

## 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.

### **Section 2.4 Our Towns and Villages**

Pegasus object to the strategy, it is considered that by proposing a new settlement at Sharpness this does not prioritise growth at sustainable locations. (para 2.4.1)

As set out in our representations to PS36 Sharpness, the location is not within the key movement corridors identified in the Stroud Sustainable Transport Strategy (February 2021) prepared by AECOM, and it is not considered to be deliverable in the plan period.

Whilst para 72 of the NPPF supports in principle the role of new settlements and significant extensions to existing villages and towns as a means of delivering a large number of dwellings, the

key point is that new settlements need to be well located and designed and supported by the necessary infrastructure and facilities (my emphasis).

The evidence provided to date does not support the location of a new settlement at Sharpness. There is no detailed housing trajectory, programme for delivery of the new settlement including all the other land uses, there are no details of infrastructure funding. The only housing trajectory (and this is for strategic sites only) appears to be “hidden” in the Viability Evidence prepared by HDH May 2021 (page 135)

Year ended	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043
PS24 West of Draycott				50	150	150	150	150	150	100														
PS25 East of River Cam										50	50	50	30											
G1 South of Hardwicke							120	120	120	120	120	120	120	120	120	120	120	30						
PS30 Hunts Grove Extension				8	68	90	110	110	110	110	110	34												
PS34 Sharpness Docks				45	35	30	20	20	20	26	26	26	26	26										
PS36 New settlement at Sharpness								50	150	150	150	150	150	150	150	150	150	250	250	250	250			
PS19a Northwest of Stonehouse					50	50	75	75	75	75	75	75	75	75										
PS37 New settlement at Wisloe						50	75	100	125	130	135	135	135	130	130	130	125	100						
G2 Land at Whaddon							50	75	100	150	200	200	200	200	200	200	200	200	200	200	200	200	200	25
## Grove End Farm						75	100	150	150	150	150	150	150	150	150	150	150	150	150	150	125			

Table 7.4 Development Trajectories

Pegasus object to the optimistic delivery assumed in the Plan which is inconsistent with national research on schemes of this size prepared by Lichfields. The research found that from the date at which an outline application is validated for a scheme of 2,000 dwellings plus, the average time for the first home to be delivered is 8.4 years; such sites would make no contribution to completions in the first five years. As no application has been submitted for the new settlement at Sharpness, it is considered that this site will not start to deliver until 2029 at the earliest, consequently pushing the delivery back. This point is covered in more detail in our representations to Policy PS36 Sharpness.

Paragraph 7.72 states that: ***“The promoter of a large Strategic Site (Lioncourt Strategic Land, for Sharpness Development LLP) suggested that the peak output of 200 units per year (across multiple outlets) would be reached in less than the 6 years. This may be the case, however it is appropriate to take a cautious approach in a high level assessment of this type.”***

Again this is inconsistent with the research undertaken by Lichfields which found that the average annual build out rate for a scheme of 2,000 dwellings was 160 dwellings per annum. The research found that 61 dwellings per outlet on sites with one outlet, reducing to 51 dwellings for sites of two outlets, and 45 for sites with three outlets.

Whilst it is recognised in the PPG Plan Making Paragraph: 059 Reference ID: 61-059-20190315 when plans are looking to plan for longer term growth through new settlements ***“that there may not be certainty and/or the funding secured for necessary strategic infrastructure at the time the plan is produced. In these circumstances strategic policy-making authorities will be expected to demonstrate that there is a reasonable prospect that the proposals can be developed within the timescales envisaged.”*** (my emphasis) However, there is a lack of evidence to support the proposals that can be delivered especially when delivery is expected, according to Table 6 of the Local Plan, within the next 4 years (and as illustrated above in the table taken from the Viability evidence).

The PPG Plan Making Paragraph: 060 Reference ID: 61-060-20190315

***“Strategic policy-making authorities will need to demonstrate they have engaged with infrastructure providers, ensuring that they are aware of the nature and scale of such the proposals, and work collaboratively to ensure that the infrastructure requirements are not beyond what could reasonably be considered to be achievable within the planned timescales.”***

However, once again no evidence has been provided e.g. the STS refers to the sustainability measures required, but there is no hard evidence to demonstrate delivery. The STS at page 30 refers *“to the applicant has advised that the re-opening of the Sharpness railway branchline for passenger services is feasible and can deliver an attractive train service to Gloucester. In advance of this, or if this is not feasible, express bus/coach services to Bristol and Gloucester will be needed to fulfil this demand.”*

Pegasus object to the inclusion so Sharpness as a new settlement to meet the needs of Stroud district.

Due to the level of environmental designations and constraints in and around the proposed development area, which will require extensive mitigation, this will have a significant impact on viability and hence deliverability of the proposal. In turn this may also impact on the ability of this proposed development to deliver other policy requirements of the plan.

It is considered that the proposed new garden village at Sharpness will not achieve the above and deliver the number of dwellings anticipated in the plan period.

As set out in our previous representations to the emerging Strategy and the Draft Plan, Pegasus object to further development over and above the current local plan allocations at Sharpness. It is considered that irrespective of whether a new community at Sharpness is viable, its delivery is going to be inferior to sites better located to centres of population. Consequently reliance on this site places a high risk on delivery.

(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.

The new settlement at Sharpness should not form part of the strategy, the allocation should be deleted and a the sustainable alternative development at Grove End Farm, Whitminster should be included. This is covered in more detail in our objections to PS36 Sharpness.

(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:

