

# Representation Statement Stroud Local Plan

**In respect of:**  
Land at Whitminster Lane  
Frampton on Severn

**On Behalf of:**  
SevenHomes

**By**  
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1. Vision Document



## 1.0 Introduction

- 1.1. Mcloughlin Planning has been instructed by SevenHomes to submit representation on behalf of its land interests at Whitminster Lane, Frampton on Severn (PS44). In terms of this Regulation 19 Consultation, SevenHomes wishes to make a number of representations about the policies contained in the Plan and highlight a number of elements which it has concerns with.
- 1.2. SevenHomes' interests relate to the Whitminster Lane allocation (PS44) and whilst generally supporting this allocation it also has concerns. A site-specific representation is also made as part of the document. With this structure in mind, this document is set out as follows:
  - Section 2 - Responses to individual Policies.
  - Section 3 - Site Specific Representation.
  - Section 4 - Response to Site Specific Policies.



## 2.0 Responses to Individual Policies

- 2.1. This Section of the Statement sets out SevenHomes' concerns with various policies in the Plan.

### **40 Key Issues - Pages 11 to 16**

- 2.2. SevenHomes wish to make the following observations.

### **Affordable Supply (Page 12)**

- 2.3. References are made to tackling an acute lack of affordable housing in the District. SevenHomes supports the provision of affordable housing as part of development schemes and considers that a further key issue of the Plan in this regard is to ensure that sufficient levels of open market housing are provided to facilitate those levels of affordable housing sought in the Plan.

### **Maximising the potential of Brownfield and underused sites**

- 2.4. SevenHomes recognise that National Guidance promotes the use of Brownfield sites as a means of meeting housing land requirements. However, this should not be at the expense of Greenfield development sites. From the housing numbers proposed and the previous Local Plan, the Plan is heavily reliant on Greenfield land to meet its housing requirements. Therefore, whilst the National Planning Policy Framework (NPPF) promotes Brownfield land, this should not be at the expense of preventing Greenfield development sites from coming forward in a timely manner.



### **Issue 18 - Better transport systems to help reduce Co2 emissions**

This issue fails to reflect the reality that Stroud is a predominantly rural district with communities spread throughout and how could a better transport system be achieved when taking this into account as well as the economics of provision. Travel by the private car is an inevitable consequence and characteristic of developing in rural areas. Development in rural settlements (such as Frampton on Severn) can provide excellent opportunities to enable the vitality and viability of rural communities to be saved. Policies expressly limiting car usage are considered unhelpful in this respect.

### **Issue 40 - Mitigation Strategies and Environmental Projects**

- 2.5. The key issue is developing mitigation strategies to fund environmental projects. The concern here is whether this would meet the test in Paragraph 56 of the NPPF in terms of being necessary to make the development acceptable in planning terms.

### **Vision to 2040 (Page 19)**

- 2.6. SevenHomes wish to offer the following commentary with the fourth paragraph. This recognises that the District has a range of diverse communities both large and small, both urban and rural. It also makes reference to the fact that they have a strong sense of identity. What is missing from the Vision is promoting those strong identities and local distinctiveness ensuring their continued viability and vitality by allowing new development.

### **Strategic Objectives for the future (Pages 20 and 21)**

- 2.7. SO1 – The phrasing of the Strategic Objective raises several questions in terms of what constitutes “affordable” and “quality housing for local needs”. The objective whilst laudable, is unclear in terms of; is this referring to affordable housing as defined by the NPPF, or some other type of affordable housing as defined by the Plan but not appropriately justified.
- 2.8. The Objectives could be improved through the inclusion of a new strategic objective (SO1b). The focus of this strategic objective is for the Plan to set out a development strategy which supports existing rural communities and their vibrancy and vitality as required by Paragraph 78 of the NPPF.



- 2.9. Securing Zero Carbon development – SevenHomes questions how this key issue will be achieved and by what metric this will be assessed. Zero Carbon has yet to be fully explained in Government Policy and the use of this terminology raises concerns around how this will be implemented by the council through the policies in the Plan.

### **Policy DCP1 - Delivering Carbon Neutral by 2030**

- 2.10. SevenHomes consider this Policy to be unsound for the following reasons:
- 2.11. What is Zero Carbon – currently, there is no fixed Government definition as to what Zero Carbon is and the concern is that the Plan will apply standards that are simply unachievable or add costs to development which is unnecessary. Further clarification is required on this point.
- Discouraging the use of private car – Stroud is a predominantly rural district with a series of urban areas. Whilst development adjacent to the larger urban areas offers considerable benefits for minimising the need to travel by private car, it remains to be seen how all new developments would be expected to discourage the use of the private car. Such terminology represents an active approach in terms of discouraging the use of the private car and how it would be secured via planning. Furthermore, it is not clear how such an approach would impact on the social and economic wellbeing of future residents of the District. If the Plan wishes to maintain such an approach, further development adjacent to established settlements is critical.
  - SevenHomes support the use and provision of green infrastructure. However, it is not clear as to how all new developments are expected to support “local food production”. There are no prescribed standards in national guidance or in the Local Plan, as to what is expected. Furthermore, there may be instances where the provision of green infrastructure/supporting local food consumption maybe incompatible with carbon sequestration.

