

## Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

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="√"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="√"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="√"/>	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 PS37 Wisloe

The Submission Plan proposes new communities at Sharpness and Wisloe, both within the Berkeley Cluster.

The SA prepared by LUC for the Draft Local Plan (May 2021) supports the focus on the Tier 1 settlements for strategic growth (para 4.68):

***“Directing much of the strategic growth to the tier 1 settlements (Cam, Stonehouse and Stroud) is likely to ensure that most new residents will have a good level of access to existing healthcare facilities and areas of open space, as well as education facilities and cultural***

***facilities. Opportunities to walk or cycle to access services and facilities and employment opportunities are also likely to be greater in those areas. In contrast, strategic growth at new settlements (Sharpness and Wisloe) could leave new residents without immediate access to a wide range of existing services and facilities during the early stages of development. The critical mass provided is likely to support the delivery of new services and facilities as well as the delivery of supporting infrastructure through S016/CIL contributions, which will satisfy the needs of residents once the sites are built out.*** ( my emphasis)

The SA alerts the Council to the fact that in the early years at the new settlements, new residents could be left without the access to the wide range of facilities and services and a lack of public transport; in which case these settlements will become reliant upon the private car. Whilst the SA indicates that the critical mass to support the delivery of new facilities and services will be obtained through S106/CIL contributions, the IDP (June 2021) does not provide the list of infrastructure required and the expected delivery programme and cost. It is noted in the conclusions of the IDP that it recommends that the Council should prepare an Infrastructure Funding Statement in accordance with the PPG. (Whilst this document is prepared annually, the most recent is dated December 2020, there is no justification for the policy requirements and consequently this undermines the delivery of the Plan).

In our representations to the consultation on the Draft Plan (Reg 18) in January 2020; Pegasus objected to the proposal for a new garden community at Wisloe, comprising 1,500 dwellings 5 ha employment land, retail, community uses and open space, this area lies between the M5 and the A38, to the south of Cambridge and east of Slimbridge, the A38 provides a barrier to further growth. This scale of development is at the minimum considered in the MHCLG Garden Communities Prospectus (August 2018) i.e. (1,500 – 10,000 homes). Whilst MHCLG indicate that consideration will be given to smaller proposals they need to be:

***“particularly strong in other aspects. For instance, demonstrating exceptional quality or innovations, development on predominantly brownfield sites, being in an area of particularly high housing demand, or ability to expand substantially further in the future.”***

Paragraph 6 of the MHCLG prospectus states that:

***“All proposals must be of sufficient scale to be largely self-sustaining and genuinely mixed use as per paragraphs 13 b and c.”***

We are aware that a bid was submitted to MHCLG in response to the new prospectus for Garden Communities in 2018; Wisloe Green was unsuccessful. There is no reference in any of the promoter material of a house builder(s) involved, this raises questions about the timescale for delivery.

There are principal physical constraints, e.g. the floodplain on the north eastern edge of the area adjacent to Cambridge and the proximity to the M5 to the east. This area has not been considered in the district’s Landscape Sensitivity Assessment (2016). A settlement of 1,500 dwellings cannot be considered as self-sustaining and its future expansion appears to be constrained by the floodplain to the north, the A38 to the west, the M5 to the east and the railway line to the south.

It is noted that the proposed strategic site allocation is not envisaged as an extension to the existing settlement of Slimbridge, indeed it is severed by the A38, and cannot be regarded as an urban extension to Slimbridge. Instead the Plan proposes a new garden community at

Wisloe, as a new distinct Tier 3a settlement. The Plan defines Tier 3a settlements as accessible settlements with local facilities. These medium sized and larger villages are generally well connected and accessible places, which provide a good range of local services and facilities to their communities as set out in Policy CP3.

Our main concerns are not so much the location, but the scale of the proposal and the ability of the site to deliver 1,500 dwellings in the plan period, particularly as there is no developer involved, the site is being promoted by the County Council and the Ernest Cook Trust.

The housing trajectory (Table 6 page 306 of the Pre-Submission Plan) sets out the anticipated delivery for Wisloe and assumes that from the site, 50 dwellings will be completed in the period 2020 – 2050. However, the recent updated research report prepared by Lichfields “Start to Finish” February 2020 concludes that from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered, such sites would make no contribution to completions in the first five years.

On this basis even if an application was submitted in 2021, the site would not start to deliver dwellings until mid – end 2026 at the earliest and if it was assumed to be more towards 8.4 years from the validation of the application, even on this assumption the first houses would not be delivered until end 2029 at best. In which case even based on very optimistic assumptions assuming an application is submitted during the remaining months of 2021, the site would not start to deliver dwellings until 2026, which would result in approximately 107 dwellings being delivered every year in order for the site to be completed in the plan period. In theory the site could just about deliver 1,500 dwellings in the plan period. However, if delivery did not commence until the end of 2029, thus leaving 10 years for the site to be completed in the plan period, this would require 150 dwellings per annum. The Lichfield report states that the average annual build out rate for a site of 2,000 dwellings is 160 dwellings per annum. Furthermore, it is noted that a sustained rate year on year cannot be expected as over a longer period the site will be affected by changes in circumstances and changes in the market etc.

Given the likely housing trajectory is going to differ significantly from what is anticipated in the Plan, the proposal will not be able to achieve carbon neutral development by 2030 as set out in the first paragraph of Policy PS37.

(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.

As demonstrated above, there are significant concerns about the deliverability of the site within the plan period, particularly as no developer is in place. Consequently, this undermines the soundness of the plan, particularly as the Plan is also reliant upon another garden village within the same cluster.

In order to ensure delivery of housing in the plan period additional sites are required to be allocated in the Plan. Thus ensuring development takes place consistent with the strategy rather than at ad hoc locations on appeal.

Land at Grove End Farm, Whitminster which has been promoted to the Council in response to the Reg 18 Draft Plan consultation in January 2020 and in response to the Additional Housing Options consultation in December 2020, as a sustainable alternative to Sharpness or Wisloe should be included in the Plan.

The site's sustainability and deliverability credentials are such that whether or not it is considered as an alternative to Sharpness or Wisloe it should be allocated as an additional growth point to ensure that the Local Plan's housing requirement is met thereby meeting the Government's objective to significantly boost the supply of homes.

As demonstrated in our submissions, it is considered that land at Grove End Farm, Whitminster, which is at the confluence of the A38/M5 and A419 corridors, well related to Stroud/Stonehouse, Cam/Dursley and also Gloucester, provides the opportunity to achieve a mixed use development in a highly sustainable location (being well connected to public transport).

The site is within the control of a highly experienced employment and residential developer/promoter with a proven track record of delivering strategic sites in Stroud and indeed across Gloucestershire. In recent years land West of Stonehouse has been brought forward through the adopted Stroud Local Plan.

(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:

Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

**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:

