

REPRESENTATIONS ON THE STROUD EMERGING STRATEGY PAPER

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**Representations on the
Stroud Emerging Strategy Paper**

Barton Willmore
Greyfriars House
Greyfriars Road
Cardiff
CF10 3AL

Tel: 02920 660 910

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Email: cardiff@bartonwillmore.co.uk

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1.0 INTRODUCTION

- 1.1 These representations are submitted by Barton Willmore in respect of the Stroud Emerging Strategy Paper (ESP) in respect of land at Whitminster.
- 1.2 Chapter 2 provides further evidence on the sustainability of land at Whitminster, and comments are made on the emerging issues, vision and strategic objectives of the ESP; and growth strategy and allocations, in Chapters 3 and 4 respectively. A conclusion is provided in Chapter 5.

2.0 WHITMINSTER

Whitminster: sustainable settlement

2.1 The ESP classifies Whitminster as a tier 3a¹ settlement, described as follows:

“These medium-sized and large settlements are generally well-connected and accessible places, which benefit from their proximity to higher order settlements and / or good transport routes.... These settlements generally lack any “strategic” role or function but they all provide a good range of local services and facilities for the community” (ESP, page 40).

2.2 The Stroud District Council Settlement Role and Function Study (2014) is being updated but the update is not currently available as part of the ESP consultation. Nevertheless, the 2014 study is still relatively current and illuminates the sustainable attributes of Whitminster. Some of the Key findings in respect of Whitminster are summarised below.

Public Transport and Accessibility

2.3 Whitminster benefits from being located on the A38 corridor and therefore includes a number of bus stops, which provide for a range of regular service provision. This includes the following services:

- 2 - Arlingham - Saul - Frampton - Whitminster - Epney - Severnvale School;
- 6 - Arlingham - Frampton - Eastington - The Stanleys - Maidenhill School;
- 60 - Gloucester - Dursley - Wotton-under-Edge - Thornbury – Bristol;
- 72SV - Severnvale Shopper;
- 167 - Quedgeley - Nymphsfield - Dursley Rednock School;
- 242 - Arlingham - Stonehouse – Stroud;
- 346 - Saul - Frampton on Severn - Eastington - Rednock School Grounds;
- 401A - Epney - Leonard Stanley - King's Stanley - Stroud High & Marling Schools;
and
- PA1 - Whitminster - Quedgeley - Abbeymead - Sir Thomas Rich's & Pate's Grammar Schools.

¹ Tier 1 are the largest settlements in the District (i.e. Stroud, Cam, Dursley and Stonehouse); tier 2 are relatively large settlements some of which have a strategic role serving a district wide / wider-than-local catchment (Berkley, Minchinhampton, Nailsworth, Painswick and Wotton-under Edge). Tier 3a settlements include Brimscombe and Thrupp; Chalford; Eastington; Frampton-on-Severn; Hardwicke; Kings Stanley; Kingswood; Leonard Stanley; Manor Village; Newtown and Sharpness; North Woodchester; and Whitminster.

2.4 Public transport provision should evolve over the plan period with enhancements to bus services required to align with committed and proposed development. The A38 corridor (wherein Whitminster is located) represents a significant opportunity for further development that can align with enhanced service provision. Further development in this location can help facilitate and enable further service provision through increased patronage and contributing to the critical mass required to ensure enhanced bus services are deliverable.

Community services and facilities

2.5 Table 15 (page 53) of the Stroud District Settlement Role and Function Study (2014) indicates that Whitminster has a Local Service Provision Score of 3 putting it on par with Stroud, which comprises a Tier 1 settlement.

2.6 Table 16 (page 55) states that Whitminster has 4 of the 5 local facilities, including:

- Post Office
- Community hall
- Children's play area / sports field
- Primary school

2.7 However, we note that in addition to the services and facilities surveyed, Whitminster also has a pub with the Church of St Andrew, Whitminster also used by residents of the village.

