

Part B – Please use a separate sheet for each representation

Name or Organisation: Vistry Group

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

POLICY CP2 – STRATEGIC GROWTH AND DEVELOPMENT LOCATIONS

Core Policy CP2 states that Stroud District will accommodate at least 12,600 additional dwellings for the period 2020-2040. Table 2 within the Pre-submission Draft Plan shows that, as a result of existing commitments, there is a residual requirement to 2040 of 8,005 dwellings.

To address this, as shown on Table 3, the plan proposes a total of 9,065 dwellings through allocations; 8,080 on “Strategic Allocations” and 985 dwellings on “Local Development sites”. Local Development sites therefore only make up 11% of the total allocated. The delivery of the housing requirement is therefore almost entirely reliant on strategic allocations.

This approach does not align to paragraph 2.3.6 which states; *'The strategy will concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure, and will support the regeneration of the canal corridor through the Stroud valleys and at Berkeley/Sharpness'*. Table 3 clearly is not demonstrating this strategy of housing growth at the main towns, where around half of all of those strategic allocations are not near the main towns of Cam and Dursley, Stonehouse and Stroud.

This is also in conflict with Core Policy CP3 states that "new development should be located in accordance with the District's settlement hierarchy". Providing settlements are appropriately categorised (please see representations in relation to CP3), this is a sound approach. However, the location of strategic settlements and the amount of development allocated to sustainable settlements in Policy CP2, does not follow the policy set out in CP3.

As a comparison, Wiltshire, which is a far larger authority (although with a similar largely rural character) allocated a total of 9,845 dwellings to strategic allocations out of a housing requirement of 42,000 dwellings (23%). Stroud's Strategic Allocations makes up 64%. With this high proportion of Strategic Allocations there is a risk of under-delivery with an overreliance on a handful of sites and a handful of developers. Spreading the requirement across a wider number of sites will make the plan more robust and will mean a more appropriate spread of development across the district.

The over reliance of strategic sites is further exacerbated and emphasised by the fact that of the 8,080 dwellings, almost half of the Strategic Allocations are directed to two new settlements at Sharpness and Wislow.

There are fundamental issues associated with the proposed allocation of the Sharpness new settlement. Not only does its allocation not accord with the stated strategy of concentrating housing growth at the main towns, but the site is also adjacent to Lydney Cliff SSSI and Severn Estuary SAC as identified on Map 3 and adjacent to Flood Zone 3. The proposed allocation is therefore contrary to proposed policy DCP1 (bullet point 6) where it is nearer vulnerable environments and contrary to proposed policies CP5, ES3 and ES4. Sharpness as a strategic location has not been fully justified and reasonable alternatives have not been appropriately considered.

Notwithstanding the above, large scale developments, let alone proposed new settlements such as these will take a considerable period of time before any applications, development or completions take place. The issues highlighted above could potentially delay or limit the amount of anticipated development, and the significant amount of new infrastructure, plus large numbers of different ownerships leading to complex land assembly(as noted in The Strategic Assessment of Land Availability, 2017) can also complicate and delay delivery.

A reasonable delivery assumption in relation the Sharpness site is as follows:

Stage	Date	Note
Adoption of Local Plan	Autumn 2022	
Submission of Outline	Autumn 2023	1 year to prepare outline application
Determination of outline	Spring 2025	18 months for determination
First Reserved Matters	Winter 2025	8 months to prepare RM

Reserved Matters determined and pre-commencement conditions discharged	Winter 2026	
Commencement on site	Summer 2027	

The delivery rate from Sharpness new Settlement is uncertain given that it will be directly competing with both the allocation at Sharpness (300 dwellings) and the proposed new settlement at Wisloe (only circa 4 miles away). However, even if an optimistic rate of 100 dwellings per annum (from 2 outlets) is assumed this would only deliver c 1,300 dwellings, 1100 dwellings short of the allocation.

Indeed delivery from the majority of the strategic sites can be questioned as a result of the proximity of each site and therefore the competition between them. Huntsgrove (750 dwellings) is very close to South of Hardwicke (1,350) and Wisloe, is not only 4 miles from Sharpness, it is also adjacent to sites at Cam (totalling 1,080).

The above highlights the issue with the over reliance from a small number of strategic sites. Core Policy CP2 is therefore unsound as the current approach is not justified and would not be effective in ensuring that the housing requirement is met or effective in ensuring that the Council maintains a five year housing land supply across the plan period.

An effective strategy would be to increase the percentage of dwellings allocated to Local Development Sites. This would not only make delivery more robust across the plan period, it would also ensure the development is more appropriately spread across the district, improving delivery and reducing the risk of reduced delivery rates as a result of competition, and spreading the delivery of affordable housing more appropriately around the district. It is noted that the Council's option 3 Development Strategy (Dispersal) showed a total of 3780 could be delivered via a wider distribution of housing across the district (Local Plan Review: Developing a preferred strategy (revised March 2018)), yet only 985 dwellings have been allocated to Local Development Sites.

As an example, the Wotton Cluster only has 50 dwellings allocated to it. This appears to be as a result of the settlement of Wotton-under-Edge being highly constrained, but ignores the opportunity to locate further development at Kingswood which functions very much in relation to Wotton Under Edge (please see reps to CP3) The Settlement Role and Function studies (2014 and 2018) recognise the sustainability of Wotton-under-Edge and Kingswood and it would appear that if it were not for the AONB around Wotton-under-Edge, the town would be a priority location for expansion – as stated on page 75 of the 2018 Study Update.

One of the main proposed employment allocations is at Renishaw New Mills (10ha of Employment Land) which is closely related to Kingswood. The increase in employment at Renishaw will have significant benefits on the Wotton Cluster which already has a significant amount of employment and has very good access to facilities and services, and this further emphasis that further development within the Wotton Cluster (focused on Kingswood due to constraints at Wotton) would be a sustainable and sound strategy.

Reserve Allocations

The reliance on a high proportion of large, complex strategic sites and challenging delivery rate (as noted at para 2.3.23 of the Pre-submission Draft Plan) could lead to a shortfall in housing delivery over the plan period. In this context reserve sites could provide valuable flexibility and contingency to assist the Council in delivering the housing requirement and should be considered if the ratio of Strategic Allocations is maintained.

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

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

To make Core Policy CP2 sound, the percentage of dwellings to Local Development Sites within/adjacent to accessible, sustainable settlements should be increased. This could be achieved by reducing the numbers of dwellings allocated to the new settlements in the plan period, taking into account realistic delivery rates, or removing one or two strategic sites which are in direct competition with other strategic sites.

Further housing allocations should be directed to the Wotton Cluster as a sustainable location for growth and balancing with the significant employment allocation proposed. With Wotton-under-Edge physically constrained, Kingswood, which is closely related to, and shares much of its facilities with Wotton-under-Edge would be an appropriate location for further housing allocations.

However, if the Inspector is minded to maintain the existing proportion of Strategic Allocations, Reserve Sites should be included to provide flexibility and a contingency to ensure the housing requirement is met and the plan remains effective. Kingswood would be an appropriate location to identify additional reserve sites.

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

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

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

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

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

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

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

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

It will be necessary to participate in the hearing sessions as there are a number of important points to raise which may need to be addressed individually. It may be necessary to respond to any points raised by the Local Authority and we may need to be available to answer any questions on these representations which the Inspector may wish to raise.

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

9. Signature:



Date:21/07/21