

**STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW
EXAMINATION IN PUBLIC (EiP)**

MATTER 5 | NEW SETTLEMENT AT SHARPNESS

FEBRUARY 2023

Grass Roots Planning on behalf of Redrow Homes Ltd

Contact: Matthew Kendrick

Email: matthew@grassroots-planning.co.uk

grassroots
PLANNING

grassroots PLANNING

Bristol North Baths
Gloucester Road
Bristol
BS7 8BN

t: 0117 930 0413 w: grassroots-planning.co.uk

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1.0 LAND AT SHARPNESS – POLICY PS36

Issue 5 – Are the proposed new settlement allocations at Sharpness and Wisloe justified, effective and consistent with national policy?

1.1 The above heading is the main question that must be answered in relation to the Sharpness New Settlement (SNS).

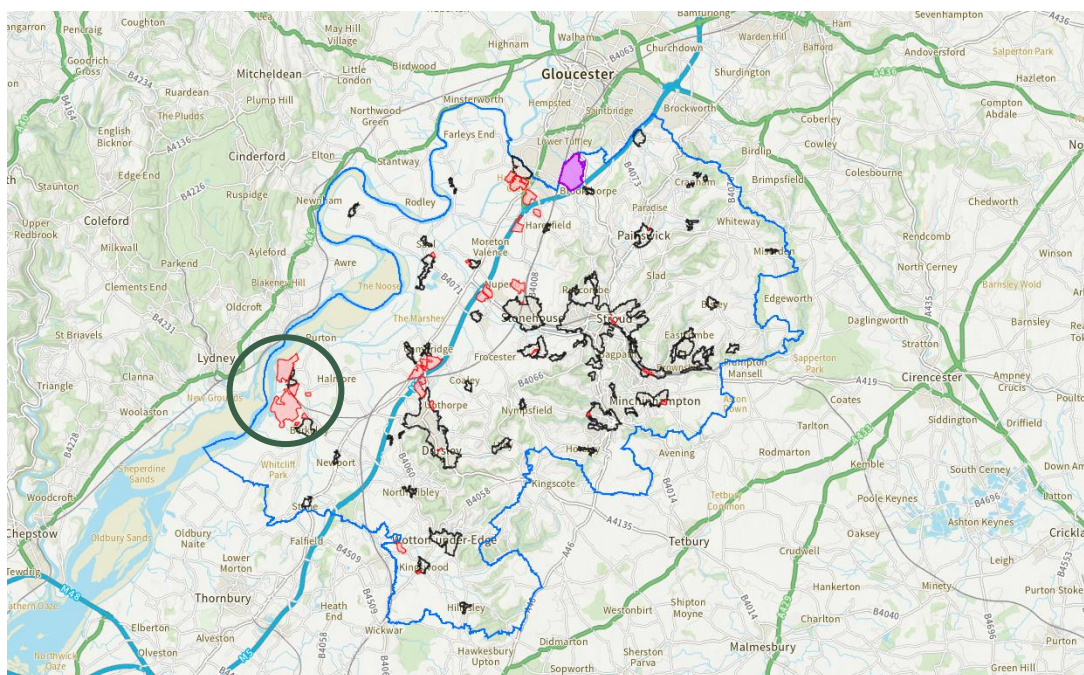


Figure 1. Sharpness' Location Relative to the Rest of the District

1.2 Sharpness is a very peripheral location in the District (being a current small settlement of just 1,234 residents according to the 2021 census), spread across a cluster of what could be termed hamlets. There is little in the way of a settlement core on which to focus a new settlement and harness existing services and facilities to serve early phases of development. This is a significant issue because it means that even early phases of development here will need infrastructure delivery from day one, because existing schools, shops, and other services simply do not exist to accommodate the first phases.

1.3 Sharpness is repeatedly referred to in ten Council's own evidence base as being 'remote' (for example see EB80).

1. Does the proposed allocation meet the vision, spatial strategy and strategic objectives set out in the Plan? Does the policy ensure that these objectives will be met?

