

14th January 2020

Local Plan Review
The Planning Strategy Team
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VIA EMAIL ONLY

Dear Sir/Madam

Representations to Stroud District Local Plan Review, Draft Plan for Consultation (November 2019)

This representation has been prepared by Ridge and Partners LLP in response to Stroud District Council's consultation on the Draft Local Plan (November 2019). This representation is made on behalf of Sharpness Development LLP, the promoter of the new settlement at Sharpness referenced as site PS36 within Stroud District Council's Draft Local Plan for Consultation.

This representation addresses the material set out in the Draft Plan for Consultation (November 2019) and specifically responds to the following questions raised in the consultation:

- 1. Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?*
- 2. Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?*
- 3. Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?*

Overall, these representations support the spatial planning approach taken by Stroud District Council (SDC) relating to the inclusion of a new settlement at Sharpness, referred to hereafter as Sharpness Vale. Sharpness Development LLP has also made a number of previous submissions to SDC in relation to the emerging Local Plan and its evidence base and these have contributed to the ongoing evolution of the proposal and how it will be delivered through the Local Plan. A list of these submissions is set out below:

- Representations to SDC Issues and Options Consultation, including submission of Vision Document (December 2017)
- Representations regarding the Scope of the Sustainability Appraisal (May 2018)
- Representations to Preferred Options Consultation "Emerging Strategy" (January 2019)
- Submission of initial Draft Wintering Bird Survey report to SDC and Natural England (June 2019)
- Submission of updated Initial Concept Plan to SDC, taking into account the latest technical work, constraints and opportunities, including the re-opening of the rail link (September 2019)
- Submission of draft Recreation and Avoidance Strategy to SDC and Natural England (October 2019)

- Submission of updated Vision Document to SDC (November 2019)
- Memorandum of Agreement with Vale of Berkeley Railway (January 2020)

It is worth noting that, at this stage of the proposal, any plans submitted are indicative concept drawings which will be subject to change as further work and engagement is undertaken with key stakeholders and local communities. Nevertheless, the concept plans do provide a clear representation of the aspirations of the proposals for a network of new sustainable neighbourhoods at Sharpness Vale and how they will be delivered during the plan period.

Sharpness Development LLP and their consultant team have been working with SDC officers and have also held discussions and meetings with other key stakeholders that are important to the delivery of the new settlement including, Gloucestershire County Council (GCC), Highways England (HE), Natural England (NE), Environment Agency (EA), Network Rail (NR) and Vale of Berkeley Railway (VoBR).

Sharpness Development LLP has also engaged with Town and Parish Councils including Berkeley, Slimbridge, Hinton and Hamfallow as well as the local action group and further consultation is planned for 2020 as the proposal and Draft Local Plan evolve.

Background to the Proposals

The proposals for Sharpness Vale are to create a new network of natural neighbourhoods, taking guidance from garden village principles. Sharpness Development LLP's aim is to create a pioneering, low carbon network of neighbourhoods that will become an exemplar for future sustainable living and working. The ambition is to allow people to live and work sustainably within the new community and to help reduce the need for people to travel unsustainably. Sharpness Vale will offer employment, high quality homes and sustainable transport, community space, new green spaces and wildlife havens. The proposals specifically provide:

- 10 ha employment;
- Up to 2,400 dwellings by year 2040 (5,000 by 2050);
- A new local centre including shops and community uses;
- New schools;
- Strategic Green Infrastructure, landscaping and open space, including a 400m buffer zone between development and the SPA and the provision of Suitable Alternative Natural Green Space (SANG);
- A primary network of cycle and footpaths within the green corridors linking all neighbourhoods together without the need to travel by car;
- Re-opening of the railway line at Sharpness, including the construction of a new station providing a providing a regular service to Cam & Dursley and onwards to Gloucester;
- Localised road improvements; and
- The delivery of a gigabit-level broadband network.

