

Stroud District Council is starting the process of reviewing the current Local Plan. This consultation is seeking views about the range of issues that the next Local Plan will need to tackle, and options for addressing them. This includes the identification of potential areas for growth and development. We ask a series of questions throughout the consultation document (each of which is numbered). Please refer to the question number and/or topic in your response, where relevant.

You can download a PDF or an editable electronic copy of this form from our website www.stroud.gov.uk/localplanreview. You will also find the main consultation document on this web page, as well as some supporting material and further reading. **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (Local Plan Review: Call for Sites).**

The consultation closes on Tuesday 5th December 2017. Please email completed electronic responses to local.plan@stroud.gov.uk or post paper copies to **Local Plan Review, The Planning Strategy Team, Stroud District Council, Ebley Mill, Westward Road, Stroud, GL5 4UB**. Should you have any queries, the Planning Strategy Team can be contacted on 01453 754143.

Consultation response form PART A

Your details

Thank you for taking part. Please fill out your personal information in PART A. Your contact details will not be made public and won't be used for any purpose other than this consultation. We will not accept anonymous responses. Your comments may be summarised when we report the findings of this consultation.

Your name

(title): <input type="text"/>	name: <input type="text"/>
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Your company name or organisation (if applicable)

Hunter Page Planning

Your address (optional)

Your email address *

<input type="text"/>

Your phone number (optional)

<input type="text"/>

If you are acting on behalf of a client, please supply the following details:

Your client's name

(title): <input type="text"/>	name: <input type="text"/>
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Your client's company or organisation (if applicable)

Greensquare Group

Keeping you updated:

Would you like to be notified of future progress on the Local Plan review? (* we will do this via email)

- | | | | | | |
|------|--|------------|-------------------------------------|-----------|--------------------------|
| i) | When the findings from this consultation are made public | Yes please | <input checked="" type="checkbox"/> | No thanks | <input type="checkbox"/> |
| ii) | The next formal round of public consultation | Yes please | <input checked="" type="checkbox"/> | No thanks | <input type="checkbox"/> |
| iii) | No further contact please | | <input type="checkbox"/> | | |

Consultation response form PART B:

If you have several different comments to make, you may wish to use a separate PART B sheet for each one (although you do not have to). If you use multiple PART B sheets, please make sure you fill in your name on each of them (you only have to fill out PART A once, as long as it is clearly attached to your PART B sheets when you submit the forms to us).

Your name

Your organisation or company

Your client's name/organisation
(if applicable)

The consultation is seeking views about whether the big issues identified within this paper are the right things to focus on and what options exist for tackling them. Are there other issues, options or opportunities that have been missed? **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (download a copy of the sites form at www.stroud.gov.uk/localplanreview).**

We ask a series of questions (highlighted in pink boxes) throughout the consultation paper. Each of the questions is numbered. Please can you reference the question number(s) and/or the topic here:

Question number: See enclosed representation

Please use this box to set out your comments:

(Attach additional sheets of paper or expand this box if you need to)

See enclosed representation.



STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW: ISSUES AND OPTIONS CONSULTATION

On behalf of Greensquare Group and Lioncourt Strategic Land

Our reference: 3284

December 2017

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1.0. INTRODUCTION

- 1.1 This representation has been prepared by Hunter Page Planning (HPP) on behalf of Greensquare Group Ltd and Lioncourt Strategic Land in relation to Stroud District Council's consultation on the Local Plan Review: Issues and Options Paper.
- 1.2 Greensquare and Lioncourt are the joint promoters of approximately 330 hectares of land at Sharpness which is considered a suitable site for a new growth point in Stroud to meet the needs of the District up to 2036.
- 1.3 GreenSquare Group is a pioneering housing, regeneration and social investment agency working throughout Wiltshire, Oxfordshire and Gloucestershire. It is committed to delivering high quality, sustainable homes and customer focussed services for diverse range of people in well balanced, mixed tenure communities. It consistently delivers on its strong commitment to community consultation, place making and social inclusion. The Group manages over 11,700 homes across its operational area and locally through its Gloucester-based subsidiary, Oxboode Housing Association. It has an annual development programme of around 400 homes.
- 1.4 In addition to homes for sale, GreenSquare Group is a major developer of new affordable housing and a lead development partner under the Homes and Communities Agency (HCA) National Affordable Housing Programme (NAHP).
- 1.5 Lioncourt Strategic Land is one arm of the Lioncourt Group, which comprises Lioncourt Homes and Lioncourt Strategic Land. Formed 10 years ago, they are based in Worcester. Lioncourt Homes is rated as a five-star HBF quality Housebuilder (2015, 2016, 2017) and won the HBF Small Housebuilder of the year award 2016. In 2016, Lioncourt Homes delivered just over 200 new homes.
- 1.6 The Stroud District Local Plan was formally adopted by the Council on the 19th November 2015 and sets out the strategy for development in the District until 2031. The adoption followed the publication of the Inspectors Report on the Examination of the Stroud District Local Plan (2nd November 2015) which concluded that it provides an appropriate basis for the planning of the district until 2031 providing a number of modification were made to the plan.

- 1.7 One key main modification was the commitment to an early review of the Plan commencing within five years of adoption or by December 2019, whichever is the sooner, and recognise the possibility of considering the need to assist other local planning authorities in the housing market area in meeting their future unmet objectively assessed development and infrastructure needs.
- 1.8 The Council is now starting the process of reviewing the current Stroud District Local Plan. The Issues and Options version of the Local Plan Review is currently undergoing consultation. This plan presents the opportunity to identify emerging issues and identify ways of distributing and managing future development needs.
- 1.9 The Issues and Options Paper poses a series of questions and this representation aims to specifically answer the relevant questions raised within the report, with specific reference to the promotion of land at Sharpness. A copy of the site location plan is attached at appendix 1.
- 1.10 Accompanying this submission are the following documents which further demonstrate the suitability of land at Sharpness as a growth point to meet the needs of the District:
- Overarching Vision Document for the new settlement at Sharpness
 - Initial Masterplan prepared by Pegasus
 - Transport Strategy prepared by Peter Brett Associates
 - Flood Risk and Drainage Scoping report prepared by Enzygo
 - Ecological Deliverability Report prepared by EAD Ecology

Structure of this Report

- 1.11 Section 2 of this Statement sets out the vision for a new Growth Point at Sharpness.
- 1.12 Section 3 looks at the overarching policy context for the District, the county and the country more generally.
- 1.13 Section 4 considers the most appropriate future growth strategy for the area. It is suggested that the land at Sharpness presents a suitable site for a new Growth Point in the District and further details are provided justifying this position.

- 1.14 Section 5 considers the background evidence and information to inform the review of the Local Plan and identifies the work that Greensquare and Lioncourt are undertaking to help inform that process.
- 1.15 Section 6 provides a summary of the position and conclusion on the site's suitability to meet the District's needs.

2.0. VISION FOR SHARPNESS

- 2.1. The regeneration of Sharpness is a once-in-a-lifetime opportunity; an opportunity to properly plan and deliver a new sustainable, self-contained and thriving settlement that offers the best of town and rural living.
- 2.2. 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.
- 2.3. A place that is strongly rooted in its heritage and landscape; that offers ample green spaces for leisure, food production, wildlife and sport.
- 2.4. A place where it is practical and more convenient to use public transport or to cycle or walk.
- 2.5. A community that allows its residents to live more sustainable lives.
- 2.6. As set out in the accompanying Vision Document, Sharpness Growth Point will challenge existing ways of working and thinking to push the boundaries of residential led design quality to create a highly desirable new place to live in Gloucestershire. For example:
- 2.7. The aim is to achieve a high-quality development with strong identity, activity and 'sense of place'. Sharpness will join other the other desirable areas of Gloucestershire as a place people will want to live and as a destination worth visiting and become an exemplar of national significance for creating large new settlements.

3.0. PLANNING POLICY CONTEXT

National Planning Policy Framework (the Framework) March 2012

3.1. The Framework sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

3.2. The purpose of the planning system is to contribute towards the achievement of sustainable development and as such the Framework identifies three dimensions to sustainable development; economic, social and environmental which are explained as follows:

an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

3.3. The Framework holds a presumption in favour of sustainable development which for plan making means local planning authorities should positively seek opportunities to meet the development needs of their area with sufficient flexibility to adapt to rapid change.

3.4. With regard to Plan making, the Framework requires all new Local Plans to be prepared with the objective of contributing to the achievement of sustainable development trying to achieve each of the economic, social and environmental dimensions. Plans should be

aspirational but realistic and should set out opportunities for development and clear policies on what will be permitted and where.