1.4 Fundamental to this question is Sharpness’s locational sustainability, and whether it has been evidenced that a large-scale development here can be made sustainable. Key to achieving the Council’s vision to be ‘carbon neutral by 2030’ will be ensuring that development is located in places where the ability to minimise private car travel is maximised. As we have set out in our previous representations, the proposed allocation at Sharpness does not achieve this for the following reasons:

- As a location it has no existing services, facilities or employment opportunities that would sustain the sale of development proposed here. It therefore will need to deliver all of this supporting infrastructure and attract employers to the site to make any residential development here sustainable. As we will explain later there is no site specific viability report that shows how the development will be funded, and in particular how the supporting infrastructure – which will need to be delivered up front if the development is to be sustainable – can be ‘pump prime’ funded in advance of any significant revenue being accrued from residential land sales;
- The public transport solutions proposed for the site are not suitable, with the bus service offer being focused on ‘on-demand’ services (a modern version of ring and ride) which is a service that has no precedent or pedigree in relation to being delivered in a rural area such as this – with the case studies being presented in London, Gothenburg, Helsinki and Birmingham. These are incomparable with the Sharpness site, as in those cities there will be much higher critical mass of users and more geographically concentrated existing services and facilities that people want to travel to; and
- National bus operators, who also operate extensively in the region, see no business case for the public transport linkages that have been put forward by the promoters.

1.5 These concerns are also shared by other consultees, including Stagecoach buses who have articulately set out why delivering sustainable public transport services to a new community at Sharpness is not possible. This is a fundamental flaw in the whole scheme – without everyday services and sufficient numbers of jobs to sustain a community of the size envisaged, the pressure to travel to other employment and service hubs in the area via car will be great. Even with such service, it is also naive of the council to think that all residents would behave in a way that means trips are self-contained (i.e. all residents live and work in Sharpness) – therefore viable public transport links from the new settlement are essential.

1.6 If a range of consultees, including the providers of public transport services, are saying there is no costed plan to deliver public transport links to ensure that new residents have the credible alternative of using sustainable forms of transport then it is inconceivable to see how the allocation can be considered to be justified, when considered against the alternatives of allocating land that is more appropriately located where sustainable access can be provided.

Nor will it be considered effective in ensuring the delivery of the vision to 2040, and it will not be consistent with national policy set out in the Framework in respect of the need to promote a sustainable pattern of development (para 11(a)), assist in meeting the environmental objective of sustainable development (para 8) and make sure opportunities to promote walking, cycling and public transport are pursued (para 104 (c)).

- 1.7 We have significant concerns regarding the proposed spatial strategy for Stroud in that the LPR relies heavily on large strategic sites to deliver the housing growth that is required to meet housing needs that are predominately generated by the existing population – 19% of the total supply being proposed in Sharpness alone, a cursory glance a map of the district (such as that shown in figure 1) shows how peripheral and divorced from the bulk of the existing population that this site is, it is therefore difficult to see how the housing needs of existing communities will be appropriately met.

2. Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities?

- 1.8 There is no available evidence to show that the Sharpness proposals will be a sustainable garden community. We are dealing with two other garden communities in the South West and these proposals are supported by detailed information as to how the essential community hub, services, shops, schools and other supporting infrastructure are to be phased as the development progresses and most importantly viability work to demonstrate how the delivery of such essential supporting infrastructure is viable in their early phases, while also delivering policy compliant levels of affordable housing.
- 1.9 One specific conflict between the Garden City Ethos and what is proposed at Sharpness is the example of transportation documents referring to households needing to pay a management fee towards the costs of public transport – this does not support the Garden Village principles of ‘*land capture value for the whole community*’.
- 1.10 One of the Garden City principles is also aimed at creating an accessible development, stating:

Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

- 1.11 The major barrier to achieving this is the remote nature of Sharpness. If extensive core facilities cannot be provided within the new settlement at inception then walking and cycling

to the larger population and employment centres in the District is simply unfeasible given the distances involved.

3. Is the policy aim, of providing a new self-contained garden community settlement, viable and realistic? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period?

