



EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

MATTER 5:

New settlements at Sharpness and Wisloe

On behalf of: Robert Hitchins Ltd

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Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 5, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 6a
- Matter 6c
- Matter 6d
- Matter 6g
- Matter 7
 - Matter 7a
 - Matter 7b
 - Matter 7c
- Matter 8
- Matter 10
 - Matter 10a
 - Matter 10c
 - Matter 10d
- Matter 11
 - Matter 11a
 - Matter 11b
 - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



CONTENTS:

	Page No:
5. MATTER 5 - NEW SETTLEMENTS AT SHARPNESS AND WISLOE	1
5.1 Issue 5 - Are the proposed new settlement allocations at Sharpness and Wisloe justified, effective and consistent with national policy?	1



5. MATTER 5 – NEW SETTLEMENTS AT SHARPNESS AND WISLOE

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

5.1 Pegasus has submitted extensive representations on behalf of Robert Hitchins Ltd objecting to the proposed new settlement at Sharpness. In our view the proposed allocation in PS36 is unsound, not justified and neither is it effective or consistent with national policy. Our objections to the Reg 19 Plan focused on the following:

- Location
- Delivery-trajectory
- Sustainability Appraisal
- Transport
- Traffic Modelling
- Infrastructure Delivery Plan
- Flood Risk
- Economic Strategy and
- Viability

5.2 Our objections were supported by our response to the Additional Technical Consultation in October 2022.

5.3 Pegasus has submitted representations on PS37 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). Consequently, this undermines the soundness of the plan, particularly as the Plan is also reliant upon another garden village within the same cluster.

Strategic Site Allocation Policy PS36 Sharpness new settlement

The policy proposes the allocation of land south and east of Newtown and Sharpness for a new mixed use garden community. This includes up to 2,400 dwellings by 2040 and 10ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. This includes 25 criteria to be addressed.

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?

1.1 The proposed allocation does not meet the vision, spatial strategy and strategic objectives of the Plan – please see our representations in response to PS36. The allocation does not support the climate change agenda and is not located on the Main Movement Corridor as defined in the Stroud Sustainable Transport Strategy.



1.2 The location is not considered to be sustainable or indeed one that can be made sustainable, so therefore it is not consistent with the NPPF and the Stroud Sustainable Transport Strategy, which states that sustainable transport needs to be at the heart of planning for growth.

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

2.1 The simple answer is that the evidence does not demonstrate that the proposal will accord with the sustainable ethos. Fundamentally, the site is not within easy commuting distance and where the jobs are more likely to be i.e., where employers want to locate.

2.2 The site is not within the Main Movement Corridor and consequently the ability to secure integrated and accessible transport systems is at significant risk (see our representations to the Additional Technical Evidence consultation in Sept/Oct 2022)

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?

3.1 In our representations we stated that it was clear from the IDP that there are several areas of infrastructure which raise significant concerns about delivery of the proposed development and also the timing and availability of infrastructure which may well affect the viability of the proposed development. These do not appear to be addressed in the policy. Furthermore, the Additional Technical Consultation did not address these concerns, in fact it highlighted the severity and significance of the shortcomings of development at Sharpness.

3.2 We do not consider the proposal for a self-contained garden community to be realistic or viable. It is not located in a sustainable location and as demonstrated in our response to the Additional Technical Consultation the Sustainable Transport Strategy Addendum (STS) (EB108) does nothing to change our conclusions from our previous representations that the PS36 Sharpness allocation is in an unsustainable location some significant distance from the main movement corridors and major centres of employment. It does not offer a realistic choice of sustainable transport modes; the proposed new rail service cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is in question. Consequently, development here will encourage travel by car which will have a significantly negative impact on air quality and do little to improve traffic congestion.

3.3 Since the Reg 19 Plan was prepared in May 2021, almost two years ago, no trajectory has been provided in accordance with the NPPF paragraph 73 and 67. The limited information in Table 6 on page 306 of the Plan envisaged development commencing in 2025, which is now only 2 years away. Topic Paper Housing Needs and Supply October 2021 (EB8) does not include a trajectory it merely repeats Figure 1 from the Local Plan.