Sharpness Vale represents part of a fundamental development strategy in the Consultation Draft to ensure that housing and employment needs of SDC are met in a sustainable and positively planned manner up to 2040. The critical mass associated with the delivery of a new settlement, such as Sharpness Vale, enables the provision of

new infrastructure at a scale to benefit both the immediate and wider area. In addition, the proposals will also be designed to allow sustainable growth beyond the period 2040, this will provide a degree of certainty on where and how the District's future growth can be delivered. The opportunity is unique for SDC and will help to ensure a more coordinated and sustainable pattern of development for the future in the District. Overall, the proposals will provide a range of benefits including:

- The design and development of an exemplar new settlement that will facilitate local living, reducing the need to travel long distances for day-to-day needs;
- Helping to significantly reduce the need to travel by car via the provision of reliable, fast and frequent public transport links using new connections to and through the new community;
- Improved public transport connection to the surrounding settlements including a new railway station and re-opening of the existing railway line, dedicated and bespoke coach and bus services will be available from the outset, with links to key employment, education and other destinations;
- An extensive network of new routes for walking, cycling and other "personal transport" modes providing safe and convenient access to the neighbourhoods, employment areas, transport hubs education facilities and the local centre. The layout will give priority and emphasis to these modes over roads, so that it is more convenient to travel sustainably than by private car;
- Improvements to local roads where needed;
- A web of multifunctional Green Infrastructure (GI) permeating throughout the development, including the provision of SANG to absorb human recreational activity, particularly dog walking, away from the Severn Estuary; and
- Delivery of lightning fast broadband in partnership with Virgin Media with top average speeds of 1Gbps to the area.

The estimated economic benefits arising from a development of approximately 5,000 dwellings are also substantial, according to the Home Builders Federation calculator they include:

- The employment of 15,500 people and 170 apprentices, graduates or trainees;
- Increase open space, community sport, leisure spending by £4,031,000;
- Generate £4,031,000 towards education spending which could provide up to 1,900 classroom spaces;
- Generate £60,265,000 in tax revenue including £5,647,300 in council tax revenue; and
- Delivery of around 1,500 new affordable homes.

Overall, the proposed development of a new settlement of this scale presents a significant opportunity to address wider strategic issues which cannot be addressed by smaller scale development or through the expansion of existing infrastructure. The proposals for Sharpness Vale (site reference PS36) will provide for a significant proportion of the employment and housing provision in the District over the plan period and beyond and consequently will have the ability to provide enhanced sustainability and infrastructure improvements.

More importantly, the combination of uses, proposed design, provision of high quality green infrastructure, and the sustainable energy and transport measures proposed for Sharpness Vale will be catalyst for the District to change its approach to development, the proposals will deliver a more sustainable pattern of growth as an exemplar for the

District and the County. Sharpness Development LLP fully supports the Council's pledge to be carbon neutral by 2030 and the proposed allocation of site reference PS36 at Sharpness will address this carbon neutral agenda, delivering a form of sustainable growth as a core principle. The latest Vision Document, provided to SDC in November 2019, outlines the emerging concept and design principles for Sharpness Vale. Overall, the proposed allocation of site PS36 at Sharpness clearly aligns with the Local Plan objective SO5 to promote a development strategy that reduces the District's carbon footprint, adapts to climate change, respects environmental limits and works with nature rather than against it.

Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?

We fully support the Council's preferred strategy for meeting SDC's future growth and development needs across the District, including the proposals for a new settlement at Sharpness under site reference PS36. It is considered that the proposed allocations and their distribution across the District provide the right opportunities and level of economic and housing growth throughout the Plan period and will ensure a mix of development to support the District sustainably, throughout the plan period.