- 1.12 Garden Settlements require a huge upfront investment in infrastructure to make them sustainable - for example Welborne Garden Village near Fareham in Hampshire is a recent scheme which has costed supporting infrastructure at £308m (based on 6,000 homes), clearly setting out that even where the site lies within walking distance of existing facilities, services and employment, upfront infrastructure costs equate to £51k per dwelling.
- 1.13 EB111 sets out SDC's assumptions about per plot infrastructure costs which are considerably lower (£19,611 S106 and £6,802 CIL per dwelling) than this comparable, which have also reduced over time – something we have raised concerns about as it is very difficult to discern how the S106 costs have been arrived at. Clarity should be sought as to whether these reflect the increased education and highways costs we refer to at paras 1.17 and 1.35 of this statement.
- 1.14 The other Garden Villages that have progressed (referred to below) have attracted substantial government investment (the Welborne example has £50m of public money committed to it) and support from companies that have fully costed the need to invest in the project upfront. There is no evidence of this being in place for the SNS.
- 1.15 Sharpness offers little or no facilities to support the scale and nature of development proposed as part of policy PS36, which is in addition to the development also proposed as part of PS34 at Sharpness Docks.
- 1.16 For example the nearest secondary school is Rednock Secondary School in Dursley/Cam which is circa 8 miles distant, and nearly a 20 minute drive away. Therefore, a new secondary will be required to support the development, and if this isn't delivered at a very early stage in the development transport patterns associated with educational trips are likely to be unsustainable.
- 1.17 The Council's IDP sets out that the new garden community would be expected to contribute £6.3m to primary and £8.2m to Secondary education. However, these figures are not up to date in our view.

- 1.18 GCC's recent response to the nearby planning application for the 300 dwellings on the northern edge of Sharpness Docks (S.17/0798/OUT), which for ease of reference we have set out at appendix A to this statement, requests a total contribution towards education that equates to £12,449.45 per dwelling. Based on the the 2,400 dwellings that the LPR will deliver in the first phase of the SNS a contribution of £29.9m would be needed towards education – a £15.4m difference to the IDP figures. Therefore, we would urgently request that the anticipated S106 contributions that the IDP sets out be confirmed as being accurate at the time of the Hearing Session.
- 1.19 Much emphasis is placed on ensuring that walking and cycling links to Berkeley are provided (see criterion 16 of policy PS26), however Berkeley offers little in the way of employment opportunities, large scale retail or other services beyond that expected in a small district centre. Furthermore, the distances involved between Sharpness and Berkeley (over 2.7km) mean that it is highly unlikely that residents would travel by sustainable means, and will be left with no option other than the private car in advance of the development of a new community hub, with the shops it would potentially provide, being delivered as part of a new settlement. This underlines the paucity of options available to future residents that links to such a small service centre are a focus of this policy.
- 1.20 Garden Settlements are notoriously hard to make viable and often they are proposed in locations where they leverage synergy with nearby communities – for example Cranbrook lies near to Exeter and residents benefit from easy access into that city for employment, shopping and other facilities and the short distance between the settlements means even cycling is a sustainable travel option. The location of Cranbrook relative to Exeter is shown in figure 2 below.



Figure 2. Cranbrook Relative to Exeter

1.21 Similar characteristics apply to proposals presented by Grass Roots Planning for the Selwood Garden Community at Frome, Mendip, which currently subject to a planning application for 1700 dwellings, employment land, new primary school and community hub. This site is located where, while a new complementary settlement can be provided, linkages via both walking and cycling to existing facilities reduce the infrastructure burden associated with the development and also allows early phases to be delivered within the full delivery of all the infrastructure that the scheme will deliver upfront, which would, be unviable.

1.22 For information and comparison the location of the Selwood Garden Community project is shown in Figure 3 below.



Figure 3. Extent of the Selwood Garden Community project in Frome, Mendip

1.23 Cranbrook is also a good comparable in respect to the consideration of the viability of rail services. Here 3,400 dwellings were required to deliver the new station, with over 8,000 needed to make it viable in the long term.