- 3.5. Local Plans should set out the strategic priorities for the area which should include; the homes and jobs needed in the area; the provision for infrastructure and transport and the conservation and enhancement of the natural and historic environment amongst other things.
- 3.6. Part of the role of the Local Plan will be to allocate sites to promote development and flexible use of land bringing forward new land where necessary and providing detail on the form, scale, access and quantum of development where appropriate.
- 3.7. Crucially Local Plans should plan positively for the development and infrastructure required in the area, which should include meeting household and population projections and addressing the need for all types of housing and having a clear understanding of the business needs of the area providing land and floorspace for economic development.
- 3.8. With regard to the location of new housing development, Paragraph 52 of the Framework importantly recognises that: ***'The supply of new homes can sometimes be best achieved through planning for large scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.'***

Local Policy

- 3.9. The Stroud District Local Plan was formally adopted by the Council on the 19th November 2015 and sets out the strategy for development in the District until 2031. The strategy prioritises opportunities for employment growth and is based on an aspiration that development up to 2031 will generate the equivalent of two new jobs for every allocated home built. It is based on concentrated development, focused on a small number of strategic growth areas, within or adjacent to larger settlements.
- 3.10. The Local Plan currently has five strategic growth locations: at Cam; the Stroud Valleys; south of Gloucester; at Sharpness; and to the west of Stonehouse. It will also support the growth and regeneration of key areas, including the District's main towns of Stroud, Dursley

and Stonehouse; the Cotswold canals corridor; and Sharpness Docks. Furthermore, it aims to achieve the intensification of underused employment resources, particularly within the Stroud Valleys and at Sharpness Docks.

- 3.11. The Local Plan needs to provide at least 11,400 dwellings and between 6,800 and 12,500 new jobs (2006-2031). This gives a job per dwelling ratio of between 0.9 and 1.7.
- 3.12. Within the Local Plan, Sharpness forms part of an identified strategic growth area known as the Berkeley cluster. The Berkeley cluster is made up of a number of parishes which lie in the Severn Vale at the south-western corner of Stroud District, close to the boundary between Gloucestershire and South Gloucestershire.
- 3.13. The Local Plan currently sets out a vision for the regeneration of Sharpness Docks which includes a strategic allocation for up to 300 new homes in association with a leisure and recreation strategy for the north of the Docks and intensified and upgraded employment provision on new and existing sites within the commercial Docks to the south.
- 3.14. In addition, the former Berkeley Power Station site has been redeveloped with the Gloucestershire Science and Technology Park, to include educational, training and research facilities, together with B1-B8 uses and uses associated with the decommissioning process.
- 3.15. It is therefore already identified as an area for new growth and proposals at Sharpness could help to further support the overarching strategy and vision for the regeneration of the Sharpness Docks.

4.0. FUTURE GROWTH STRATEGY

- 4.1. Section 3 of the Issues and Options considers the most appropriate future growth strategy. It recognises that the amount of future housing and employment growth is yet to be identified but looks at the strategy for distributing further growth.

Question 3.1 - How should we meet future development needs?

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

Option 5: Do you have an alternative strategy option that you would like us to consider? Do you have a preferred option? Or would some combination of these approaches be the best way to meet our future needs? Please explain why.

- 4.2. In response to the above question, it is considered that Option 4, a new growth point in the District, is the most sustainable option to meet the District's growth needs.
- 4.3. The majority of 'sustainable development' is currently centred on the expansion and extension of our existing settlements. Inherently, this simply bolts on new development where the local infrastructure is generally out-dated and often has insufficient capacity. This type of strategy also erodes valuable green spaces that residents cherish. Growth of this nature can be unrelated to the historic core of the original settlement and over time can erode the original character of the settlement. Whilst these are obvious consequences of sustainable growth, it often causes uncertainty and anxiety amongst local residents.

- 4.4. A dispersed development strategy provides 'bolt on' urban extensions, with poor non-vehicular integration and limited opportunity to secure the new infrastructure that the District needs. Such a development strategy cannot provide a comprehensive approach to meeting the District's growth needs in a manner that a new Growth Point based on Garden Village principles can.
- 4.5. In our consideration, the identification of a growth point, where new and green infrastructure can be sustainably planned from the outset to accommodate immediate and successive growth should be encouraged. Such a growth point can draw upon new technologies for heating, energy and construction and can lay down the foundations for more sustainable green infrastructure - setting an exemplar development for the region. A growth point provides genuinely mixed communities that should be self-contained so that residents have the ability to live and work in one location.
- 4.6. The introduction of an identified growth point should become recognised as the area for immediate and future growth of the District and this, coupled with an element of dispersed windfall development, should help to significantly boost the supply of new housing and achieve truly sustainable development for the District.
- 4.7. The development of new settlements, such as that being promoted at Sharpness, is an approach supported by national policy. Paragraph 52 of the National Planning Policy Framework states:
- "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 of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development."*
- 4.8. Furthermore, the Chancellor's autumn 2017 Budget highlighted the need to significantly boost house building in the UK to 300,000 new homes a year, an amount not achieved since 1970. As part of this proposal, the government has pledged to create 5 new 'garden' towns.

This clearly demonstrates a desire for new sustainable settlements as an appropriate way of addressing housing needs.