Table 16: Level of community services and facilities provided by each settlement

Settlements in the Hierarchy (CP3)	"Strategic" facilities *						"Local" facilities *					Strategic service provision score	Local service provision score
	Bank / building society	Hospital	Secondary school	Library (in a building)	Sports centre or swimming pool	Railway station	Post Office	Community Hall	Children's play area or sports field	Primary school or nursery	Doctor's surgery		
Stroud	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	6	5
Stroud (Redborough)	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	6	5
Stroud (Cainscross)	✗	✗	✓	✗	✗	✗	✓	✓	✓	✓	✗	4	5
Stonehouse	✓	✗	✗	✓	✗	✓	✓	✓	✓	✓	✓	4	5
Cam	✗	✗	✗	✗	✗	✓	✓	✓	✓	✓	✓	1	5
Dursley	✓	✓	✓	✓	✓	✗	✓	✓	✓	✓	✓	5	5
Berkeley	✓	✗	✗	✓	✗	✗	✓	✓	✓	✓	✓	2	5
Wotton Under Edge	✓	✗	✓	✓	✓	✗	✓	✓	✓	✓	✓	4	5
Nailsworth	✓	✗	✗	✓	✓	✗	✓	✓	✓	✓	✓	3	5
Mirchinghampton	✗	✗	✗	✓	✗	✗	✓	✓	✓	✓	✓	1	5
Frampton on Severn	✗	✗	✗	✓	✗	✗	✓	✓	✓	✓	✓	1	5
Amberley	✗	✗	✗	✗	✗	✗	✓	✓	✗	✓	✗	0	3
Bisley	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Brimcombe	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Chalford	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	3
Coaley	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	3
Eastington	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Hardwicke	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Horsley	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	0	3
Kingswood	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Kings Stanley	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Leonard Stanley	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	0	3
Manor Village	✗	✗	✓	✗	✗	✗	✗	✗	✓	✓	✓	1	3
Newtown & Sharpness	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
North Nibley	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
North Woodchester	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Oakridge Lynch	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Painswick	✗	✗	✗	✓	✓	✗	✓	✓	✓	✓	✓	2	5
Slimbridge	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4
Uley	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	0	4
Upton St Leonards	✗	✗	✗	✗	✓	✗	✓	✓	✓	✓	✗	1	4
Whiteshill & Buscombe	✗	✗	✗	✗	✗	✗	✗	✓	✓	✓	✗	0	3
Whitminster	✗	✗	✗	✗	✗	✗	✓	✓	✓	✓	✗	0	4

* Source: Stroud District Rural Settlement Classification Topic Paper (Update 2012)

2.8 For strategic facilities, Whitminster lies within proximity Frampton on Severn (which includes a library) and to Stonehouse which includes all strategic facilities with the exception of a hospital and a swimming pool. The 2018 Settlement Study update needs to reflect this in its review of services and facilities for Whitminster.

Employment and travel to work

2.9 Table 17 of the Settlement Study (2014) shows Whitminster has a strong employment role. Whitminster has a working age population of 490 people, compared with 690 jobs

available within the settlement, thus showing that Whitminster is an employment hub and net importer of employees.

Table 7: Settlements with a strong employment role (Census 2011)

Settlements in the Hierarchy (CP3)	Local workers: Resident population (aged 16-74): number of economically active residents (March 2011) *	Local jobs: Workplace population (aged 16-74): Number of people at work in each settlement (March 2011) *	Settlements in the Hierarchy (CP3)	Is the settlement a net importer or exporter of workers? *	"Employment density" (available local jobs/available resident workers)
Stroud District Totals / Average :	59,980	50,092	Stroud District Totals / Average :	-9,888	0.84
Stroud	13,900	11,720	Stonehouse	+ 3,130	1.75
Stonehouse	4,150	7,280	Kingswood	+ 460	1.63
Dursley	3,510	2,420	Whitminster	+ 200	1.41
Nailsworth	3,060	2,380	North Woodchester	+ 120	1.39
Cam	4,180	1,980	Amberley	+ 100	1.38
Wotton Under Edge	2,590	1,370	Eastington	+ 50	1.06
Minchinhampton	1,530	1,350	Brimscombe	+ 70	1.06
Brimscombe	1,270	1,340	Frampton on Severn	+ 30	1.04
Hardwicke	2,400	1,240	Slimbridge	0	1.00
Kingswood	730	1,190	Upton St Leonards	- 10	0.98
Eastington	860	910	Minchinhampton	-180	0.88
Painswick	1,040	850	Stroud	-2,180	0.84
Chalford	1,500	840	Painswick	-190	0.82
Frampton on Severn	800	830	Deeridge Lynch	-70	0.82
Berkeley	1,120	810	Bisley	-50	0.81
Whitminster	490	690	Nailsworth	-680	0.78
Upton St Leonards	510	600	North Nibley	-70	0.75
Manor Village	1,590	580	Berkeley	-310	0.72
Newtown & Sharpness	780	510	Dursley	-1,090	0.69
North Woodchester	310	430	Newtown & Sharpness	-270	0.65
Slimbridge	410	410	Horsley	-80	0.62
Amberley	260	360	Chalford	-660	0.56
Kings Stanley	810	340	Uley	-260	0.56
Jley	590	330	Wotton Under Edge	-1,220	0.53
Bisley	380	310	Hardwicke	-1,170	0.51
Leonard Stanley	750	310	Craley	-170	0.48
Whiteshill & Ruscombe	530	240	Cam	-2,200	0.47
Deeridge Lynch	270	220	Leonard Stanley	-170	0.42
North Nibley	280	210	Kings Stanley	-440	0.41
Coaley	330	160	Whiteshill & Ruscombe	-390	0.38
Horsley	210	130	Manor Village	-1,010	0.36

