

Part B – Please use a separate sheet for each representation

Name or Organisation:

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 checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>

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.

Core Policy 2 (Strategic growth and development locations)

Section 2.5 (Housing) explains how the housing requirement has been identified, based on the Governments Standard Methodology, which equates to a requirement for at least 630 new homes period, which equates to 12,600 homes by 2040.

The proposed development strategy is intended to provide the framework to support the delivery of a least 12,600 new homes and 79 hectares of employment over the plan period. The overarching focus of the development strategy is to concentrate growth at the main towns of Cam and Dursley, Stonehouse and Stroud. Lower levels of growth are directed to smaller towns and larger villages, such as Kingwood, reflecting the range of local facilities and the fact

that they either have good transport links or that there is the potential to improve public transport links.

Alongside existing settlement locations the Local Plan Review is also focused on the creation of two 'new' settlements, at Sharpness (PS36 – up to 2,400 dwellings) and at Winsloe (PS37, up to 1,500 dwellings). In general terms a development strategy which includes a range of sites, both in terms of size and locations is supported as this can provide for greater resilience in the supply of new homes over the plan period.

Strategic sites form a central component of the delivery strategy for the District over the plan period to 2040. A major component of the housing delivery from strategic sites, some 30%, is to be provided by the Sharpness new settlement. Paragraph 72 of the NPPF recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements. As a matter of principle therefore, there is no objection to the identification of new settlement locations as part of the delivery strategy for housing over the plan period.

Section 7 of the Pre-Submission consultation document, 'Delivery and Monitoring', explains that housing delivery at the Sharpness new settlement is not anticipated until 2025, with projected delivery rates equal to 100 dwellings per annum between 2025-2030, increasing to 150 dwellings per annum (2030-2035), and 230 dwellings per annum (2035-2040). Given the fact that delivery is not expected to accelerate until the final part of the plan period, any delays in the commencement of housing delivery at this location will have significant implications for housing delivery towards the end of the plan period where the projected delivery rates are highest, i.e. equal to 230 dwellings per annum.

The proposed new settlement at Sharpness represents an extremely challenging site which is dependent upon major infrastructure improvements and delivery to ensure that development at this location provides future residents with genuine sustainable transport options. Consequently, such challenges raise questions as to the ability of this development location to deliver housing at the scale and pace projected within the Pre-Submission consultation document.

It is therefore essential that the Local Plan has sufficient flexibility built-in to housing delivery to ensure that there is an adequate supply to meet identified needs over the short and medium term, during which time new settlement development areas can progress.

Maximising development opportunities will also support the delivery of affordable housing which is of particular relevance given the identified need over the plan period. Within the Stroud District Housing Land Availability- Residential Commitment in Stroud District at 1st April 2020 explains that over the period 2016-2020 a total of 550 'affordable housing' completions were recorded, which equates to 137 units per annum over the same monitoring period. This compares to an overall unadjusted need, referenced within CP9 of 446 dwellings per annum.

(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.

There should be greater emphasis within the Local Plan to ensure that there is a sufficiently flexible policy framework which maximises development from identified allocations. By way of example this could be achieved through increased densities (where appropriate) and by ensuring that the proposed housing identified for each allocation is not applied as a cap that would otherwise arbitrarily frustrate the achievement of increased scales of development. This is particular relevance where this can be achieved in a manner that is consistent with the wider objectives of the Local Plan and the basis of these allocations as articulated within the respective 'mini visions' and guiding principles, such as land controlled by PHSV at PS24 and PS38.

(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:

Persimmon Homes Severn Valley (PHSV) is a national housebuilder and controls land identified within the Pre-Submission local Plan identified as proposed allocations, these being: 1) Land south of Wickwar Road, Kingswood (**PS38**), and 2) Cam North West (Land west of Draycott), working alongside Robert Hitchins Ltd (**PS24**). PHSV is therefore well placed to contribute to the Examination in terms of the effectiveness of the delivery strategy and to explain how specific allocations, PS24 and PS38, should not be constrained by a quantum of development prescribed in policy as a cap.

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:

A rectangular box containing a solid black rectangle, which is a redaction of a signature.

Date:

21/07/21