- 4.9. It is therefore clear that a practical solution to address the housing crisis is the renaissance of Garden Settlements. Therefore, we consider that an explicit policy and encouragement on a new growth point offers a unique opportunity, with many sustainable benefits, and should be supported as the best way to meet Stroud's future needs. We believe that the best location for such a growth point is at Sharpness and provide our full support for Option 4.

Question 3.3 a – We welcome views on whether there are opportunities to improve transport links between areas within Stroud District and South Gloucestershire, Bristol and beyond; or to provide new local services; and what development within the District might be appropriate to deliver these.

- 4.10. New development that is more dispersed and in the form of extensions to existing towns and villages, is often only able to deliver community infrastructure on a small scale, and most commonly in the form of financial contributions to existing facilities. However, a new settlement provides clear advantages and opportunities from the outset allowing the comprehensive planning of social, physical and green infrastructure.
- 4.11. As such, in order to provide a range of sustainable alternatives to private cars, it is considered that a new growth point, such as Sharpness, will provide a far greater influence in positively supporting an integrated transport system than a more dispersed development, some with potentially less sustainable networks.
- 4.12. The scale of development created by a new settlement at Sharpness is far more likely to generate enough demand to provide long-term financially viable public transport systems can be put in place and retained, which would not be possible with other options which do not have the potential scale of Sharpness. Transport investment that better connects Stroud's key economic activity areas will also enable Stroud to remain economically competitive nationally.
- 4.13. The land being promoted at Sharpness is already 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. A new growth point at Sharpness can also serve to both reinforce existing services and sustainable transport measures and provide critical mass of patrons of these facilities where development elsewhere would not be able to do so.

- 4.14. There is the opportunity to secure a package of measures such as new bus services enabling residents of Sharpness and other nearby settlements to access a wider range of services by sustainable modes of transport but also significant opportunities to provide new and upgraded pedestrian and cycle connections to encourage new and existing residents of Berkeley and Sharpness to use active travel options first.
- 4.15. Furthermore, development at Sharpness will be of a large enough scale to offer the opportunity to provide residents with jobs, education, health facilities, shops and community infrastructure close to home, meaning a lot of activities and daily needs are served on site, reducing the need to travel to other local centres and limiting the impact of development on the transport network and environment. The initial masterplan included within the accompanying Vision Document sets out how the development will be based upon walkable neighbourhood principles where all facilities are within easy reach of all houses.

Examples of Sustainable Travel improvements that a new Growth Point could secure

- 4.16. Potential improvements would include:
- 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
 - 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 Dock
- improved connectivity to Berkeley with potential links to National Cycle Network Route 41 which routes along Station Road.
- New cycle parking and supporting infrastructure, such as communal bicycle pumps and tools throughout.
- The promotion of electric cars and charging points throughout.
- An opportunity to develop a strategy to embed developing and future technological advances in home, workplace and travel technology via a comprehensive and organic strategic framework. For example, a new growth point could provide a good opportunity to incorporate provision for driverless cars which aren't currently being planned for but could be in the future. A growth point would allow this type of technology to be built into plans, rather than it to be delivered in retrofit.

A catalyst for wider infrastructure needs

- 4.17. Importantly, a new growth point at Sharpness could also facilitate a number of wider infrastructure improvements, acting as a catalyst for the wider consideration of infrastructure growth by the local authorities. The location of the development presents a unique opportunity for authorities on both sides of the River Severn to collaborate on a vision for infrastructure led growth around Sharpness and Lydney with the re-establishment of the former Severn crossing.
- 4.18. For example, a growth point could support the reopening of the Sharpness branch line to serve at least one new rail station. Although any proposals would be subject to detailed feasibility work, a new settlement of some 13,000 new residents with associated schools, shops and community facilities would provide an ideal location for a rail connection, particularly as much of the route is already established. In addition, existing capacity problems at the M5 junctions could be addressed subject to detailed feasibility work.
- 4.19. Development of a new growth point at Sharpness could also help to facilitate a new crossing over the River Severn. Whilst the proposed development alone would not be able to deliver this as the infrastructure cost would be too great and the level of provision would be well beyond that required to serve the development. However, a collaborative approach with

local authorities and stakeholders could result in a locally significant strategic connection, restoring links between either sides of the River Severn which have been lost. It is considered that a number of benefits would arise from a new river crossing including:

- new road link between Sharpness and Lydney would divert some traffic from the existing Severn crossings further south, providing particular benefit to residents in villages along the A48 who currently use the Severn Bridge and then have to route through Chepstow. This would require at least one new junction with the A48;
- If the Sharpness Branch Line were to be reopened to serve the development at Sharpness, there is potential for it to be extended to join the existing rail line in Lydney via the new river crossing. Lydney railway station is served by services between Cardiff provided by Arriva Trains Wales and services to Birmingham and Nottingham operated by CrossCountry. A new rail link could significantly reduce the journey time for rail journeys between Sharpness and South Wales which would otherwise only be available from Bristol or Gloucester
- potential for a bus route connecting the development at Sharpness and Lydney, via the new river crossing. The existing bus routes in Lydney use the A48 and route through Lydney town centre with a loop around the residential areas to the north and south of Newerne Street/ Highfield Road. Part of this route could be included in a new route which serves the development at Sharpness, enabling the residents of Lydney and Sharpness to access the services and facilities in each location.