Indeed, the Gfirst LEP Draft Local Industrial Strategy 2019 is also supportive of the approach to future garden towns and villages within Gloucestershire and their ability to put green energy and construction at the heart of their design. The draft Strategy specifically identifies the new settlement at Sharpness as one such development that can deliver this ambition for Gloucestershire and identifies that this proposal, amongst other developments, offers a chance to:

- ensure sustainability is at their heart from the outset;
- pilot new green development and construction (including waste management) policies and initiatives; and
- act as a national pioneer.

Paragraph 72 of the NPPF identifies that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. The proposals for Sharpness Vale (site reference PS36) therefore align with the Government's ambition for ensuring sufficient housing growth, and offer an opportunity for Stroud District to positively plan for a new, sustainable settlement following garden village principles that will be an exemplar for sustainable growth across the County. The proposals offer the opportunity to deliver a scale of development that could become self-sustaining with new infrastructure and the services and facilities required to support a new community.

The site is in a location where sustainability can be enhanced, resulting in the development of a new settlement, with new infrastructure provision that simply cannot be achieved with smaller and more piecemeal developments. For example, the provision of a planned network of pedestrian, cycle and other personal transport routes, new rail provision (through the re-opening for passenger traffic of the existing railway line) and dedicated bus routes. Sharpness Development LLP therefore fully support the supporting text at page 121 which identifies that Sharpness would become a Tier 2 Local Service Centre once the development is complete. Sharpness Development LLP has previously submitted representations which demonstrate the feasibility and deliverability of such provision.

As we have previously identified in earlier representations, the opportunities for a net gain in biodiversity and infrastructure that can be provided by a development such as Sharpness Vale are much harder to achieve with 'bolt on' urban extensions to existing areas and smaller more piecemeal developments. Urban extensions are often less distinctive and place a greater burden on the existing infrastructure of the area with limited opportunities to secure the new infrastructure that the District needs. The provision of a new settlement at site PS36, Sharpness Vale, is a

more sustainable and comprehensive option that is also consistent with the Local Plan's pledge of meeting a carbon neutral agenda by 2030.

Sharpness Development LLP considers that land at Sharpness could deliver around 5,000 new homes overall and a 10-hectare business park as part of the development. New housing would be delivered through a series of inter-linked neighbourhood areas, together with a comprehensive package of accompanying infrastructure to meet housing needs up to 2040 and beyond and the new employment land will be delivered as a business park within the heart of the new settlement. Overall, Sharpness can assist in accommodating the immediate needs of the District up to 2040 as well as providing the opportunity for a planned growth point beyond this period, thereby providing greater certainty on future growth in the District and fulfilling the three dimensions of sustainable development, economic, social and environmental, as set out in NPPF paragraph 7. The length of time during which the development is envisaged to occur will allow for technological advances to be incorporated, a difficult task for smaller sites.

In this regard, Sharpness Development LLP are also fully supportive of the projected delivery rates identified at page 193 of the draft Local Plan in respect of Sharpness. It is considered that whilst these rates perhaps take a more cautious approach, it is considered these figures are readily achievable at Sharpness Vale. An indicative deliverability timeline has already been outlined in previous discussions with the LPA identifying that the LLP may indeed be able to exceed the delivery rates identified by the Council at page 193. It is acknowledged that the range of infrastructure proposed will require ongoing liaison of key stakeholders and we are confident that the positive plan-led approach of SDC will ensure that appropriate strategic direction and certainty is provided.

Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?

At this point Sharpness Development LLP has no issues to raise in respect of the proposed site allocation PS36 at Sharpness. We would note that significant work has already been undertaken regarding the delivery of the proposed new settlement at Sharpness. In summary, the technical work undertaken to date in respect of hydrology, accessibility, ecology, landscape and heritage demonstrates that there are no insurmountable constraints that would restrict the delivery of the proposals and that there are viable and feasible solutions to mitigate the impacts of development.

