

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

STROUD DISTRICT LOCAL PLAN REVIEW – FOCUSED CONSULTATION ON ADDITIONAL HOUSING OPTIONS

SUBMISSIONS ON BEHALF OF

<u>CONCERNING LAND NORTH-WEST OF WHITMINSTER LANE, FRAMPTON ON</u>
<u>SEVERN (Allocation PS44 on pages 128 – 129 of the Plan)</u>



PREPARED BY

1.0 FOCUSED CONSULTATION – RESPONSES OF LANDOWNERS WITH SPECIFIC REGARD TO FRAMPTON ON SEVERN (Allocation PS44 on pages 128 – 129 of the Plan)

Background

- 1.1 The Landowners welcome the opportunity to respond to the Additional Housing Options focused consultation document issued in October 2020.
- 1.2 The Draft Plan includes an allocation PS44 'comprising 30 dwellings and associated community and open space use' on land north-west of Whitminster Lane. It would represent a small scale and limited growth of the large village of Frampton on Severn, which has a good range of services and facilities.
- 1.3 The Landowners submitted representations in respect of the Draft Plan (document dated 20 January 2020). These submissions confirmed the support for the Draft Plan's strategy, with particular regard to its identification of land north-west of Whitminster Lane for a limited expansion of the village under PS44. Our submissions set out that it will help address the past low growth rate in Frampton on Severn, and deliver a range of new homes, including affordable housing and market homes. This will help meet the needs of young families and smaller households in a sustainable location.
- 1.4 The January 2020 submissions also explained that the Landowners' local knowledge and engagement has identified a number of opportunities for community and open space uses which can be directly facilitated by the development. Specifically, these would include land for an additional tennis court; access and parking for the tennis club; land for the doctor's surgery to create a public memorial garden (delivered via an established charitable trust); and new areas of public open space, enlarging the existing recreation ground.
- 1.5 However, our representations did question whether the draft policy's approach to the quantum of development was unduly prescriptive, i.e. '30 dwellings'. Whilst recognising that the Plan needs to include figures to demonstrate that the overall housing requirement will be met, we felt that a less prescriptive wording was appropriate on this particular site, given its size, characteristics and opportunities.

<u>Focused consultation – additional housing options</u>

- 1.6 We have read and carefully considered the consultation document, which explains that the Council may have to find land for an additional 1,050 2,400 homes in the Plan period to 2040.
- 1.7 In terms of the spatial options, we support a hybrid approach of intensifying the use of existing and allocated sites (Option A) and

promoting more growth within larger villages (Option B). We do not consider that the scale of the additional housing requirement justifies an additional growth point (Option C) or an approach of 'wider dispersal', as these options would be unsustainable, have negative environmental consequences and would represent a major departure from the established strategy.

- 1.8 With specific regard to PS44, we have undertaken a substantial amount of constraints analysis and further work since our January 2020. The landowners are working with an experienced and sensitive prospective developer.
- 1.9 This work has established that 30 dwellings would not make best use of this large site. Our high level masterplanning / capacity analysis indicates that a development of **60 65 units** would be readily achievable. This would not be a 'cramming' exercise and such a development would include all of the identified community open space uses. It would address and respond to the man-made constraint created by the electricity pylons and cables and it would seek to maximise hedgerow and tree retention and enhancement.
- 1.10 It would also include sufficient space and a refined layout design to achieve a complementary relationship with the Gloucester-Sharpness canal, Sandfield Mill, the Industrial Heritage Conservation Area and the small hamlet of Oatfield, which would remain separate and distinct, with a suitable landscaped buffer around. Indeed, the development outlined above could be largely contained within the south-western part of the site (roughly south-west of the existing 33KV electricity line).
- 1.11 This masterplanning exercise is still a 'work in progress' and will form the basis of future local engagement and a pre-application submission. However, if officers would like to meet (virtually) to view the emerging plans to support its evolution of allocation PS44, the Landowners' agent can be contacted to organise this.
- 1.12 Given the need to find more sustainable housing options, we do consider that PS44 could and should play a greater role. Increasing the allocation to 60 65 units would be appropriate and would be pitched at a level that would maximise benefits and new community facilities, whilst not being excessive.
- 1.13 Overall, it would translate as a circa 10% growth¹ in the village's housing numbers in the Plan period to 2040. That seems to be an entirely reasonable and appropriate level of growth for this large village, which has a wide range of services and facilities. It will also help address the historic levels of very low housing growth in the village, meet local housing needs

¹ Based on figures contained in the Stroud District Settlement Role and Function Study Update May 2019

including 30% affordable homes, and contribute to maintaining the village's diversity and demographic vitality.

Conclusion

- 1.14 For the reasons set out above, the Landowners submit that there is a compelling evidence-led case for increasing the PS44 allocation to 60 65 dwellings units (and associated community and open space use). We request that the Planning Strategy Team considers these submissions and makes appropriate modifications to allocation PS44.
- 1.15 Please contact the Landowner's agent officers require any further information or wish to discuss any element of this submission.

11 December 2020