

www.ridge.co.uk

20th July 2021

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud GL5 4UB

Sent via email only

Dear Sir/Madam

Representations to Regulation 19 Consultation on the Stroud District Pre-submission Draft Local Plan (May 2021)

Introduction

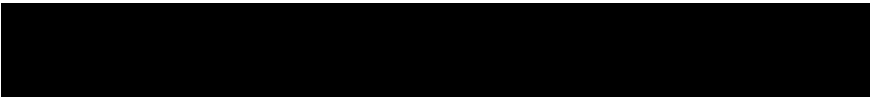
This representation has been prepared by Ridge and Partners LLP in response to Stroud District Council’s Regulation 19 consultation on its Pre-submission Draft Local Plan dated May 2021. This representation is made on behalf of Sharpness Development LLP, the promoter of the new settlement at Sharpness referenced as site allocation ‘PS36’ within the Draft Local Plan and referred to as “Sharpness Vale”.

Overall, these representations set out that the Sharpness Development LLP support the Pre-submission Draft Local Plan, particularly in relation to the allocation of the new settlement at Sharpness Vale under site reference PS36. This representation is also supported and supplemented by separate representations from Stantec in respect of transport and movement, as well as comments from JLL regarding the Consultation Draft Viability Assessment (May 2021) prepared by HDH Planning on behalf of Stroud District Council, both of which are enclosed with this letter.

This letter, and the comments provided by Stantec and JLL, set out that Sharpness Development LLP is supportive of the Local Plan and consider that the plan is sound in the context of the NPPF in that it has been positively prepared, is justified, effective and consistent with national policy. That being said, we would like to suggest some minor modifications which could help to improve the clarity of the Local Plan and these are set out later in this letter, as well as in the accompanying representations referred to above.

By way of background, Sharpness Development LLP has been working on the Strategic Allocation and the proposals for Sharpness Vale for over four years and has undertaken significant work on all technical and delivery aspects of taking forward a development of the scale and type described in the Local Plan, as advised by an experienced consultant team.

The proposals for Site PS36 offer the opportunity to deliver a scale of development that could become self-sustaining with new infrastructure and the services and facilities required to support a new community within Stroud District. The critical mass associated with the delivery of a new settlement, such as Sharpness Vale, enables the provision of new infrastructure at a scale to benefit both the immediate and wider area. In addition, the proposals will also be designed to allow sustainable growth beyond the period 2040, this will provide a degree of certainty on where and how the District’s future growth can be delivered. The opportunity is unique for Stroud District and will help to ensure a more coordinated and sustainable pattern of development for the future in the District.



It is considered that Sharpness Vale could deliver approximately 5,000 new homes overall, as well as new employment and associated other infrastructure. Sharpness Development LLP's vision is for housing to 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. Overall, site PS36 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 and fulfilling the three overarching objectives of sustainable development, economic, social and environmental, as set out in NPPF.

Sharpness Development LLP and their consultant team have also been working with Stroud District Council officers and have also held discussions and meetings with other key stakeholders that are important to the delivery of the new settlement including, Gloucestershire County Council (GCC), Highways England (HE), Natural England (NE), Environment Agency (EA), Network Rail (NR) and Vale of Berkeley Railway (VoBR).

This work has contributed to the ongoing evolution of the proposals for Sharpness Vale and how it will be suitably and successfully delivered through the Local Plan. Informed by this detailed work and liaison with key stakeholders, Sharpness Development LLP would reaffirm that there are no insurmountable constraints that would restrict the delivery of the proposals and that there are viable and feasible solutions to mitigate the impacts of development. Overall, the proposed site allocation PS36 is therefore suitable, available, and achievable for development in terms of the definition contained in the NPPF.

It is also worth noting that the latest vision document and a number of other technical documents that have been prepared in support of the allocation of site PS36 have been published by the Council as part of this Consultation (under 'Site Promoter Responses and 'Documents relating to PS36 Sharpness New Settlement) and it is understood that these documents will therefore also be submitted to the Inspectorate with the Draft Plan and therefore we have not included them again with these representations.

In addition to the documentation referred to above, these representations are also supported by updated technical evidence and information further demonstrating that the Sharpness Vale proposals are deliverable in the context of the NPPF including:

- Site Plan showing Phases 1 and 2 (dwg ref. P16-0821_14-3T) prepared by Pegasus
- Proposed Recreational Avoidance Strategy prepared by EDP
- Ecology Strategy prepared by EDP
- Winter and Passage Bird Baseline report prepared by EDP
- Flood Model Review Technical Note prepared by Stantec

Below, we set out our suggestions for minor modifications that could be made to the Plan in order to help improve the clarity of the Plan and provide some additional flexibility.

