

# STROUD DISTRICT LOCAL PLAN EiP

## Submission on behalf of SevenHomes

### Matter 6G Local Sites Allocation Policy PS44

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1. The purpose of this Paper is to set out SevenHomes's position in respect of Matter 6G, PS44 Land Northwest of Whitminster Lane, Frampton on Severn.
2. In terms of context, SevenHomes controls the site and has duly made representations submitted at the Regulation 19 Stage of the Plan clearly supporting the principle of allocating the site for residential development. However, SevenHomes's aspirations for the site seek a higher level of development on the site and an increase in the site allocation area to encompass the whole of the field in which the current allocation sits. As part of other submissions, the case has been clearly made that the evidence base does not support the limited quantum of development nor the extent of the allocation proposed. These submissions have been equally supported by a Promotion Document (submitted at Regulation 19 Stage) showing how a larger allocation can be supported.
3. In addition to the material submitted at the Regulation 19 stage, the site is also the subject of an outline planning application for up to 80 dwellings, the reference for this application is S.22/0285/OUT and is currently in for determination with Stroud District Council. This submission is supported by the following documents:
  - Planning Statement
  - Design and Access Statement
  - Flood Risk Assessment
  - Heritage Statement
  - Landscape and Visual Impact Assessment
  - Sustainable Drainage Strategy
  - Transport Statement
  - Travel Plan
  - Waste Minimisation Statement
  - Energy Statement

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- Ecological Impact Assessment
  - Statement of Community Involvement
4. In terms of Plans the following was submitted:
- Site Location Plan
  - Site Layout Drawing (**copy attached**)
  - Indicative Street Scenes
5. The purpose of highlighting this material is to provide the Inspectors with a comprehensive narrative for what material exists to support a wider development of the site, as mirrored in the Site Promotion Document submitted at the Regulation 19 Stage.

#### **Question 45A**

6. Despite the planning application being in for over 12 months, no consultation responses have been received vis-à-vis the level of open space provision to be provided on site and how that provision interfaces with biodiversity net gain requirements. In terms of the level of the level of open space to be provided, this can be determined through the requirements of Policy DCH7 and based on a 30 unit scheme, the open space requirements are as follows (assuming 2.6 persons per dwelling). This is shown on the Table 1 (for 30 units) and Table 2 for a 80 unit scheme. It shows that a 30 unit scheme would generate
- A 30-unit scheme generates 0.31ha of open space on site (as per the typology)
  - A 80-unit scheme generates 0.8ha of open space on site (as per the typology)

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**Table 1 – 30 Unit Requirement**

Typology	DCH7 Standard per 1000 population	Value	Frampton Multiplier	Open Space Requirement
Allotments	0.35ha	0.35	0.08	0.03
Community Orchards	0.15ha	0.15	0.08	0.01
Amenity Green Space	0.40ha	0.4	0.08	0.03
Parks and Recreation	1.20ha	1.2	0.08	0.09
Children’s Play Space	0.06ha	0.06	0.08	0.00
Youth Play Space	0.06ha	0.06	0.08	0.00
Natural Green Space	1.0ha	1	0.08	0.08
Playing / Sports Pitches	0.7ha	0.7	0.08	0.05
<b>Total Open Space</b>	<b>3.92ha</b>	<b>3.92</b>		<b>0.31</b>

**Table 2 – 80 Unit Requirement**

Typology	DCH7 Standard per 1000 population	Value	Frampton Multiplier	Open Space Requirement
Allotments	0.35ha/	0.35	0.21	0.07
Community Orchards	0.15ha	0.15	0.21	0.03
Amenity Green Space	0.40ha	0.4	0.21	0.08
Parks and Recreation	1.20ha	1.2	0.21	0.25
Children’s Play Space	0.06ha	0.06	0.21	0.01
Youth Play Space	0.06ha	0.06	0.21	0.01
Natural Green Space	1.0ha	1	0.21	0.21
Playing / Sports Pitches	0.7ha	0.7	0.21	0.15
<b>Total Open Space</b>	<b>3.92ha/1000</b>	<b>3.92</b>		<b>0.82</b>

**Question 45B**

7. In terms of the three issues listed in the Policy, the attached masterplan shows how an 80-unit site can be developed to:
  
8. Incorporate a public right of way into the site – it shows how the PROW can pull pedestrian traffic into the site off Whitminster Lane. A similar principle can apply to a 30 unit scheme.

