



1. The purpose of this Paper is to set out SevenHomes's position in respect of Matter 1

**Context**

2. Its position is that it is the promoter of Local Plan allocation PS44, land at Whitminster Lane, Frampton on Severn. In general terms, it is broadly supportive of the Local Plan and the allocation of its site but has a series of concerns about the Plan in terms of the treatment of the site through the process and the way the allocation was made.

**Issue 1.2 Question 3**

3. PS44 is a housing allocation for 30 dwellings. In terms of reasonable alternatives, it is SevenHomes's position, that the SA has not considered the 'likely significant effects' of reasonable alternatives where they exist. It is the company's position there is a reasonable alternative for the site in terms of increasing the number of units and the extent of the site area, which has not been properly assessed in the SA. In terms of the purpose of reasonable alternative testing in the SA process, paragraph 001 of the PPG sets out that:

*"It can be used to test the evidence underpinning the plan and help demonstrate how the tests of soundness have been met."*

4. In testing the Plan, the SA at paragraphs 2.42 to 2.45 (including bullet points) sets out a series of limitations to the SA process, where areas of uncertainty are highlighted. Crucially, on page 18, the Landscape Assessment for Gloucestershire Strategic Development Opportunities does not cover all of Stroud District. Indeed, it does not consider the allocation. Instead, the SA makes use of the SALA to inform its conclusion on the site, without interrogating that evidence by way of looking at reasonable alternatives for it. This is evidenced in the Site Assessment in Appendix 4 Page 792 to 794. Under heading SA8 Landscape/Townscapes, the justification text notes that

*"The policy requirements may potentially limit impacts in terms of the local landscape setting: however, impacts will be dependent on the specific design of development, which is unknown at this stage."*

5. This highlights SevenHomes's concerns in that it shows that the full potential of the site is not known. As a result, it cannot draw the conclusion as to whether the alternatives for



the site have been properly assessed. The lack of analysis on this is concerning given that the totality of the site under control of SevenHomes is situated in an area of only medium landscape sensitivity and that there is no justification to support a lower level of development, as proposed in the Plan, when compared to the SHLAA conclusions.

**Issue 1.2 Question 4**

6. It is clear from the SA that there has been some assessment of the historic environment issue, but this has not been properly undertaken.
7. In assessing allocation PS44, reference is made to Table A9.2, which provides an audit trail of the site's progress through the Local Plan process. The starting point at the early Regulation 18 stage was that it was identified as one of a series of locations where growth could take place, although this was discounted. The SA goes on to document that at the Reg 19 stage the site was allocated for development but instead of the whole site being allocated, it was only partially allocated for the following reason for the need to protect:

*"Rural setting of the industrial Heritage Conservation Area"*

8. Given the purpose of the SA, it should follow that there is the assessment of the evidence base to support such a position. Unfortunately, this is not the case. As part of the company's promotion of the site, it has submitted a planning application for housing development for up to 80 dwellings under reference S.22/0285/OUT. In the consultation responses to the application, the Conservation Officer notes that the development of the whole site (FR004) is

*"Unlikely to cause any harm to the character of the conservation area."*

9. This response undermines the reporting and testing of the site through the SA process as the basis for a reduced allocation (i.e., protecting heritage assets) has been immediately found to not be a concern in the Conservation Officer's view. Therefore, there is a need to revisit the SA conclusions in terms of the heritage impact from "minor negative" to negligible effect likely, given the lack of any recognised heritage impact.

# STROUD DISTRICT LOCAL PLAN EiP

## Submission on behalf of SevenHomes

### Matter 1

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10. Although this is documented at Appendix 8 of CD3b, it is by its own admission, at a high level and not focused on the detail of each “local level” allocation.

#### **Issue 1.2 Question 13**

11. SevenHomes’s position is that the Plan uses the incorrect terminology to describe Strategic Policies, by making reference to Core Policies and Delivery Policies. This confusion reflects a wider problem with the Plan that the way housing sites are identified and scheduled in plan is difficult to understand and requires the knitting together of several policy points across the plan, to build a precise picture of what is going on.
12. In terms of addressing this issue, Core Policy 2 should be clearly identified as a strategic policy given that it sets out what the housing target is in the plan, along with the scale of growth at various locations.