3.4 Research undertaken by Lichfield has found that average time from validation of an outline to the delivery of the first dwellings for large sites is from 5yrs to 8.4 years depending on the size of the site. For a site in excess of 2,000 dwellings, such as Sharpness, the average time frame from validation of the first application to completion of the first dwelling was 8.4 years. Consequently, even if an application were submitted in 2023 it would be at least 2031 before the first dwellings were

completed, some six years later than the Plan envisages in a location which is not necessarily attractive to the market and has fundamental issues in terms of delivery of infrastructure. This delay would undermine the contributions from the site in the plan period. Whereas a smaller site of up to 1,000 dwellings the delivery timeframe for completion of the first dwellings is 5yrs.

4. In relation to infrastructure:

- a. 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?
- b. 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.
- c. 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?
 - ii. What level and frequency of rail service is proposed and is this supported by Network Rail and relevant service providers?
 - iii. Has funding been identified to support the delivery of this scheme?
 - iv. What are the proposed timescales for its delivery and would it be in time to support the new settlement?
- d. 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?
- e. 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?

- 4.1 Our previous representations have highlighted that the traffic modelling is likely to underestimate the traffic impacts on the wider highway network from the proposed allocation at Sharpness. Further mitigation to that identified in the 'Preferred Highway Mitigation Strategy' will be likely should the development traffic reductions assumed by the sustainable travel incentives and/or assumed self-containment / distribution patterns not be realised.
- 4.2 Even with the overstated assumptions in the traffic modelling, the Traffic Forecasting Report Addendum (EB98) and IDP Addendum (EB110) identifies that significant highway mitigation would be needed to facilitate development at Sharpness; the routes connecting Sharpness to the A38 and M5 are not suitable to accommodate the additional levels of traffic without significant highway mitigation. This includes a new grade separated junction at M5 J14; such an improvement would be very costly and would take time to deliver. The timing of the works to M4 J14 would likely affect the delivery of development at Sharpness; given the existing capacity issues the improvement would be needed prior to any significant development.
- 4.3 The reopening of the Sharpness branch line for rail passenger services and the provision of a new station is required to underpin the transport offer from Sharpness. There is no evidence to demonstrate this can be achieved. The Rail Service Viability Statement of Opinion for GCC included with GCC's Reg 19 representations, concluded that:
- “the scheme does not currently have a compelling business case. It requires an investment of £34.85m and the resulting service will require subsidy on an ongoing basis... It is our opinion that, based upon the current situation, that there are considerable risks to this scheme which make it unlikely that it would gain the necessary approvals for the scheme to progress to delivery.”**
- 4.4 The IDP Addendum (EB110) has attributed a figure of £1.11m as the contribution from Sharpness (PS36), with a further £0.39m from Sharpness Docks (PS34); this amounts to approx. £1.25m to secure this infrastructure. This is nowhere near the “tens of millions” suggested by Network Rail or the £34.85m identified in GCC's Rail Service Viability Statement of Opinion. This questions the deliverability of the scheme; without it the development at Sharpness can be considered unsustainable.
- 4.5 Furthermore, the Network Rail Bristol-Birmingham Strategic Rail Study (June 2021) strongly indicates that main line train paths do not exist to provide a rail service from Sharpness. The increase in train frequency planned for the mainline effectively rules out any remote chance of the Sharpness promoters rail strategy being capable of being delivered, even if it was viable.
- 4.6 The commercial case to provide a relevant bus or coach-based public transport service from Sharpness is very questionable; both GCC and Stagecoach in their representations to the Local Plan have expressed concerns about the promoters overly ambitious bus journey times and estimated modal share values which they consider are not reflective of typical transport demand in Gloucestershire.
- 4.7 The transport measures proposed for Sharpness are not considered viable or deliverable; the mode share values given for bus and rail travel do not reflect evidence in other locations with similar, dislocated attributes, both geographically and in terms of transport opportunities.

4.8 The PS36 Sharpness allocation is in an unsustainable location (illustrated in Figure 1 below) some significant distance from the main movement corridors and major centres of employment. It does not offer a realistic choice of sustainable transport modes; the proposed new rail service cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is questionable. Consequently, the development will encourage travel by car which will have a significantly negative impact on air quality and do little to improve traffic congestion.