2.10 Workers in the Frampton on Severn / Eastington / Slimbridge / Whitminster cluster on average travel 19.2km to work which is very similar to the other clusters which range from an average of 17.2 – 23.5 km (with the exception of Hardwicke/Upton St Leonards/Hunts Grove which averages 15.3km). This compares with average distance travelled to work of circa 12.5 – 17 kms for the largest settlements of Stroud, Stonehouse, Cam and Dursley.

- 2.11 Whitminster additionally has a relatively high rate of economic activity with Para. 3.1.5 stating:

"Whitminster is an exception. Despite its relatively small population, it has an above-average rate of economic activity (76%), above-average rates of employment, and a below-average proportion of retired people amongst its economically inactive population."

Strategic Assessment of Land Availability

- 2.12 The Stroud Strategic Assessment of Land Availability (SALA) prepared in 2017 and updated in 2018 has carried out an assessment of potential development sites around Whitminster. The sites are shown on page 86 of the ESP, several are concluded in the SALA as having 'future potential', whilst other SALA sites were discounted due to perceived landscape impacts.
- 2.13 The Stroud Landscape Sensitivity Assessment (2016) that fed into the SALA has been undertaken on a broad basis and does not take account of any specific development proposal. Consequently, the conclusions do not consider the potential design and mitigation approaches that can be achieved to assimilate built development into the landscape.
- 2.14 Notwithstanding the above, unlike other settlements (and areas surrounding them), Whitminster is not within, or within proximity of, the Cotswold AONB. It should also be noted that the Emerging Strategy Paper identifies that *"The preferred directions of housing growth in landscape terms are to the northeast and northwest"* indicating that there is potential capacity for development in these locations from a landscape perspective (subject to further assessment).

Summary

- 2.15 Overall, Whitminster has good accessibility to local services and facilities (primary school, post office, community hall, and children's play space/playing pitch – plus a pub, church and a local shop). This needs to be reflected in the Settlement Study update 2018. The settlement has good access to a variety of employment close by, and has a jobs surplus, acting as an employment hub. Whitminster's location on the A38 corridor should be recognised and the opportunity for development here to capitalize on and support enhanced public transport provision should be harnessed.

- 2.16 In response to question 4.3a, Whitminster should have tier 2 status cognisant of the range of facilities it includes along with its location on the A38 corridor. Land at Whitminster is suitable for residential development and accordingly sites should be allocated within the Local Plan – which would provide the settlement with a greater critical mass and capitalise on the location’s sustainability credentials.
- 2.17 Accordingly, in response to question 4.2c and 4.2e, we consider that Whitminster and the A38 corridor should be identified as a village suitable for growth

3.0 EMERGING STRATEGY PAPER – ISSUES, VISION AND OBJECTIVES

Issues

3.1 The Emerging Strategy Paper (ESP) identifies 5 key issues focusing on:

- Housing in the right locations
- Conserving the countryside
- Maximising brownfield redevelopment
- Avoiding and mitigating impacts of development
- Tackling the lack of affordable housing

3.2 These are high level but prove to be very significant as the Council then goes on to identify what they will do about them on Page 7 of the ESP.

3.3 We note that Page 7's further explanation of the issues to be addressed by the plan makes no provision for villages / smaller settlements. Issue one (housing) indirectly deals with the larger settlements (i.e. tiers 1 and 2) and concentrating new development in these locations with greatest accessibility and infrastructure (as referred to in the first bullet point); and new settlements in the second bullet but there is no recognition of the needs and roles of villages which make up a large proportion of the district's settlements in any of the issues. The remaining 4 issues deal with affordable housing, land recycling and environmental protection (i.e. conserving the countryside and avoiding/mitigating the effects on the natural environment).