1.24 These are not isolated examples of where a Garden Community is located very close to an existing settlement of significant size, as the following list of GVs that have attracted public investment attests to:

- West Carclaze, Cornwall – lies adjacent to the northern fringe of St Austell;
- Culm Garden Village, Mid Devon – Cullompton lies adjacent within walking distance;

- Long Marston, Stratford-Upon-Avon – lies within walking distance of an existing large sale employment area and secondary school, on main bus route to SUA which lies just 4 miles away;
- Oxfordshire Garden Village, West Oxfordshire – essentially an extension to Enysham, which provides a range of schools, shops and other facilities to support initial phases of development, larger settlement of Witney lies just 4.5km to the west and Oxford 3.5km to the east with existing bus services to each;
- Deenethorpe, East Northants – just 2km from Corby;
- Welborne, Hampshire – this new settlement lies directly adjacent to Fareham;
- Dunton Hills, Essex – lies adjacent to Basildon;
- Spitalgate Heath, South Kesteven – lies directly adjacent to the large settlement of Grantham;
- Halsnea, Knowsley – essentially forms an urban extension to Whiston and Huyton in Liverpool;
- Longcross, Runnymede and Surrey Heath – this is one of the more peripheral locations but still lies adjacent to a large employment area, Longcross Studios, on an established bus route and just 4km from Chertsey;
- Bailrigg, Lancaster – effectively an urban extension to Lancaster and also lies adjacent to Lancaster University campus and a Health Innovation Business park;
- Infinity Garden Village, South Derbyshire and Derby City area – effectively an urban extension to Derby, recently received £70m of levelling up funding to assist delivery;
- St Cuthberts, Carlisle City – a southern extension to the urban area of Carlisle; and
- Handforth Garden Village, Cheshire East – located directly adjacent to and within walking distance of Handforth which is a suburb of Stockport.

1.25 On the contrary, it is hard to find any examples of a successful Garden Community being delivered in an isolated location such as Sharpness, where all its infrastructure needs to be delivered from scratch and an adjacent settlement does not provide some of its supporting facilities. Furthermore, all of the above examples required public investment to facilitate their delivery even in these locations where there were existing communities and proven market demand. Sharpness has no committed public investment to our knowledge.

1.26 If the Council or promoters have such examples, we would be happy to discuss them as part of the hearing session, in their absence the policy is not sound as it is not justified.

4a. Does the policy clearly identify what infrastructure is necessary to support the delivery of the allocation? Will it be delivered at the right time and in the right place? How will this be achieved?

- 1.27 Policy PS36 makes some reference to supporting infrastructure.
- 1.28 The delivery of a community centre to include medical facilities, shops and other services to meet everyday needs will be essential given the paucity of existing facilities at Sharpness.
- 1.29 In respect to schools the policy is far from clear – it seems to be requiring that the development deliver a primary school, but just contributions are required to a secondary school. We would question why both schools are not directly delivered by a development of this scale and given that the closest secondary school is some considerable distance away. There is also no reference to the trigger points by which time these schools are needed; the LPA and County Council must be able to assess the capacity of the nearby primary school to clearly establish these triggers now.
- 1.30 Similarly, the requirement for mitigation for the Severn Estuary SAC/SPA impacts requires an appropriate trigger to be agreed, which is likely to be early in the development adding further costs to initial delivery.
- 1.31 There is no reference to what specific off-site highways mitigation will be required in connection with the new settlement, which is presumably why the Inspectors have raised question 4b.

4b. Has the impact of the new settlement on the surrounding road network, including nearby motorway junctions, been adequately assessed? Can any impacts be mitigated and if so, how and when? Is this feasible? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14.

- 1.32 There are well documented constraints that affect this junction and any large-scale development will exacerbate these issues. However, conversely, they also hold the key to the solution through a holistic approach to funding the junction improvements.
- 1.33 Therefore, the Council should be working with both GCC and National Highways (NH) to agree how all development that will affect this junction will contribute towards phased improvement works that can unlock the issues in a well-planned way. The AECOM report (EB109) has costed these works and apportioned these to the various local plan proposals, so a firm basis for this is established.
- 1.34 A new policy that requires development within a defined geographical area, which are of a scale that will materially affect the junction, to contribute towards holistic improvements.

1.35 Table 9.11 of EB95b clearly shows site traffic flows arising from SNS that would affect Junction 14, a 8-14% increase. The promoter’s consultants consider these to be small scale – we do not agree, because the cumulative effect of SNS combined with the rest of the proposed plan growth needs to be considered. EB109 also suggests that Sharpness should contribute 24% of the required funding towards the J14 improvements, supporting our assertion that their impact is not insignificant.