4.20. A comprehensive package of infrastructure improvements will be employed to enhance the existing network. These will focus not only on providing additional capacity for vehicles, but also on providing priority for sustainable modes of transport. This could include bus lanes, cycle lanes and new shared use foot and cycle ways, electric car charging points as well as potential wider initiatives as detailed above.

4.21. The level of improvements could only be secured with a significant scale of new development such as a new Growth Point at Sharpness. The scale of development would be likely to generate both its own infrastructure funding as well as draw in funding from other sources to deliver needed improvements.

Questions 3.3 b – We welcome views on the most appropriate locations for housing and employment growth on the southern edge of Stroud District. Current Tier 2 settlements in the area are Berkeley and Wotton-under-Edge.

- 4.22. As previously referred to in question 1, this representation seeks to promote the land at Sharpness as a new growth point in the District. It is considered that the land at Sharpness is an appropriate location for new growth at the southern edge of the settlement for a number of reasons. These reasons also relate to Questions 3.3 c and 3.6 and our full response to all of these questions are set out further below.

Question 3.3 c – Do you consider that there is more potential for further growth at Sharpness/Newtown? What are the opportunities and are there any potential barriers to growth?

- 4.23. A significant level of development at Sharpness could provide the opportunity to enhance the existing leisure and tourism activity in the area, with access to Sharpness Marina and the riverfront being especially important, provide new employment, education and associated infrastructure as detailed further below. This is in line with the current development strategy and aspirations of the current Local Plan and therefore the allocation of Sharpness as a 'growth point' offers the opportunity for a quick review of the Local Plan as it can align with the existing development plan strategy for the District with only modest amendments.
- 4.24. New development here would also support the current allocation at Sharpness Docks and the planning application currently under consideration for mixed use development. This seeks permission for 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. Significant further growth in this location would help to support new services and facilities, including sustainable transport modes.
- 4.25. Furthermore, it is acknowledged that the amount of future housing and employment growth is yet to be identified in the Local Plan Review. This also needs to take account of potential

cross border requirements which may arise from Cheltenham, Tewkesbury and Gloucester. The Inspector's report into the Joint Core Strategy for these areas has already identified that Gloucester and Tewkesbury will need to commit to early focused reviews into their housing supply.

4.26. Paragraph 76 of the Inspector's report into the JCS states:

"Whilst the JCS authorities have sought to meet the full housing requirement for the Plan period, it is apparent from the HIS that insufficient sites can be identified at present for Gloucester and Tewkesbury. Overall, against the requirement of 35,175, there is currently a supply of 31,824 dwellings, leaving a shortfall of 3,351. However, there appear to be a number of possibilities for locating additional land and, therefore, focused reviews of Gloucester's and Tewkesbury's supply are proposed.

Gloucester's shortfall is 1,346 dwellings although it has sufficient housing land for the short to medium term and this allows adequate time to consider additional development options both within and outside the JCS area. It is therefore intended to explore opportunities within the urban area, as well as potential new Strategic Urban Extensions (SUEs) in Tewkesbury Borough and Stroud District, taking account of the JCS authorities' Memorandum of Agreement with Stroud."

4.27. As also touched upon previously, and as set out in the accompanying Vision Document, a new growth point at Sharpness would also provide the following key opportunities:

- The development of a new place with a unique identity and character;
- Provision of improved public and sustainable transport options;
- Use of new transport technology;
- Provision of new and improved cycle network;
- Opportunity to provide significant improvements along Station Road and the B4066;
- Opportunity to provide significant improvements within the area for pedestrians and cyclists and countryside links
- Opportunity to deliver SANG to divert recreation away from Severn Estuary SPA;
- Opportunity to facilitate new education;
- Opportunity to support Gloucestershire Science & Technology Park;
- Potential of Waste to Energy/Renewable technologies to support the development;

- Opportunity to deliver serviced land for employment with a range of employment opportunities;
- Ability to deliver a network of new public open space and parks;
- Opportunity to deliver new community and recreational facilities;
- Creation of a high-quality gateways and positive entrance to Sharpness;
- Provision of a range housing types, sizes and tenures;
- Protection and enhancement of nature conservation, heritage and archaeological interest;
- Provision of a strong landscape framework utilising trees and hedgerows on the site;
- Enhancing ecological and landscape features and wildlife corridors;
- Use of sustainable urban drainage systems; and
- Enhancement and creation of key views.

