

STROUD DISTRICT LOCAL PLAN EiP

Submission on behalf of SevenHomes

Matter 5 Sharpness and Wisloe Allocations



1. The purpose of this Paper is to set out SevenHomes's position in respect of Matter 5. By way of context, SevenHomes is not directly opposed to the delivery of the allocations but is extremely concerned that the approach of the Plan is unsound.

Question 1

2. On the face of it, the proposed allocation of the site would achieve the Vision, Strategic Objectives and Spatial Strategy of the Plan. However, this would only be achieved if the allocation was delivered in totality as set out in Policy PS36. Any deviation or removal of these objectives from PS36 would represent a significant departure from these key parts of the Local Plan.
3. The Local Plan has decided to allocate a substantial green field site with a complex series of policy requirements relating to the provision of open space, masterplanning, biodiversity net gain and providing sustainable transport choices, moving away from the need to travel by the private car. This allocation is provided in a relatively remote, southwestern part of the District, where there is not the current level of infrastructure or service provision. There has to be a balance struck between the aspirational part of Plan making (as per paragraph 16 of the NPPF) but be a Plan which is equally deliverable.
4. From a Plan making standpoint, there is requirement for proportionate evidence to be provided to support the Plan and, given the central role this allocation plays in the Plan, the evidence required to support it has to be equally proportionate. In the case of the evidence provided (explored in more detail in relation to Question 4) that evidence is not there at this point. Therefore, it cannot be guaranteed that the allocation would meet the matters identified in this question.
5. The implications of this potential failure to comply are significant. PS36 the largest allocation in the Plan, proposing 2,400 dwellings during the current plan period, rising to 5,000 dwellings by 2050. This is the key allocation in the Local Plan, against which decisions about the distribution of development elsewhere across the District have been made, any failure of this allocation requires the Plan to revisit the strategy as a whole.

Question 3

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6. SevenHomes's position is that the aim of the PS36 allocation is to create a new community at Sharpness, designed along garden village principles. It is clear from the policy that there are a considerable number of design objectives looking to discourage the use of the private car and promote sustainable transport choices within the new community being created. However, in terms of the matter of self-containment, this is not a specified objective of the allocation as such an objective is conspicuous by its absence in the allocation policy. At best, it can be expected that the mix of housing, community facilities, retail and employment opportunities look to promote better levels of self-containment, commensurate with the Plan's approach to employment distribution at paragraph 2.6.9.
7. It is equally clear in the evidence base supporting the allocation that there is not an expectation of self-containment. Table 39 on page 8.75 of the Transport Technical Appraisal notes that the total demand for the proposed Sharpness Rail Station would be in the region of 22,500 passenger per week resulting in potentially 1 million passenger journeys each year to locations outside of the District (Gloucester, Cheltenham, Tewkesbury, Bristol, and the wider South Gloucestershire). In terms of bus journeys, the same study notes that it is difficult to predict and needs to be considered at the time (paragraph 9.5) as much depends on the success of the rail transport package.
8. In all however, the evidence supporting the allocation does not point to a self-contained settlement in its own right. At best, it points to a new settlement, where if the full spectrum of transport infrastructure is provided, as per Policy PS36 then future residents will have some viable alternatives to using the private car, but still need to travel outside of Sharpness and outside of the District.

Question 4C

9. At this stage, whilst some of the initial technical work has been undertaken and documented by the Council regarding the provision of a new railway station at Sharpness there is no evidence demonstrating that this is going to be delivered and that further technical work and funding has to be secured. Given the fact that this is a centrepiece of the allocation, the failure to deliver this would have significant implications to the Plan's overall development strategy.



