

# HEARING STATEMENT ON BEHALF OF COTSWOLD HOMES LTD

Stroud District Local Plan Review Matter 5: Sharpness and Wisloe

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## REPORT

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## ISSUE 5 SHARPNESS AND WISLOE

This statement has been prepared by RPS on behalf of Cotswold Homes LTD (“CH”) in respect of their interests at Bath Road, Leonard Stanley. It considers the deliverability of the proposed garden village and the contribution that can be expected from the supply during the plan period.

### Issue

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

### PS36 Land South and East of Sharpness:

#### Q1. Does the policy meet the vision, spatial strategy and strategic objectives set out in the plan? Does the policy ensure that these objectives be met?

- 1.1 The overall spatial strategy for the District is set out in Section 2.3 of the submission plan [EXAM CD1]. This emerges from the issues and options document which concluded with a hybrid option “with one of two growth points and some wider dispersal to the smaller towns and larger villages”.
- 1.2 Whilst this could fit within that vision, CH is mindful that the plan has a heavy reliance on strategic sites. At present, 8,800 homes (89%) are being delivered through strategic sites. CH is of the view that this is a considerable quantum, and compliance with the spatial strategy should be considered through the lens of this figure.
- 1.3 Turning to the Sharpness growth cluster, the Plan presents as an allocation of 2,400 dwellings and 10ha of employment land, however, when read alongside other nearby sites (detailed in the table below), this presents a significantly larger allocation.

**Table 1: Accumulated Sharpness and Berkeley Allocations**

Allocation	Strategy	No. of Dwellings
Land South and East of Newton and Sharpness	PS36	2,400 (5,000 by 2050)
Sharpness Docks	PS34	300
Land at Focus School	PS35	70
Land North West of Berkeley	PS33	110
Land at Lynch Road	BER016/17	60
<b>Total</b>		<b>2,950 (5,540)</b>

- 1.4 This affords the Sharpness/Berkley cluster a total combined allocation across the plan and the plan review of 2,940 dwellings with a potential total of 5,540 dwellings.
- 1.5 Here, CH returns to what the Plan is setting out to achieve. Paragraph 2.3.6 of the Submission plan states that a clear goal of the plan is to “concentrate housing growth at the main towns of Cam & Dursley, Stonehouse and Stroud where there is the best access to services, jobs and infrastructure and will support the regeneration of the canal corridor through the Stroud Valleys”.

1.6 It is unclear to CH where this concentration of housing growth around Stonehouse and Stroud is occurring, and instead a vast proportion of housing is being delivered at a location within the district with limited existing infrastructure that brings inherent questions about their feasibility, at least in the short-medium term.

**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?**

1.7 The proposals require significant time and investment in order to achieve a deliverable outcome, aligned with garden village principles. For the proposals at Sharpness (PS36) the timescale is given for “up to 2,400 dwellings by year 2040, 10ha employment local centre, community uses and open space.”

1.8 In the absence of clear evidence, CH turns to the Lichfield’s “start-to-finish document”<sup>1</sup> which examines the time taken to achieve the delivery of strategic sites such as this. This assessment has found that historically, it takes around 6 years from the validation of an application for over 2,000 dwellings to achieve planning permission and complete the first dwelling. There is not currently an application before the Council for consideration, however even if a scheme was submitted this year, it would be unrealistic to expect any delivery until around 2030. This contrasts with the Council’s estimates of delivery, which see 500 completions from the site during the period 2025-2030.

1.9 Whilst it may be possible for the other allocations to receive earlier permissions, doing so would be problematic given the inherent co-dependency that they have on the primary ps36 site for an informative basis with which to make an application on matters such as infrastructure.

1.10 Furthermore, the Start to Finish document also provides guidance in terms of build out rates. As indicated in Table 3 of the study (Appendix 1, P14), larger sites of over 2,000 dwellings deliver at a rate of 160 dwellings per annum (“dpa”) meaning that the site would likely take 15 years to build out, meaning that its delivery is unlikely to be achieved until 2045, making an additional 1,500 homes by 2050 look highly doubtful.

1.11 **4Civ) In relation to infrastructure, the policy refers to a new railway station being delivered on the Sharpness Branch line as part of the development. What are the proposed timescales for its delivery, and would it be in time to support the new settlement?**

1.12 CH would raise concerns relating to the delivery of the new station, and the ambitions for this coming forward in a timely manner. CH would like to draw attention to long-held plans within the District for the reopening of an additional station along the Bristol-Birmingham Line at Stonehouse where the proposals have now received some support from department of transport.

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<sup>1</sup> <https://lichfields.uk/content/insights/start-to-finish> (Appended to this statement)

1.13 This brings the potential for two additional stations north of Bristol with significantly more capacity on the line. Furthermore, it should be noted that these proposals have been a long-term transport-related goal of the LPA and have been difficult to achieve with plans to reopen the station dating back to 2017<sup>2</sup>. Building a similar business case for a station that historically is not on the mainline, around a proposed development rather than one of the district's major centres, will provide significantly greater difficulties than those presently experienced.

1.14 Planning and implementing a sustainable transport strategy in line the LPA's requirements will present a difficult challenge for any future developer with the delivery of the site.

**Q6) 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 nor exacerbating existing areas of flooding. How will this be achieved?**

1.15 CH notes that a significant proportion of the southern end of the phase 1 site falls within Flood Zone 3, due to the proposed allocations setting alongside the Severn Estuary. As with the transport strategy, it will inevitably require a more detailed and higher quality landscaping and drainage scheme to meet these requirements delaying the feasible timeframe for delivery of the proposals.