4.28. Our initial technical studies have established that a new Growth Point at Sharpness provides a realistic and deliverable development opportunity. It has the potential to deliver around 5,000 new homes through a series of inter-linked neighbourhood areas, together with a comprehensive package of accompanying infrastructure. A new growth point at Sharpness could provide a reliable stream of housing delivery to help meet Stroud District Council's future housing needs, as well as potential cross border requirements.

Question 3.4 - Do you agree with the current hierarchy-based approach towards identifying settlements suitable for different levels of development? Is there a different approach you would prefer?

Do you agree with the different tiers identified in the current Local Plan and the scale of development proposed for each tier?

Are any of the settlements in the wrong tier and, if some, for what reason?

4.29. The current development strategy advocated by the Local Plan identifies it will support the growth and regeneration of key areas, including the Sharpness Docks.

4.30. 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 of Core Policy CP3. However, it is considered that there is clear

potential for Sharpness to become a Second Tier Settlement if it were to be identified as a new Growth Point as it could potentially be much larger than the Hunts Grove allocation which is currently anticipated as a Second Tier.

- 4.31. As previously identified, development of a new growth point will enable significant level of new development and associated infrastructure. This, in turn, will enable the opportunity to provide residents with jobs, education, health facilities, shops and community infrastructure close to home. As such, a lot of activities and daily needs would be served on site, reducing the need to travel to other local centres and helping to limit the impact of development on the transport network and environment.

Question 3.6 – Do you agree with the potential broad locations for growth?

- 4.32. We are pleased to see that land at Sharpness has been identified as a potential location for further growth to meet the District needs. As set out throughout this representation, we consider that Sharpness provides a unique and exceptional opportunity for a new growth point to secure sustainable development to meet the District's needs to 2036 and beyond. The current development strategy advocated by the Local Plan identifies support for the growth and regeneration of key areas, including at the Sharpness Docks. Further growth in this location would therefore clearly support that overarching strategy.

- 4.33. It is considered that several factors favour Sharpness above alternate locations;
- The allocation of Sharpness as a 'growth point' offers the opportunity for a quick review of the Local Plan as it can align with the existing development plan strategy for the District with only modest amendments;
 - A new growth point option provides clarity on the numbers of homes that will be delivered over the plan period on an annual basis, relative to the delivery of supporting infrastructure;
 - A growth point option provides certainty and reduces risk in relation to land ownership, particularly as growth over the plan period can be properly planned for and released on a phased basis to meet a planned delivery trajectory in a realistic way, with input from the local planning authority;
 - Study area's proximity with major employers, existing and proposed, and is supported by GFirst LEP's Growth Hub Strategy;

- The site falls outside designated Green Belt and is not subject to any other statutory landscape designations;
- GreenSquare's core values are symmetrically aligned with Garden Settlement principles. There is a genuine ethos and motivation to deliver a lasting positive legacy to be proud of;
- Study area's topography is one that is relatively discreet and can accommodate a Garden Settlement without resulting in 'sprawl' or 'coalescence';
- The location lends itself for phased organic development of vernacular character;
- Existing transport links provide a sound base for improved public transport infrastructure; A38 and M5 in close proximity;
- Transportation infrastructure improvements can be delivered to coincide with the priorities of the emerging, neighbouring, West of England Transport Plan; and
- There is overwhelming Government support for new Garden Settlements.

4.34. With regard to the above reasons, we therefore consider that land at Sharpness is clearly a suitable location for further growth in the form of a new settlement.