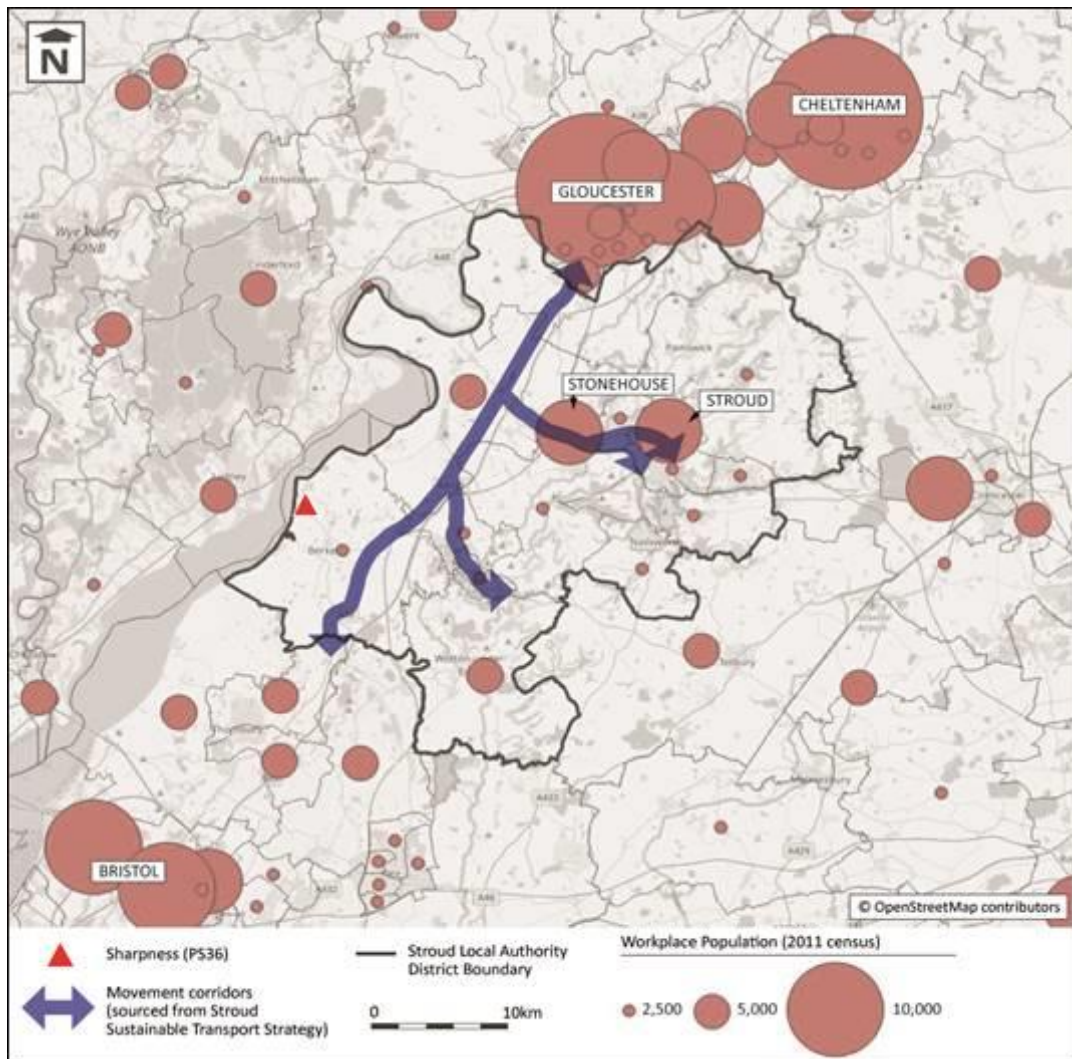


Figure 1: Remoteness of Sharpness to employment and STS movement corridors

5. Has the effect of the development on the existing Sharpness Waste Water Treatment Works been adequately assessed? Will capacity improvement be required and if so, how will this be delivered and funded?