In terms of specific constraints, needs and opportunities to be reflected in the final site allocation policies we note that the draft Local Plan does not yet include any specific policy relating to the SPA, and the HRA supporting the draft Local Plan identifies the need for further investigation to inform potential impacts and the need for mitigation. In this regard, we would highlight that Sharpness Development LLP has previously submitted to SDC and NE a draft Recreation and Avoidance Strategy, including draft policy, in relation to the proposals at Sharpness Vale and my client would be pleased to discuss this further with officers if useful.

Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?

Overall, the proposed draft site allocation PS36 and accompanying text is supported. At the same time, it is considered that the number of new dwellings up to 2040 should not necessarily be identified as a 'cap' but should be identified as a minimum figure, thus allowing for additional growth (where suitable) subject to consideration against other policies within the plan. It is important to ensure that there is flexibility in any policy that may apply to

the site, this is consistent with para 11a of the NPPF which refers to the need for local plans to be sufficiently flexible to deal with rapid change (e.g. economic and technological change).

With regard to education provision, Sharpness Development LLP are engaged in ongoing discussions with GCC on education provision and would welcome discussions on this with SDC in due course. Sharpness Development LLP also support the drafting of more detailed policy wording in respect of infrastructure provision and other mitigation and would be pleased to discuss this further with Officers prior to the finalisation of the draft plan.

We also note that the information contained on the plan's key on page 121 of the Consultation Draft Plan, is labelled as "indicative" which Sharpness Development LLP support - it is considered important to keep in mind that plans will be subject to change as further work and engagement is undertaken with key stakeholders and local communities.

In respect of the supporting text for proposed site allocation PS36 regarding Garden City Principles as defined by the Town and Country Planning Association, it is considered that this is helpful in providing the context on the types of principles that the proposals at Sharpness Vale is considering in the ongoing development of the proposals. However, it is also worth noting that the Government's Garden Communities' Prospectus¹ does not prescribe a single template for a garden community. Equally, the Town and Country Planning Association report "Understanding Garden Villages: An Introductory Guide"² identifies at Page 12:

"The Garden City principles are not a blueprint or rigid set of rules for creating new places. They are simply a framework for good place-making, delivery and management, within which innovation and imagination should be applied to the specific context of individual projects and locations. The Locally-Led Garden Villages, Towns and Cities prospectus encourages local authorities applying for funding to embed the Garden City principles within their proposals. However, demonstrating that all the principles will be applied is not a pre-requisite of receiving support through the programme..."

Finally, in respect of delivery Policy EI12 which states: "development should be located in areas which are already well served by public transport and have access to a range of local facilities within walking and cycling distance." we would note that the policy wording doesn't necessarily reflect the wording of para 103 of the NPPF. That paragraph identifies that "significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes." (our emphasis). This should therefore also be reflected in the transport and highways policies of the Local Plan.

Conclusion

These representations support the spatial planning approach taken by Stroud District Council (SDC) in its Draft Local Plan for consultation, particularly in relation to the inclusion of a new settlement at Sharpness under draft site allocation PS36. The strategy accords with the guidance contained in the NPPF which identifies that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

The technical work undertaken to date demonstrates that the proposals are deliverable in accordance with the projected delivery rates set out at page 193 of the Draft Local Plan for consultation. Overall, the proposals for

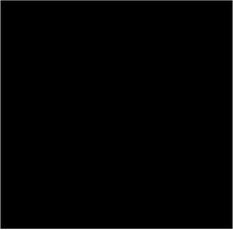
¹ Paragraph 2, Garden Communities, August 2018, Ministry of Housing, Communities and Local Government

² Published January 2018

Sharpness Vale offer an opportunity for SDC to positively plan for a new, sustainable settlement guided by garden village principles. The proposals for Sharpness Vale will also deliver a scale of development that will become self-sustaining with new infrastructure, services and facilities required to support a new community as well as having the necessary flexibility to accord with economic and technological change.

I trust that this letter will be taken into consideration. Please don't hesitate to contact me should you have any queries.

Yours faithfully



Ridge and Partners LLP