5.0. BACKGROUND STUDIES

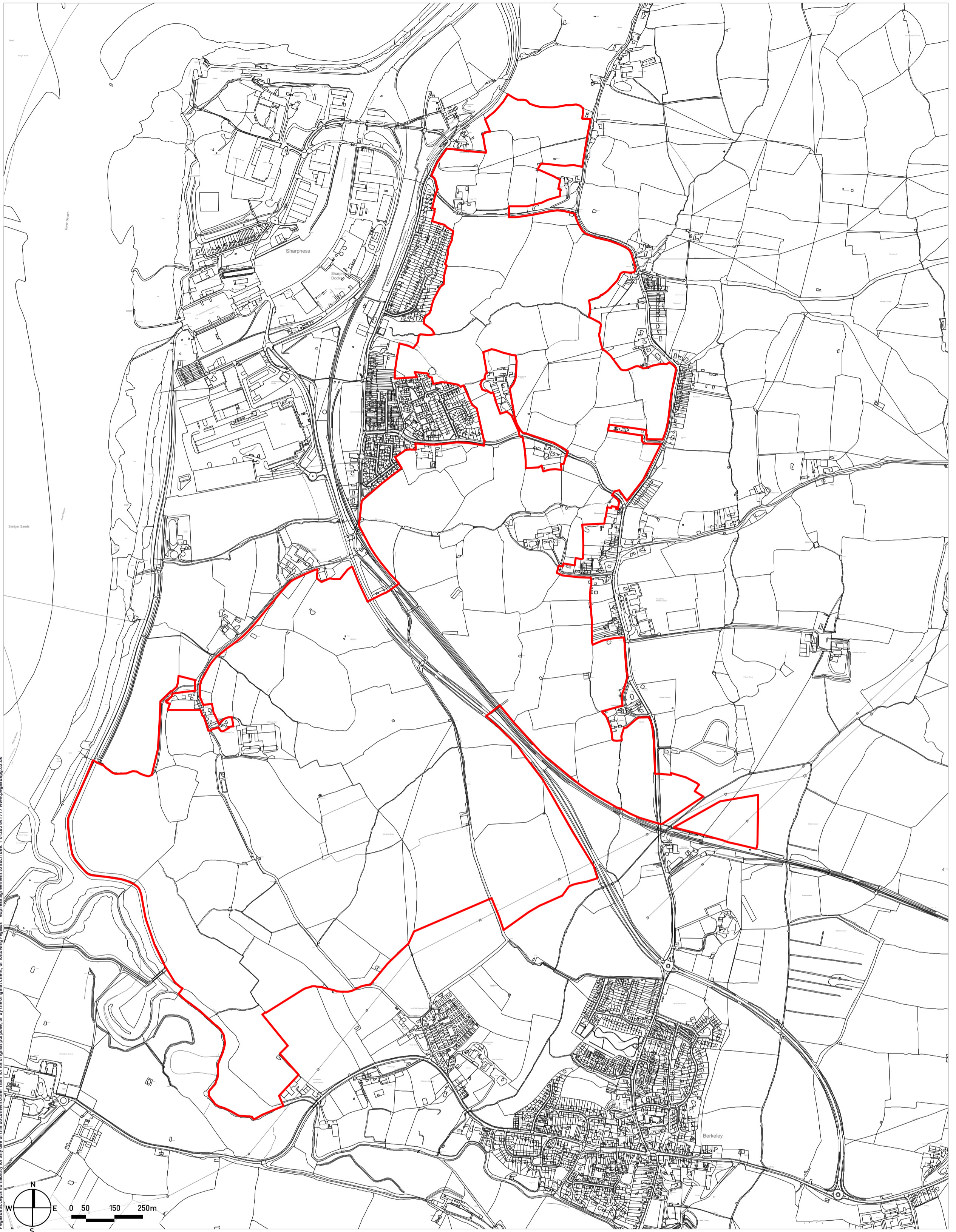
Question 4.1 Are there any specific additional local studies or data that you believe are needed to inform the Local Plan review? Have you any advice on the scope or content of any of these studies? Have you prepared, or are you preparing your own studies, which may help to inform the Local Plan?

- 5.1. Section 4.1 of the Issues and Options identifies that evidence base studies are required in order to identify future needs and generate options for delivery. We agree with this approach and trust that these studies will include land at Sharpness for consideration.
- 5.2. Greensquare and Lioncourt have instructed a team of technical consultants in relation to the development of land at Sharpness. As set out at 1.9, these representations are supported by the following initial technical feasibility studies:
- Initial Masterplan prepared by Pegasus
 - Transport Strategy prepared by Peter Brett Associates
 - Flood Risk and Drainage Scoping report prepared by Enzygo
 - Ecological Deliverability Report prepared by EAD Ecology
- 5.3. In terms of next steps, the consultants are looking to undertake further detailed survey work and would welcome the opportunity to explore these matters further with the Council and how this detailed technical work can help to assist in the evidence base for the Local Plan review.

6.0. CONCLUSIONS

- 6.1. As this representation and supporting documentation has highlighted, the regeneration of Sharpness as a new growth point provides a once-in-a-lifetime opportunity to properly plan and deliver a new sustainable, self-contained and thriving settlement that offers the best of town and rural living.
- 6.2. The development of new settlements is an approach that is supported by national policy. Paragraph 52 of the Framework is of particular relevance which advises that: *'The supply of new homes can sometimes be best achieved through planning for large scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.'*
- 6.1. Furthermore, a significant level of development at Sharpness could provide a package of benefits that a more dispersed development strategy would not necessarily be able to provide. To summarise, a growth point at Sharpness would provide the opportunity to enhance the existing leisure and tourism activity in the area, with access to Sharpness Marina and the riverfront being especially important, as well as providing new employment, education and associated infrastructure. This is in line with the current development strategy and aspirations of the Local Plan. Therefore, the allocation of Sharpness as a 'growth point' offers the opportunity for a quick review of the Local Plan as it can align with the existing development plan strategy for the District with only modest amendments.
- 6.2. It is therefore suggested that, in progressing the Local Plan Review, further consideration is given to the allocation of Sharpness as a Growth Point to meet the future needs of the District.