5.1 The IDP June 2021 (EB69) page 143 states that:

“Wessex Water provide wastewater services to some southern parts of the district, including Sharpness. Here, they forecast that no capacity improvements to Sharpness Sewage Treatment Works were required

before 2020, however improvements to increase the sewer network would be necessary to support the proposed developments. ”

5.2 EB69 page 158 raises the issues that:

“Within Wessex Water’s next Business Plan (2020–25) there are no improvements planned for Sharpness STW. An appraisal is required to better understand the potential impact that the new settlement at Sharpness (PS36) will have on the STW, as proposed growth triples the existing flows. Capacity improvements may not be possible within its existing environmental constraints, so the developer should contact Wessex Water for this assessment. Wessex Water also notes that the site is adjacent to the STW and so the impact of odour and flies on the development should be assessed.”

5.3 Sharpness is considered to be high risk i.e., existing capacity is not available and providing new capacity will involve Environment Agency consent review and/or construction outside of the existing STW boundary.

5.4 Subsequently the IDP 2022 Addendum (EB110) provides no information on this matter. It is clear from the representations to the plan (Wessex Water 280) that they recommend that further assessment is carried out on the impact of the new settlement on the existing Water Treatment Works, (SLP-01a – page 262):

“If the foul flows from the new settlement are to be treated at the Sharpness WwTW this represents a significant increase in flows. An appraisal will be required to assess whether capacity improvements will be possible within existing environmental constraints.”

5.5 Consequently, it is clear that capacity improvement will be required, although exactly what has not been assessed or how it will be funded – this is not addressed in EB110.

6. The text accompanying the policy acknowledges the site is near to areas subject to flooding and that the disposal of surface water flooding will need careful consideration to ensure that neither the development or adjoining areas are at risk of flooding or exacerbating existing areas of flooding. How will this be achieved?

6.1 This is a matter for the site promoters to demonstrate.

7. Does the policy sufficiently ensure that the risk to existing flood risk management assets (due to climate change, rising sea levels and natural deterioration) will be addressed?

7.1 This is a matter for the site promoters to demonstrate.

7.2 Section 7 of our representations to the Reg 19 Plan Policy PS36 outlines our objections to the site.

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?**
- 8.1 This is a matter for the site promoters to demonstrate.
9. **Has the potential of canal towpath degradation due to increased usage by future occupants of the development been considered? How would this issue be mitigated and addressed if necessary?**
- 9.1 This is a matter for the site promoters to demonstrate.
10. **The text accompanying the policy lists a number of mitigation measures required due to the proximity of the site to the Severn Estuary SAC/SPA/Ramsar site. Taking account of these measures, will there be an effect on the developable area of the site that could impact on site densities or overall quantum of development?**
- 10.1 This is a matter for the site promoters to demonstrate.
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?**
- 11.1 This is a matter for the site promoters to demonstrate.
12. **Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective?**
- 12.1 This is a matter for the site promoters to demonstrate.
13. **How has the amount of employment land been determined and is this sufficient to ensure the site limits the need to travel and is self-sustaining? Are there job growth estimates and are these realistic?**
- 13.1 Section 8 of our representations to the Reg 19 Plan Policy PS36 outlines our objections to the site.
- 13.2 There are fundamental issues which have not been addressed in respect of the location, whether it is a sustainable and attractive location for economic growth. It is not clear what the demand is for businesses to locate at Sharpness. Proposing significant development which is not consistent with the current SEP is a high-risk strategy and pre-judges further work. PS36 Sharpness allocation is in an unsustainable location, some significant distance from the main movement corridors and major centres of employment. It does not offer a realistic choice of sustainable transport

modes; the proposed new rail service cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is in question. Consequently, development here will encourage travel by car which will have a significantly negative impact on air quality and do little to improve traffic congestion.

13.3 A site in the adopted Local Plan 2015 that was allocated for 300 dwellings and 7 hectares of employment land for expansion has still yet to come forward (an outline application S.17/0798/OUT was submitted in 2017 and remains undetermined). This must bring into question the attractiveness of this location to the market.