1.36 The costs apportioned in EB109 to the SNS are as follows:

	Total Scheme Costs Attributed to Stroud Sites	% Attributed to SNS	Total Contribution for SNS
M5 J14	£5,449,367	34%	£1,852,784.92
A38	£2,287,500	47%	£1,075,125
Total			£2,927,909.92*

*Note this is different from the AECOM figure by £48K, seems to be a rounding error

1.37 Again, this adds to our concerns about this project’s viability because these works will be required to mitigate the impact of the development at an early stage, for example the J14 improvements cannot be phased in any significant way.

4c. The policy refers to a new railway station being delivered on the Sharpness branch line as part of the development.

i. What is the status of this project and is the delivery of the site allocation dependent on this coming forward?

1.38 It is our view that the delivery of a rail link is essential if there is any chance that such a peripheral location can be considered an appropriate and sustainable location for such a considerable amount of new development. It is obvious from the submitted information that any bid for funding is at the very earliest stages where monies for the feasibility work are yet to be secured and we note that EB95i sets out at 3.1 that more work is to be undertaken and that many matters are the responsibility of Stroud DC. We are not aware of any detailed engagement or support for the allocation being obtained from Network Rail, which is a significant concern and failing.

1.39 It needs to be noted that the reinstatement of railway lines is well documented as being difficult and expensive. The Portishead to Bristol reinstatement, which would be serving a large existing population, has taken decades and is still yet to be delivered.

1.40 A more recent comparable site/location is Charfield in South Gloucestershire, with the settlement being the subject of a number of large sites being won at appeal, and an emerging

large-scale allocation in the Joint Spatial Plan (now defunct). As part of this it has been a longstanding requirement to reopen an existing station at Charfield, which sits on the Birmingham to Bristol mainline – an operational passenger service, unlike Sharpness that has no such existing service where much more extensive upgrades are required.

1.41 In this case the following timeline applied:

- December 2020 – strategic outline business case approved
- July 2021 – Network Rail preliminary design completed
- September 2021 – outline business case submitted
- October 2021 to January 2022 – pre-application public consultation period
- December 2021 – outline business case approved and funding agreed for next phase
- September 2022 – planning application submitted (delayed until October and remains unresolved)
- 2023/24 – Work to commence
- 2026 – the current planning application suggests the station will be operational

1.42 It is clear from the above that from the point of a business case being submitted it will take a minimum of 5 years to get a station opened, and in the case of Sharpness the funding for the business case is still awaiting approval and we would estimate its submission is two years away. Therefore, even if proven viable, a working train station offering just hourly services at best, is some 7+ years away.

1.43 Even the council's own IDP (page 29) cites major concerns:

'Concerns were raised in the Gloucestershire Rail Investment Strategy that whilst the reopening of the line could provide sustainable transport to Sharpness and enable significant growth in the area, analysis shows a very limited GVA impact for a very costly new piece of infrastructure. This was also reflected in the comments from Network Rail and GCC Highways'.

1.44 Given the highly unsustainable location of Sharpness, the train station is key to any proposal here failing to be sound on the basis of offering an alternative to the private car, and minimising carbon emissions. There has been no evidence to suggest that the train station will come forward in a timely manner and it is our view that no sizeable development should occur at Sharpness without this. It therefore makes the whole proposal highly uncertain and without any firm and credible foundation.

ii. What level and frequency of rail service is proposed and is this supported by Network Rail and relevant service providers?

- 1.45 We note that an hourly service is proposed, potentially moving to every 30 minutes if successful, but no detail as to the exact service is proposed and the promoter's own submission indicates constraints at Gloucester Station that are yet to be resolved to deliver the service.
- 1.46 The LPR evidence base contains no submission or agreement from National Rail or service provided in respect of the proposed rail link. This is extremely concerning given the critical nature of this potential infrastructure upgrade., without which there is little hope of delivering a sustainable development here.

iii. Has funding been identified to support the delivery of this scheme?