1.16 CH also draw attention to national policy, and the requirement for a sequential use of land where the floodplain is concerned. CH note that as part of the assessment of the site in the Strategic Flood Risk Assessment [EXAM EB54ii], a considerable amount of the site is regarded in the present functional floodplain. Whilst it may well be that a sequential approach to a design can be taken here, it remains clear that a large part of the site will be sterilised from development, and it is unclear how the proposal can be developed in a sustainable way. There is also a broader point here relating to site selection.

1.17 Given a considerable area of the site falls within the functional flood plain, CH would have expected to see a clearer explanation of why the Council could not turn to any other locations at a lesser flood risk, in accordance with the sequential test. This clear requirement of national policy does not appear to have been satisfied.

**Q18) Will HSE consultation on the minimum distance for ammonium nitrate storage at Sharpness Docks impact upon the allocation?**

1.18 The proposed site falls with a degree of proximity to a lower tier COMAH regulated establishment for the production and storage of fertilizer. CH believe this will provide a significant barrier to initial development based on the methodology provided by the HSE<sup>3</sup>.

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<sup>2</sup> <https://www.stroudnewsandjournal.co.uk/news/15434311.plans-to-bring-vital-investment-to-district-by-extending-platform-at-stonehouse-rail-station-met-with-approval/>

<sup>3</sup> <https://www.hse.gov.uk/landuseplanning/methodology.htm>

1.19 CH do not authoritatively seek to claim that this will impact the overall viability of the proposals, this falls within the technical knowledge of HSE themselves, however it is undoubted that this again will impact the timescale by which the application can progress.

**Q20) Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic**

1.20 As indicated above, CH considers that the delivery rates in the plan are wildly ambitious and expected delivery from the site – of found sound – will be markedly less than purported. In summary, CH are of the view that whilst the site may ultimately be deliverable, there are several clear issues with the timescale for that said delivery of 2,400 homes by 2040;

1.21 Firstly, this is above the average timescale for planning permission to building out.

1.22 Secondly, a key tenant the proposals sustainability, the railway station, does not take into account that it would not be situated on a mainline, and that the council are already looking to increase capacity on said line with an additional station at Stonehouse, with some difficulty

1.23 Thirdly, there is a reasonably high flood risk assessment for a proportion of phase 1 of the site that will take significant landscaping to resolve. Especially given the likelihood of an incrementally increasing climate risk in the lifetime of the plan.

1.24 Finally, the presence of ammonium storage is at present an unknown factor that has the potential to serious delay if not ultimately derail proposals.

1.25 Therefore, given the above, CH emphasis the need for additional traditional and clearly deliverable small-medium scale sites in the plan.

**PS37 Wisloe New Settlement**

**Q22) Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities?**

1.26 A key element of the garden city ethos detailed in SDLPR (CD1.p31) is that development in line with Garden City principles offer residents contact with a “a wide range of local jobs in the garden city within easy commuting distance of homes”. Given the location of the Wisloe proposals to a tier one settlement in the district, and the A38 primary trunk road which provides easy access to Stroud and Gloucester, as well as existing infrastructure networks, it is more in line with overall vision outlined.

1.27 CH believe it is vital that that the SDLPR places development in locations that support that sustainability of existing settlements and infrastructure, located with proximity and access to the key centres of the district. Notably the proposals at Wisloe benefit from an existing rail link to Bristol and Gloucester through Cam and Dursley station.

**Q28) In relation to general site layout/master planning:**

**c)How will landscaping and layout address any visual impacts from the site’s development?**

1.28 CH note that the site will have an impact on the setting of the Cotswold Area of Outstanding Natural Beauty, given that there will be clear view of the development from the Cotswold Escarpment especially when viewed from Stinchcombe to the South East.

1.29 Landscaping and a sensitively designed layout can, of course, meet the demands to limit the impact on the setting of the AONB however it should be noted that this has been given as a justified reason for the ruling out of other sites from the plan.

**Q34) Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?**

1.30 To refer once more to methodology offered by Lichfields<sup>4</sup>, on average given the size of the primary allocation for Wisloe, it would take 7 years for the validation of the application to the completion of the first dwellings, whilst it would likely take 12.5 years for the site to be fully built out at an average rate of 120dpa.

1.31 Taken in isolation, this would not be problematic, but to have 89% of dwellings (as outlined in paragraph 1.5) developed in this manner, with an extended timescale for delivery cannot be considered sufficient to meet the housing need of the district in the short term.

1.32 Of the two proposed sites, the allocation at Wisloe would ultimately have less wider issues in terms of its viability, despite being the smaller allocation of the two. However, it reveals a wider problematic feature of the plan seen elsewhere with development at Hardwicke and Sharpness. The choice by the LPA to position a considerable proportion of its allocated sites away from the key service centres of the district where, inevitably a greater desire for housing exists within the categorisation of the need for settlements such as Stroud, Stonehouse and Cam and Dursley.

1.33 Therefore, CH emphasize that there should be a greater volume of short-medium term deliverable sites included in the plan to allow more of the district's housing requirement to be met whilst the timescale for delivery is carried out. These sites should be located at existing sustainable settlements with strong access to tier one towns.

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<sup>4</sup> <https://lichfields.uk/content/insights/start-to-finish>