### **Core Policy CP2 - Strategic Growth and Development Locations**

- 2.12. In conjunction with other submissions, SevenHomes is concerned that the provision of at least 12,800 new dwellings in the District is unsound in that the target does not reflect national guidance regarding the minimum housing figure proposed in the Standard Method. In addition, out of the Policy, SevenHomes wishes to set out its concerns on the following allocations.



- Cam North-West – 700 dwellings.
- Sharpness Docks – 300 dwellings.
- Sharpness – 2,400 dwellings.
- Wisloe – 1,500 dwellings.

2.13. This equates to 3,720 dwellings to be constructed on significant urban extensions. SevenHomes' concerns with the provision of 3,720 dwellings on 4 urban extension sites are that:

- These are situated within 5 miles of each other.
- There is insufficient evidence presented supporting the ability of the local housing market to absorb the magnitude of development which is being proposed.

2.14. Therefore, there is a question as to whether the Plan is "effective" in that there is no evidence of a delivery timetable for each site, apart from Table 6 on page 306 of the Plan. If there is any delay in the delivery of these sites, this will lead to questions about the overall deliverability of the allocations being provided with the attending concerns on the District not being able to demonstrate a 5-Year Housing Land Supply. Furthermore, the Plan's approach is highly inflexible if there is any failure or delay in the delivery of Wisloe or Sharpness by way of example. There is also no alternative allocation strategy in the Plan to ensure that other sites can come forward of significant magnitude to make up the shortfall in any supply that may occur during the period whilst these strategic sites come on stream.

2.15. A solution to this difficulty is to increase the flexibility on the other allocations being put forward in the Plan, with reference to SevenHomes' interests at Frampton on Severn, the allocation could be increased to a minimum of 60 dwellings, providing a site that can deliver within a 5-year timeframe and reduce the Council's dependency on larger strategic sites.

2.16. A further concern with the Plan is the split between Strategic and Local development sites. The evidence base does not show how this decision has been reached and why it is necessary. For example, the smallest strategic allocation is Cam North East Extension at 180 dwellings. This is only 10 dwellings more than the 2 allocations at Berkley, where the net effect on the settlement will be broadly the same. The separation between strategic and local development sites is unhelpful and unevidenced and should be removed.



### **Core Policy CP3 - Settlement Hierarchy**

- 2.17. SevenHomes support the identification of Frampton on Severn as a Tier 3a location for development. In the Policy however, there is the concern with the following Statement:

*"However, their scope for future growth (in addition to any sites already allocated in this Plan) is constrained."*

- 2.18. This is unsound in its approach, in respect of Frampton on Severn, this is not the case. The allocation for 30 dwellings is considered to conflict with national guidance about making best use of land. SevenHomes' position is that the allocation and number proposed in 3a locations is not the 'last word' on the development potential at the village and that opportunities exist to increase the level of development, without compromising other policy objectives.

### **Core Policy CP4 - Place Making**

- 2.19. SevenHomes support the overall objectives of the Place Making policy. However, any reliance on Supplementary Planning Documents or Design Statements will have to be subject to proper scrutiny to ensure that the controls imposed through those documents meet the requirements of national guidance.
- 2.20. Turning to the master planning and development of sites, the requirements of paragraph 2 of the policy are supported. However, it must be recognised that they are competing influences on the design of sites.

### **Core Policy CP5 - Environmental development principles for strategic sites**

- 2.21. This policy sets out a series of criteria against which proposals will be assessed. As part of the removal of the strategic/local level allocations, the requirements of this policy are encompassed within a series of other policies in the Plan.

### **Core Policy CP6 - Infrastructure and developer contributions**

- 2.22. In responding to the Policy, there is a need to ensure that the requirements of the paragraphs 34 and 56 of the Framework have been met. These paragraphs govern developer contributions, and the Policy refers to the Infrastructure Delivery Plan.





2.23. The need for new infrastructure demands being generated by new development is well understood. However, in seeking contributions towards infrastructure arising from development, there is a need to ensure that they are:

- Necessary.
- Directly Related to the Development.
- Fairly and reasonably related in scale and kind.

2.24. The concern with the IDP is that it sets out multiple infrastructure requirements and is a document which will be “reviewed and updated as circumstances change” (para 2.9.30). The challenge with this document, being outside of the planning process, is that it could lead to infrastructure requirements being demanded from development which do not meet the tests set out above or makes the development unviable. In addition, developer contributions cannot be used to seek contributions to address existing deficiencies infrastructure, but rather only be required to address the impacts arising from the development itself.