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9. In terms of addressing the Gloucester and Sharpness Canal - the proposed development of the site would look to provide a positive frontage onto the Canal, with views filtered by existing and reinforced boundary planting on the northern boundary of the site. As can be seen from the masterplan, space will be provided for an attenuation basis, which will need to be located in this area, irrespective of the total number of units allocated. In terms of the acceptability of this approach, the Conservation Officer, commenting on the Application, has no objection and notes:

*"The above site is situated adjacent to the Frampton on Severn and Saul Conservation Areas. Special attention must be paid to the desirability of preserving or enhancing the character and appearance of the area.*

*This proposal is for the erection of up to 80 dwellings on land at Whitminster Lane. The land is separated from the Saul conservation area by the canal and from the Frampton conservation area by a modern housing development. Therefore, the visual impact on either area will be limited. The proposal is unlikely to cause any harm to the character of the conservation areas. The application has been assessed in accordance with Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990."*

10. Finally, in providing a high quality edge to Frampton on Severn - the proposed layout shows how the allocation of the wider site can achieve this. To date, no objections from the Council have been raised against this policy objective. In addition, from the masterplan, the presence of the powerlines and offset for bat corridors have been taken into account, showing where development can and cannot take place.
11. In terms of the justification of these design influences, these are recognised by SevenHomes as constraints which need to be accommodated in the development of the site. The application material and consultation responses shows that there is no issue in accommodating these requirements in development proposals.

#### **Question 45C**

12. In terms of the concerns raised about the development of the site, responses are as follows:
13. Principle of Development - Frampton is a Tier 3A settlement in Policy CP3 of the Local Plan. EIP Document EB72 clearly identifies issues with the village in terms of historic levels

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of growth, economic performance and the affordability of housing. This provides a suitable narrative that additional housing should be provided at the village.

14. Site Access – along with The Parish Council and other responders, the policy requires access via Oatfield Drive, through a communal parking area for existing housing. SevenHomes considers this to be wholly unsuitable and proposes an access point on Whitminster Lane and the TA supporting the application shows how safe access can be achieved in accordance with Manual for Streets and speed survey data provided by SevenHomes’s highways consultant. This access point is not objected to by County Highways and further discussions are on-going about the enhancement of bus stops.
15. Ecology – Supporting Ecological Impact Assessment shows that ecological interests can be accommodated in the site. In terms of the 10% BNG requirement, initial assessments undertaken by SevenHomes shows how this can be accommodated in a site of 80 dwellings. In terms of a site of 30 dwellings, there is some uncertainty as to whether this can be achieved, without requiring additional land outside of the allocation. It should be noted that the Gloucestershire Wildlife Trust has no initial concerns with the proposed development.
16. Drainage – discussions are currently ongoing with the LLFA about the detailed drainage solution for the site. At this stage, there is no objection to the development of the site from a drainage standpoint for an 80-unit scheme. The same can be equally applicable to a 30-unit development.
17. Power Lines – there are no proposals to divert or place the powerlines underground. As part of understanding the on-site constraints, the retention of the power lines has been fully explored including the need to maintain safety clearances. These are annotated on the attached masterplan as well as in the Promotion Document. Western Power Distribution has confirmed that it has no objection to the development provided that specific safety clearances are observed.
18. Coalescence of Frampton on Severn with Oatfield – the point has been made in other submissions and contrary to the Council’s response in SLP-01a, there is no evidence that Oatfield is recognised by the Council in its evidence base as a settlement in its own right, or what the historic value of Oatfield is. In addition, in conjunction with other submissions, it has been shown that the Council consider the “Oatfield” area to be part of Frampton on Severn. In addition, page 14, of the Heritage Statement clearly shows the evolution of

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Frampton on Severn between 1922 and 1975. Simply put in 1922 there were only three houses in Oatfield, which subsequently grew in the intervening period and therefore, has no historical significance.

19. Loss of Open Space – it is noted that the site is identified as open space as part of the Frampton Design Statement. However, contrary to the Design Statement, the allocation of the wider field parcel does not serve any open space function. and is not available for public recreation as it is an agricultural field with a footpath running across it. In designing a scheme for the site SevenHomes are conscious of maintaining the footpath and some visual relief and the footpath maintains an open setting on the western half of the field parcel.
  
20. In dealing with the friction between the Design Statement and the emerging Local Plan, it has to be recognised that the Design Statement is not a Neighbourhood Plan and cannot have the same weight afforded to it as a Neighbourhood Plan. Furthermore, it has not been adopted by the Council as Supplementary Planning Guidance. As a result, the emerging Local Plan’s strategy can outweigh the requirements of the Design Statement. That said, SevenHomes is conscious and sensitive to the contents of the document.