13.4 It is clear that Sharpness cannot compete with sites that are located close to the main movement corridors as identified in the STS, where improvements to facilitate travel by alternative more sustainable modes of transport would be much more readily achieved, and which are favourably located in relation to employment destinations including Stonehouse, Stroud, and Gloucester.

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?

14.1 This is a matter for Stroud District Council.

15. Is the site boundary as shown on the policies map accurate?

15.1 This is a matter for Stroud District Council.

16. General site layout / masterplanning questions:

- a. Will the site be delivered in accordance with active design policies?
- b. How will landscaping and layout address any visual impacts from the site's development?
- c. A comprehensive green infrastructure network is referred to in the text accompanying the policy. How will the policy ensure that this is designed and delivered as part of any future development proposal? How will this infrastructure be funded?
- d. Design codes are referred to in order to ensure development is zero carbon and responds to the local context, specifically landscape and heritage elements. How and when will these design codes be brought forward? What will their status be?

16.1 These are matters for Stroud District Council.



17. **Is the policy approach to the application of local standards for sports provision justified and effective? Should the policy define the required local provision depending on the size of development?**
- 17.1 This is a matter for Stroud District Council.
18. **Will the HSE consultation on minimum distance for ammonium nitrate storage at Sharpness Docks impact upon the allocation?**
- 18.1 This is a matter for Stroud District Council.
19. **The text accompanying the policy refers to community engagement and stewardship as being key to delivering a new community in line with garden city principles. How will this be achieved?**
- 19.1 This is a matter for Stroud District Council and the promoter of the site.
20. **Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?**
- 20.1 It is clear from the IDP that there are several areas of infrastructure which raise significant concerns about delivery of the proposed development and also the timing and availability of infrastructure which may well affect the viability of the proposed development. These do not appear to be addressed in the policy.
- 20.2 This was an issue which led to the new garden communities in Essex Local Plans being removed from the Local Plans, albeit they were significantly larger new communities, the Inspector concluded that the new communities should be removed from the Plan because they were not viable, and it could not be demonstrated that supporting infrastructure could be delivered.
- 20.3 Our representations to the Reg 19 Plan and the Additional Technical Evidence explain in detail our objections to the site. In summary there appears to be no certainty, clarity of what is proposed or the timing of the provision of new infrastructure to support the proposed allocation; consequently, the allocation is not justified and effective and the inclusion of the new community at Sharpness seriously undermines the delivery of the site and the soundness of the Plan.

Strategic Site Allocation Policy PS37 Wisloe new settlement (within the Berkeley Cluster)

The policy proposes the allocation of land at Wisloe for a new mixed use garden community, including approximately 1,500 new dwellings and 5ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. The policy lists 24 elements to be addressed.

21. **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?**

21.1 We have not objected to the location of the development; our concerns focus on the scale and delivery of the proposed new settlement without being promoted by an experience land promoter or housebuilders.

22. Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities? Is the site of sufficient scale for the delivery of the garden city principles to be feasible? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period?

22.1 It is considered that the proposal is of an insufficient scale to deliver the garden city principles. The scale of development at 1,500 dwellings is at the minimum considered in the in the MHCLG Garden Communities Prospectus (August 2018) i.e. (1,500 – 10,000 homes) and was unsuccessful in terms of its bid to MHCLG. Consequently, it must be assumed that the garden community does not fulfil the assessment criteria in which case this undermines its inclusion in the Local Plan. This must raise questions about viability particularly as no housebuilder is involved with the promotion of the site. The proposed allocation is not sound.

22.2 Furthermore, it does not have the ability to expand substantially into the future, which is one of the limitations of the site (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). The MHCLG prospectus (August 2018) stated that proposals must be of sufficient scale to be largely self-sustaining and genuinely mixed use as per paragraphs 13 b – c of the prospectus.

22.3 According to the Prospectus, proposals can be for a discrete new settlement or take the form of transformational development of an existing settlement. In this case 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. It is considered that development of this scale would not be sufficient to deliver the infrastructure and facilities and services required to achieve its objectives of self-containment.

