location plan is enclosed with this representation which demonstrates the land that is within the control of Sharpness Development LLP and is currently being promoted. It remains that this land is able to deliver between 2,400 – 3,500 dwellings as well as 10 hectares of employment land, retail, community uses and open space over the plan period.

Overall, Sharpness Development LLP consider that the identification of a new settlement at Sharpness, in tandem with some growth at the tier 1 and 2 settlements and dispersal to smaller settlements (where this is in proportion with the scale and character of that settlement) represents the most appropriate strategy to meet the District’s housing needs.

I trust this representation is of assistance. We look forward to the further development of your plan in due course and would welcome the opportunity to engage with you on the proposals at Sharpness moving forward. I would be grateful if you could acknowledge receipt of these representations and please do not hesitate to contact me if you require any further information.

Yours sincerely,



Partner

For Ridge and Partners LLP