- 1.47 In respect of this point, it needs to be noted that the redaction of costing figures from EB95i is not appropriate as it allows for no transparency. Viability assessments with much more detailed and commercially sensitive information must now be made public and we cannot see how in that context financial figures can, or should, be redacted from a Local Plan evidence base. There is also no reference to the rail infrastructure costs being included in the infrastructure cost figures presented in EB111, can the council clarify this?
- 1.48 One of the few sections that has not been redacted is on page 4.48 of the business case. This identifies the need for the service to be subsidised at £1m in year 4 declining to £206,000 by year 19. This represents an enormous sum of money over nearly 20 years, which will need to be sourced from developers or the public purse – there is currently no detail on how that will be funded.
- 1.49 Capital costs aside, we see no presented evidence to suggest that sufficient funding to meet even the ongoing subsidy that is required to make the train service viable, there is therefore no certainty it can be delivered.
- 1.50 Given previous conclusions reached by GCC and Network Rail regarding the value for money this scheme would deliver (see para 1.40) obtaining such subsidy seems a remote possibility.

iv. What are the proposed timescales for its delivery and would it be in time to support the new settlement?

- 1.51 Page 3.21 of the promoter's outline business case suggests that a new station will not be opened, and even then only on a limited hourly, weekday only, until the completion of 1,000-1,200 houses (a trigger point at least 7- 8 years into the build programme we would estimate). This is woefully insufficient to ensure that new residents get the opportunity to utilise sustainable transport options and develop good habits in this regard.

4d. Is the proposed new rail link (on the Bristol-Birmingham mainline) and express coach services deliverable and viable and have funding sources been identified for these schemes? What is the timetable for delivery for these projects and will they be delivered in time to support the allocation? The policy refers to the coach link being required at an early stage in the development, is this viable? Have discussions taken place with the relevant infrastructure providers taken place (such as Network Rail) and do they support the projects? Has funding been identified? Has capacity been identified on the Bristol-Birmingham mainline to accommodate additional passenger traffic?

- 1.52 We note the strong and compelling Stagecoach representations in respect of the viability of bus services in general serving the SNS; this also applies to the express service and we defer to them as experts on this matter. The promoter's own documentation refers to a service every 15 minutes in order to make this SNS accessible, and we consider such a regular service will be extremely difficult to deliver without significant amounts of subsidy.
- 1.53 EB95i cites the considerable constraints associated with Gloucester Station and there is no firm plan to solve these, without funds to guarantee the delivery of the station improvements the aspiration of the new regular rail link is unproven.

4e. The Sustainable Transport Strategy (STS) lists a number of interventions for the site that will need to be incorporated into its design and layout and be delivered at an early stage. For instance, it identifies that sustainable transport movements should be prioritised over vehicle movements by providing high-quality and accessible cycling and walking routes, which connect to Quedgeley West Business Park and local community facilities on Green Lane. Are these requirements and the timing of their delivery sufficiently clear from the wording of the policy? Will sufficient suitable and available sustainable transport links connect the site with the surrounding area?

- 1.54 There is currently no clarity in respect to the timing of these improvements within the policy. Without this we cannot comment in much detail other than to say such links would have to be delivered at a very early stage to offer any realistic means of sustainable non-vehicular transport (putting aside the large distances involved). In a recent application we dealt with in Dorset, which delivered bridleway improvements via S106, the cost per linear metre was £65,

any early phase would have to create many 1000s of metres of surfaced cycleways to provide sustainable links as a minimum – 10,000 linear metres would cost £650,000 even without considering any bridges, culverts etc. that would add to this basic cost. This will add further to the cost of infrastructure to serve even the early phases of any development here.

8. The policy refers to the development having ultrafast broadband to homes and businesses with top average speeds of 1Gbps. As this requirement would be delivered by a third party (Open Reach) and would be outside the control of the developers, is it justified and effective?

- 1.55 As we have set out most residents who would potentially occupy the site are likely to travel a significant distance to their places of work. One way of minimising the impacts associated with this would be to prioritise homeworking and these broadband improvements would be central to meeting that aim. Therefore, simply relying on the goodwill of the provider is not robust and sound, a binding commitment would be needed that requires that any developer ensures that these improvements are delivered to a set time frame, and part fund these if necessary. This will add further to the financial burden of delivering the scheme.