Comments on the Pre-submission Draft Local Plan

Page 32 – 'Garden Village Allocations'

At page 32 of the Plan, it is noted that reference is made to Sharpness New Settlement delivering '**up to 2,400 dwellings by year 2040**' (our emphasis). This is in contrast to the policy wording for the PS36 site allocation later in the Plan (at page 178) which states '**approximately 2,400 by year 2040...**' (our emphasis).

For clarity, it is therefore suggested that page 32 of the Plan is updated for consistency. This is also reflective of the NPPF requirement for strategic policies to provide for objectively assessed needs for housing and other uses as a minimum, and to support the Government's objective of significantly boosting the supply of homes.

Page 138 – Strategic Site Allocation PS36 policy wording

With the above comments in mind, it is also suggested that the policy wording at page 138 (Strategic Site Allocation Policy PS36) is also changed to provide greater flexibility in terms of the delivery of development at Site PS36 over the plan period and to help ensure the plan meets objectively assessed needs as a minimum.

We would therefore suggest the current wording for Policy PS36 is amended at the start of the policy as follows:

1. **At least** ~~Approximately~~ 2,400 dwellings by 2040 (**approximately** 5,000 ~~by 2050~~ subject to Local Plan Review), including 720 affordable dwellings (30%), to address tenure, type and size of dwellings needed within the District and Berkeley Cluster areas.

This revised wording will allow the site allocation further flexibility to provide for additional dwellings to come forward and contribute to overall supply.

It is also suggested that the following is amended, to ensure flexibility as technologies in this regard are rapidly evolving and the zero carbon energy generation for the scheme continues to be developed and will be submitted as part of a future planning application:

12. Zero carbon energy generation to meet the needs of the community **which should include green energy sources such as** ~~including~~ small-medium wind turbines, solar farms and biomass production.

Pages 175-177 – PS36 Site Allocation Supporting text

We would also note that it is important to consider that the NPPF (20 July 2021 update) identifies at paragraph 22 that strategic policies should look ahead over a minimum 15 year period from adoption and that for larger scale developments such as new settlements or significant extensions to existing villages and towns, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

Whilst it is acknowledged that Paragraph 221 of the NPPF goes on to state that this applies only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point of publication of the new NPPF, it is still a consideration that is worth bearing in mind to ensure that the Plan is flexible.

We would therefore suggest that consideration is given to updating the supporting text to PS36 to take this into consideration and enable flexibility for the future by including the following wording:

“The area to which this policy relates (site PS36) will be subject to an early partial local plan review within five years of the date of adoption of the plan. This will allow the Council to address any additional evidence regarding the need and potential for further development in this area and in particular to ascertain whether necessary infrastructure has become available to allow additional land to be brought forward to meet local housing need.”

Pages 175 and 180 - Site PS36 maps

Finally, with regard to the site boundary shown on the map at page 175 and 180, these show an outdated boundary for Phase 1 and Phase 2 of the proposals.

We would therefore respectfully request that the enclosed site plan is referred to and the plans contained at pages 175 and 180 of the Plan are updated accordingly to accurately reflect the site allocation area.

Part 7 - Page 306 - Delivery and Monitoring

Sharpness Development LLP also remain in agreement that the projected delivery rates identified at page 306 of the Local Plan can be readily achieved and understand that the Council is perhaps looking to take a cautious approach to delivery.

However, the LLP would also like to take this opportunity to reiterate that it is considered these figures are not only readily achievable at Sharpness Vale but that they will be able to exceed the delivery rates identified by the Council at page 306 given the potential for multiple sales outlets and the strength of the market.

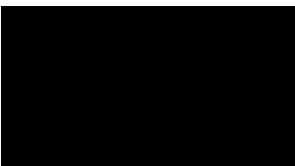
Conclusion

Overall, these representations support the pre-submission Draft Local Plan, particularly in relation to the inclusion of a new settlement at Sharpness Vale under site allocation PS36. It has been set out that there are some minor areas that could be updated to provide greater clarity and flexibility for the Plan moving forward. However, it is considered that the plan meets the tests of soundness as defined by the NPPF overall in that it is positively prepared, justified, effective and consistent with national policy.

As set out earlier, the technical work undertaken to date demonstrates that the proposals are deliverable in accordance with the projected delivery rates set out at page 306 and it is the LLP's opinion that those figures are not only readily achievable but could be exceeded.

Overall, the proposals for Sharpness Vale offer an opportunity for SDC to positively plan for a new, sustainable settlement guided by garden village principles, delivering a scale of development that will become self-sustaining with new infrastructure, services and facilities required to support a new community as well as having the necessary flexibility to accord with economic and technological change.

Yours sincerely



On behalf of Ridge and Partners LLP