Appendix 1 – Site Location Plan

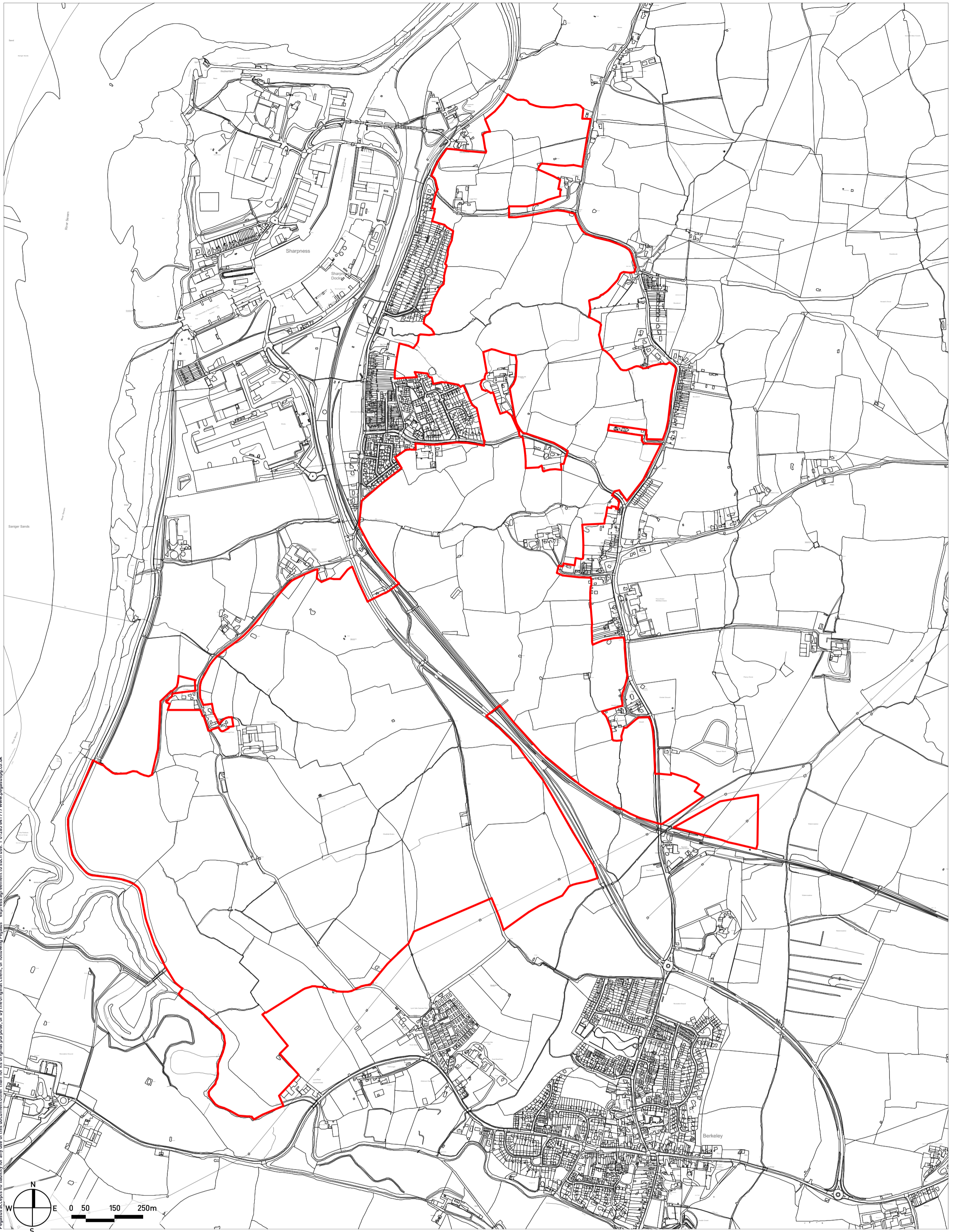


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KEY
 **SITE LOCATION**

SHARPNESS GROWTH POINT - SITE LOCATION PLAN Pegasus





KEY
 **SITE LOCATION**

SHARPNESS GROWTH POINT - SITE LOCATION PLAN Pegasus Design