Question 20

10. SevenHomes is concerned that the housing trajectory for the site, as detailed in Table 6 of the Plan is simply unrealistic. Table 6 of the Plan (p306) assumes that the site will be delivering 500 dwellings in the period 2025 to 2030. This is unrealistic for the following reasons:

- Once adopted, outline application is submitted with E.I.A. Outline Planning Permission follows with a S106 Agreement. Currently there is no information available to the EIP (pending a Statement of Common Ground being issued) showing what the timetable would be for the submission of the application and the timetabling of its determination.
- Assuming that an application was submitted by the start of 2024, it is unlikely that the Council would be in a position to determine it positively until early 2025 at the latest, given the need to secure identifiable outcomes on key infrastructure.
- In terms of delivery, publicly available research from Lichfields, concludes that sites more than 2,000 dwellings take six to seven years to deliver. This means that it will not deliver first dwellings until 2030/2021 at the earliest.
- Matters could be further delayed by infrastructure requirements and the need/time taken to sell parts of the site to third party developers and to deliver subsequent reserve matters applications.
- Even if delivery commenced in 2029, this would necessitate a build out rate of 218 dwellings per annum for the next 11 years for the site to deliver 2040.

11. The above points do not take into account any unexpected matters arising, such as failure to deliver key infrastructure or funding being withdrawn (e.g., railway station).

PS37 Wislowe

Question 21

12. The proposed allocation does not meet Strategic Objective SO1 Accessible Communities in the Plan. The opening paragraph of SO1 states that:

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"New development will be located primarily within or adjacent to large settlements, where people can benefit from existing facilities and services."

13. In the case of the Wisloe allocation (unlike Sharpness) this is a new settlement on the north-western fringe of Cam and in close proximity to the villages of Slimbridge and Cambridge. The latter two settlements cannot be considered a "large settlement" as per the SO as these are Tier 3B and 4A settlements respectively. A further criticism of the allocation is that there is a clear development strategy which seeks to limit development at Tier 3B and below locations on the settlement hierarchy. The real-world impact of this allocation is to effectively amalgamate Slimbridge and Cambridge into the new settlement, creating a wider "greater Cam" urban area. It is surprising to see this allocation proposed, when the units proposed could be better delivered elsewhere at Tier 3A locations in the Plan, supporting the vitality and viability of rural communities across the District.

Question 23

14. The ability of the new settlement to be linked to sustainable transport infrastructure networks is not disputed. Development would be in close proximity to the A38 corridor with its attendant bus services, as well as the railway station at Box Road, Cam. This presents a picture of a development which will be inherently outward looking in its approach, which the opposite of what *could* be achieved at Sharpness if it were ultimately successful.

Question 34

15. SevenHomes is concerned that the housing trajectory for the site, as detailed in Table 6 of the Plan is simply unrealistic. Table 6 of the Plan (p306) assumes that the site will be delivering 565 dwellings in the period 2025 to 2030. This is unrealistic for the following reasons:

- Promotion material on the Wislowe Web-Site states that "the development of a new community at Wislowe" will commence from 2030 onwards. Therefore, the realistic expectation is that housing will not start delivering until 2030 at the earliest.
- Once adopted, outline application is submitted with E.I.A. Outline Planning Permission follows with a S106 Agreement. Currently there is no information

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available to the EIP (pending a Statement of Common Ground being issued) showing what the timetable would be for the submission of the application and the timetabling of its determination.

- It is understood that the parties promoting the site are not housebuilders and do not have experience in delivering large complex strategic housing sites. As a result, there is a need for the site to find a delivery partner. This will require the site to be sold in totality to an experienced housebuilder or in parts, commensurate with the phasing of the site.
- Assuming that an application was submitted by the start of 2024, it is unlikely that the Council would be in a position to determine it positively until early 2025 at the latest, given the need to secure identifiable outcomes on key infrastructure
- In terms of delivery, publicly available research from Lichfields, concludes that sites more than 2,000 dwellings take six to seven years to deliver. This means that it will not deliver first dwellings until 2030/2021 at the earliest.
- Matters could be further delayed by infrastructure requirements and the need/time taken to sell parts of the site to third party developers and to deliver subsequent reserve matters applications. Also given the lack of housebuilder input at this stage, it is not clear as to whether there will be any further refinement of the outline planning permission.