11. Has full consideration been given to the impact of the proposal on other factors including the loss of agricultural land and local landscape and is this clearly set out in the evidence base supporting the Plan?

- 1.56 We are unable to find any ALC assessment in the evidence base, the MAFF provisional maps for the area indicate the land around Sharpness is Grade 3, but it cannot be determined if this is Grade 3a which is BMV or not. This needs to be clarified to see if the allocation of this site conflicts with paragraph 175 of the Framework.

14. How will phasing be used to ensure that employment land and local services and facilities, such as schools, are developed and completed in parallel with housing land completions?

- 1.57 As we have set out, there will be significant amounts of money required to deliver infrastructure at the earliest phases of development. Page 71 EB95i sets out the land value uplift that could accrue from the development, which could presumably pay for the substantial additional infrastructure that the new Garden Community will require. However, there is no clarity on whether that uplift allows for the ‘normal’ S106 contributions such as the education contributions we have identified earlier – as we set out these are substantially higher than the IDP anticipates, so we would request clarity from the promoters on what S106 contributions were assumed to generate these land uplift values and how they

have changed since the time they were generated in June 2021, to take into account construction cost inflation and changed sales revenues associated with the current economic outlook.

- 1.58 The biggest concern regarding the allocation of employment land at Sharpness to support the Garden Village, is whether it is commercially attractive and deliverable. The allocation of employment land at Sharpness stretches back to before 2005, with the allocation first set out in the 2005 Local Plan, and again in the November 2015 Local Plan, where paragraph 3.59 states:

‘Whilst Sharpness Docks is a thriving and busy port, the former employment allocations have not been taken up as envisaged in the 2005 Local Plan and accessibility remains an issue.’

- 1.59 The new rail station will not materially improve accessibility in regard to employment for delivery, HGVs etc., because freight services already exist. And bus service provision, if viable, would not significantly either. The inaccessibility of the location for employment will remain an issue and past history suggests its delivery will be commercially problematic. Without employment land delivering jobs here, the garden community becomes completely unsustainable.

20. Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?

- 1.60 We are currently unclear as to whether the two promoters of the site control all of the land that is required to deliver the allocation, it is Redrow’s understanding that they do not. We would appreciate clarity from them on this point. If they do not control all the land then delivery is very uncertain.
- 1.61 Setting aside this and the infrastructure barriers we have identified separately, the Council’s anticipated delivery on the site is unrealistic, with 500 expected 2025-30. A start on the site by 2025 is extremely optimistic.
- 1.62 Assessments such as the Lichfield’s ‘Start to Finish’ report identifies the considerable time it takes from an outline planning permission (which given the site’s scale must be considered the first step for the SNS) to first completions – with this analysis identifying it takes 5.0-8.4 years from the outline application being validated to the first home completions. An outline application for the site is yet some way off, so in our view it will be at least six years before any housing is delivered on the site, and that is based on an optimistic view that an outline

application will be validated within 1 year from now and the application determined and S106 signed very quickly compared to Lichfield case studies.

- 1.63 The council also assume 230 dwellings per year will be delivered on the site during the 2035-40 period. This conflicts with the promoter’s own assumptions of 180 per annum set out at page 71 of EB95i, which are in our view more realistic and still would require at least three separate housebuilders operating on the site at any one time to achieve – which in itself will require all supporting infrastructure such as schools, shops, community hub facilities etc. to be in place. The promoters have also assumed a more realistic step change in delivery as the site starts up within EB95i. If their own assumptions and a realistic, but still optimistic, minimum start date of 6 years is assumed, the trajectory should shift as follows:

2020-25	2025-30	2030-35	2035-40
0	30 dwellings	630 dwellings	900 dwellings

- 1.64 This means that SNS will deliver 1,560 dwellings over the plan period, not 2,400, and even if this allocation were to be accepted as sound, alternative sites to accommodate the shortfall of 840 homes (which is a conservative estimate) will need to be found.



grassroots PLANNING

Grass Roots Planning Ltd
Suites 9 & 10
Bristol North Baths
Gloucester Road
Bristol
BS7 8BN

t: 0117 930 0413 grassroots-planning.co.uk