3.4 Therefore, in response to questions 1.0a and 1.0b, a bullet point should be added under issue 1 as follows:

- Support the needs and sustainable growth of smaller settlements (tiers 2 and 3), particularly those that are well served by employment and other services or where they form part of a cluster of settlements providing for the needs of a wider area.

Vision

3.5 In response to question 3.1a and 3.1b, we would note that the vision focuses on the key market towns but overlooks the villages where a large proportion of the district's population lives. The vision should therefore be amended to include something suitably visionary and supportive of the future of villages, particularly those which provide key services and employment to those living within the village itself and surrounding villages.

Strategic objectives

3.6 Strategic objective SO3 deals with town centres and rural hinterlands but this should be extended to also refer to key villages providing vital services in rural areas. In response to question 3.1b, we would note that this is probably best located under SO1: Accessible Communities, with the addition of this as a final bullet point:

- Supporting villages providing vital services and employment in rural areas.

4.0 GROWTH STRATEGY OPTIONS

Growth strategy

4.1 Four growth options were set out at the Issues and Options stage as follows:

- Option 1 – concentrated development at the district’s main towns;
- Option 2 – wider distribution of housing and employment at the edge of larger villages and main towns;
- Option 3 – Dispersal of development so that most villages had at least one small-medium sized site;
- Option 4 – growth point (i.e. new settlements).

4.2 Growth option 2 ‘wider distribution’ indicated 220 homes and Option 3 indicated 140 homes being distributed to the Severn Vale cluster (wherein Whitminster is located).

4.3 The ESP has now set out a preferred strategy which:

- concentrates growth at Cam and Dursley, Stonehouse, and Stroud;
- identifies 2 new settlements at Sharpness and Wisloe;
- directs modest growth to local service centres;
- directs a very small amount of growth to villages with good local facilities, which does not include any development at Whitminster.

4.4 However, as currently presented, its difficult to assess the overall performance of the strategy in any detail as no settlement housing targets are provided on the key diagram on page 33 (or in a summary table) setting out the scale of growth anticipated for settlements. Information is provided in chapter 5 (Making Places) on the number and scale of housing and employment allocations, but it would be helpful to have a strategic overview of the overall scale of change (i.e. existing commitments plus new allocations) for those settlements that will be accommodating growth in the district (i.e. tier 1 – 3 settlements).

Site allocations

Whitminster

- 4.5 The ESP does not intend to direct any residential development to Whitminster over the next 20 years to 2040. This does not reflect the sustainable role it plays in the settlement hierarchy, particularly when viewed as part of its wider context and relationship with Stonehouse (with an extensive range of services and facilities). With decreasing household size, the proposed strategy for Whitminster (i.e., no additional housing development other than small scale infill / redevelopment) could lead to population decline. Whitminster is a sustainable settlement on its own merits and should include additional development to serve its housing needs, currently unaddressed in the ESP.

Summary

- 4.6 Whilst we generally support the principle of a 'hybrid' strategy, the strategy as currently drafted is too concentrated on the larger towns and new settlements. Housing allocations should accordingly be identified at Whitminster.

5.0 CONCLUSION

- 5.1 Overall, Whitminster has good accessibility to local services and facilities (primary school, post office, community hall, and children’s play space/playing pitch – plus a pub, church and a local shop). This needs to be reflected in the Settlement Study update 2018. It also has good access to a variety of employment close by, and has a jobs surplus, acting as an employment hub.
- 5.2 Whitminster is currently a sustainable location for growth and should have tier 2 status. Land at Whitminster is suitable for residential development and accordingly sites should be allocated within the Local Plan. Notwithstanding, public transport provision should evolve over the plan period with enhancements to bus services required to align with committed and proposed development. The A38 corridor (wherein Whitminster is located) represents a significant opportunity for further development that can align with enhanced service provision. Further development in this location can help facilitate and enable further service provision through increased patronage and contributing to the critical mass required to ensure enhanced bus services are deliverable.
- 5.3 The ESP’s issues, vision and strategic objectives have overlooked the needs of the villages, especially those well served by services and facilities (tier 2 and 3 settlements) which provide vital services for those living within the settlement and beyond. This needs to be addressed in the next stage of the Plan.
- 5.4 Whilst we generally support the principle of a ‘hybrid’ strategy, the strategy as currently drafted is too concentrated on the larger towns and new settlements. Housing allocations should accordingly be identified at Whitminster.

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