

**EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN
REVIEW**

Hearing Statement on Behalf of Vistry Group
Matter 5: New Settlements at Sharpness and Wisloe

Respondent Ref: 912

February 2023

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1. The following Hearing Statement has been prepared on behalf of Vistry Group in relation to Inspector's Matter 5: New Settlements at Sharpness and Wisloe. This Statement addresses questions raised by the Inspector of relevance to previous representations made by BBA Architects and Planners on behalf of Vistry Group, and should be read in conjunction with those representations.
2. This statement covers the Inspectors Issue 5, and questions 1, 3, 10, 11, 20 21, and 34. The Inspectors have set a separate set of questions for Sharpness and Wisloe, but for ease of reference and to reduce the word count the relevant questions for each new settlement are covered together.

Q1 & 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 are met?

3. The Council's vision for the district is set out on page 19 of the Stroud District Local Plan review Resubmission Draft Plan (Draft LP). The vision focuses on supporting "*a network of market towns*" and mentions how each town will contribute to the wider economy. New communities and settlements are not mentioned in the Vision and it is therefore not clear how Sharpness and Wisloe fit in within the overall vision for Stroud. The proposed focus of development and housing delivery at the two new settlements will also limit the amount of development spread throughout the district and supporting the existing settlements, including the network of market towns and villages, to thrive.
4. The focus of housing and employment at two new settlements will also not achieve the strategic objectives of the plan which focus on, in particular, developing communities, supporting town centres and providing strong, diverse vibrant local economies. These objectives can only be achieved by investment and development of existing settlements, which the proposed focus on two new settlements will limit.
5. The Development Strategy is stated as being based upon a "*hybrid option...which incorporates some of the most sustainable and deliverable aspects of the four strategy options...and makes use of the most suitable potential sites*". However, this is simply not the case. The Strategy now proposes focusing 43% of housing allocated (3,900 dwellings) at two new settlements, which means there is a distorted focus on development at new settlements rather than existing sustainable locations. The option in relation to a new growth point (Option 4) proposed the creation of a single new settlement; however with the 'hybrid' option there are now two and therefore more of a focus on new growth points than envisaged in option 4. This results in certain parts of the district (such as the Wotton Cluster) being proposed minimal allocations and the most sustainable sites in this area remaining unallocated.

Q3. 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?

Q20. & 34 Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?

6. Large scale developments, let alone proposed new settlements such as these will take a considerable period of time before any applications, development or completions take place. The issues highlighted above could potentially delay or limit the amount of anticipated development, and the significant amount of new infrastructure, plus large numbers of different ownerships leading to complex land assembly (as noted in The Strategic Assessment of Land Availability, 2017) can also complicate and delay delivery.

7. A reasonable delivery assumption in relation the Sharpness new settlement site is as follows (It is anticipated that Wisloe would share a similar programme):

Stage	Date	Note
Adoption of Local Plan	Summer 2023	
Submission of Outline	Summer 2024	1 year to prepare outline application
Determination of outline	Winter 2026	18 months for determination
First Reserved Matters	Autumn 2026	8 months to prepare RM
Reserved Matters determined and pre-commencement conditions discharged	Autumn 2027	
Commencement on site	Spring 2028	

8. Table 6 on page 306 of the Draft LP shows 500 dwellings being completed at Sharpness New Settlement between 2025 to 2030. The above demonstrates that the projected delivery rates set out within the Draft LP are wholly unrealistic.

9. The delivery rate from Sharpness new Settlement is uncertain given that it will be directly competing with both the allocation at Sharpness (300 dwellings) and the proposed new settlement at Wisloe (only circa 4 miles away). However, even if an optimistic rate of 100 dwellings per annum (from 2 outlets) is assumed this would only deliver c 1,200 dwellings, 1200 dwellings short of the allocation. Similarly given the proximity of the two new settlements, it is unlikely that Wisloe will achieve the delivery rates put forward in the Draft LP. This highlights the issue of proposing two new settlements very close to each other which will affect the delivery of both.

10. Indeed delivery from the majority of the strategic sites can be questioned as a result of the proximity of each site and therefore the competition between them. Huntsgrove (750 dwellings) is very close to South of Hardwicke (1,350) and Wisloe, is not only 4 miles from Sharpness, it is also adjacent to sites at Cam (totalling 1,080).

11. Furthermore, viability of any scheme is largely unknown until the full suite of baseline technical and environmental assessments have been carried out to understand fully the site's constraints and to inform the development of a deliverable masterplan. The viability and

therefore deliverability of the new settlements cannot be confirmed and therefore this has a potential impact on timing of delivery.

- Q10. 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?**
- Q11. 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?**
12. The Sharpness site is adjacent to Lydney Cliff SSSI and Severn Estuary SAC as identified on Map 3 and adjacent to Flood Zone 3. It is noted that Natural England consider the Sharpness new settlement sound and welcome the suite of mitigation measures proposed to address the proximity of the site to the SSSI and SAC. However, as a principle, the Council should be looking to allocate and develop sites in less sensitive locations first before exploring the large scale development of sites such as Sharpness. Development at the proposed allocation would be contrary to proposed policy DCP1 (bullet point 6) which states new development must be: *Designed to reduce vulnerability to and provide resilience from the impacts arising from changing climate, for example by locating and designing development to reduce the risk of flooding and to establish coherent and resilient ecological networks.*
13. It is also contrary to Core policy CP5 (Environmental development principles for strategic sites) which required strategic sites to be low impact in terms of the environment, and the array of mitigation required (outlined at para 3.5.22 of the pre-submission draft plan) suggests that this is not the case at Sharpness.
14. It is also not clear how development at Sharpness would meet the requirements of Policy ES3 and ES4 in relation to flood risk.
15. Sharpness as a strategic location has not been fully justified and reasonable alternatives have not been appropriately considered.