22.4 The trajectory as set out in the Plan on page 306 envisages 1,500 dwellings being completed in the plan period to 2040 and assumes that in the first five years 2020–2025 that 50 dwellings will be delivered. At the time of writing, we have seen no evidence of an up to date trajectory (it is noted that the promoters in their submission of July 2021 envisaged outline planning approval in phase 1 [2020–2025] and delivery on the first parcel in 2024 – 2026. Their phasing strategy assumes completions of about 60 dwellings per annum and thereafter 120 dwellings per annum, commencing in 2025 (Masterplan Report Part 1 July 2021).

22.5 Well documented research by Lichfields “Start to Finish” concludes that from the date of 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 were submitted in 2023 for Wisole, the site would not start to deliver dwellings until mid – end of 2028 at the earliest. In addition, there is no evidence of a housebuilder or a land promoter with a good track record on delivery, this does appear to have been factored into the delivery.

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

23. Will the proposed new settlement be suitably connected to sustainable transport infrastructure networks to ensure that future residents are able to access an essential range of services, facilities and employment opportunities?

23.1 No comments.

24. In relation to infrastructure:

- a. Will infrastructure to support the allocations be delivered at the right time and in the right place?
- b. Are the proposed rail link to the north and the express coach service to the south viable and deliverable? Have funding sources been identified? Will they be delivered on time to support the new settlement? Have discussions taken place with the relevant infrastructure providers and do they support the projects?
- c. 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? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14.
- d. Will the location of the high pressure gas pipeline that runs through the site constrain the proposed development in anyway? What effect, if any, will the presence of the gas pipeline have on the viability of developing the site?
- e. Has the effect of the proposed new settlement on the Sharpness Waste Water Treatment Works been adequately assessed? If capacity improvements are necessary can they be delivered within existing environmental constraints and how will they be funded?

24.1 These are matter for the Council and the site promoter to address.

25. Is the site boundary as shown on the proposals map accurate and is it justified?

25.1 These are matter for the Council and the site promoter to address.

26. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective?

26.1 These are matter for the Council and the site promoter to address.



27. Will any impacts on the nearby Severn Estuary SPA/SAC Ramsar Site and SSI be adequately mitigated?

27.1 These are matter for the Council and the site promoter to address.

28. In relation to general site layout / masterplanning:

- a. **Will the site be delivered in accordance with active design policies?**
- b. **If key landscape corridors are to be retained and kept free from development, will there be sufficient scope within the site to deliver 1500 dwellings at an appropriate density?**
- c. **How will landscaping and layout address any visual impacts from the site's development?**
- d. **Has sufficient assessment been undertaken of any heritage and / or archaeological factors that may affect the site? For example, comments from Historic England refer to the site containing archaeology from medieval, potentially Roman and prehistoric eras. Does the policy adequately reflect any recommendations from relevant evidence base studies and assessments? Should reference be included in the policy to the need for development to take account of any potentially nationally significant features and the need to conserve them?**

28.1 These are matter for the Council and the site promoter to address.

29. The site lies within a Minerals Safeguarding Area. What steps, if any, will need to be taken prior to any development to ensure that this issue is mitigated? If extraction is required prior to any development taking place will this affect the viability or timescales for developing the site?

29.1 This is a matter for the County as the Mineral Planning Authority to address.

29.2 If extraction is required this will undoubtedly affect the timescales for developing the site and consequently its contribution to meeting local housing needs. It will undermine the deliverability of the plan and consequently the soundness of the plan.

30. Is the policy approach to the application of local standards for sports provision justified and effective? Should the policy define the required local provision depending on the size of development?

30.1 These are matter for the Council and the site promoter to address.

31. Does the policy sufficiently ensure that the risk to existing flood risk management assets (due to climate change, rising sea levels and natural deterioration) will be addressed?

31.1 These are matter for the Council and the site promoter to address.



32. Has the potential of canal towpath degradation due to increased usage by future occupants of the development been considered? How would this issue be mitigated and addressed if necessary?

32.1 These are matter for the Council and the site promoter to address.

33. Reference has been made to footpaths across the site that cross the railway. What is Network Rail's view on this issue? Are there any safety implications that the proposed development would need to take account of? Does the policy need to refer to this?

33.1 This is a matter for Network Rail, the Council, and the site promoter to address.

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

34.1 See response to Question 22 above.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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