2.25. In addition, unlike the strategic sites, the local development sites have not been viability tested. The exact infrastructure requirements for allocation PS44 have yet to be fully tested through the planning process. However, the Infrastructure requirements in the IDP set out the following costs:

- Pre-School £135,819
- Primary School £185,619
- Secondary School £138,522
- Post 16 £76,204
- Healthcare £43,798 (noted IDP considers seeking space on PS44 for medical centre at page 78)
- Sports Facilities (AGP/Halls/Swimming Pool) £27,366
- Community Centre £17,052
- Libraries £9,094

2.26. This equates to a S106 package of £633,474 (£21,115 per unit) as a minimum and excludes public open space typologies and any contributions to off-site highways infrastructure (A38/B4071 junction) or the Perry Way (improvements budgeted at £135,000 in total). This is a significant cost per unit and without viability testing, there



is the concern that such a level of contributions may not be viable, when the wider policy requirements are considered, especially when an allocation of only 30 dwellings is proposed.

- 2.27. The concluding remarks of the IDP is that it should inform the preparation of an Infrastructure Funding Statement so that the shortfalls in funding can be identified and how developer contributions will assist in dealing with those shortfalls. It is essential that the policy is revised to clarify the role of the IDP in the determination of S106 requirements.

### **Core Policy CP8 - New housing development**

- 2.28. Paragraph 31 of the Framework requires that plans should be “underpinned by relevant and up-to-date evidence”, it goes onto require that policies should take account of “market signals”.
- 2.29. In response, the use of a housing assessment is useful in informing housing mix. The concern with the use of such documents is how quickly they age and cease to be relevant. A further complication is if any Parish profile suggests an alternative mix of dwellings. As a result, it is recommended that additional flexibility is inserted into the policy that allows for proposals to “broadly reflect” the housing mix in the needs assessment and allows for the use of market data to ensure viability.
- 2.30. In terms of criteria 1-5 of the policy these are considered unnecessary because they are covered in other policies.

### **Core Policy CP9 - Affordable housing**

- 2.31. The approach in the Policy is unsound in that the Plan identifies an annual unadjusted affordable housing need, which is more than 50% of the Plan’s housing target. Therefore, the Policy cannot deliver enough affordable housing and fails to assist in “significantly boosting the supply of homes” as required by paragraph 59 of the Framework.
- 2.32. This places extra pressure on the Plan to deliver additional housing. In this instance, it provides sufficient basis for supporting an increase in the number of dwellings to be provided on PS44.



### **Delivery Policy HC3 - Self-build and custom-build housing provision**

- 2.33. The requirement in the Plan on all strategic allocations to deliver 2% of the total number of dwellings proposed as self-build or custom build dwellings is considered unsound because it is not considered to be a deliverable requirement. The allocations in the Local Plan set out a series of competing requirements which mean that opportunities for self-build are extremely limited and present more logistical challenges for a developer in terms of:
- Where those self-build plots will be located, meeting market expectations.
  - Timetable for delivery of plots.
  - Land availability.
- 2.34. Other concerns relate to the design of self-build, relative to the principles set out in a wider masterplan and Design and Access Statement for any allocation. With such stringent requirements in the Plan, there are concerns about the deliverability of this.

### **Delivery Policy HC1 - Meeting housing need within defined settlements**

- 2.35. SevenHomes objects to the policy for the following reason:
- 2.36. Part 4 of the policy refers to the loss of damage to any open space or PROW which is important to the character of the settlement.
- 2.37. The concern here is that the Policy is too broadly defined and could allow decisions to be made to reject allocations on the basis that open space/PROW is considered too "important" to the character of the settlement. In addition, where is the evidence base in the Plan to ensure that allocations affected by PROWs are protected against conflicts with this part of the Policy.
- 2.38. Furthermore, if there is an important open space, this should be protected/recognised through the Council's Green Infrastructure, Sport and Recreation Study, referred to in Policy DHC6.
- 2.39. Paragraph 4.54 sets out the Council's intention to review its Residential Design Guide. This document is dated November 2000 and is simply out of date and no longer fit for purpose and should have no role in assisting the Council in making decisions in accordance with Policy HC1.



### **Delivery Policy DHC5 - Wellbeing and healthy communities**

- 2.40. This policy requires Health Impact Assessments (HIA) to be provided with all strategic development sites. Whilst this does not apply to SevenHomes' allocation PS44, it is concerned about such a requirement for the following reasons:
- What is the HIA process, if this is to be a policy requirement, why is it not specified in the Plan?
  - The role of the PPG on health outlines basic planning concepts which promote healthy communities. The need for a separate assessment is considered unnecessary.
  - The relevance of food production and community orchards in the delivery of strategic housing sites.
- 2.41. In determining any planning application against the Policy, the key consideration is what, in the Policy's view constitutes 'demonstrable adverse impact' what are the criteria against which the Council will seek mitigation and how will this be secured.

### **Delivery Policy DHC7 - Provision of new open space and built and indoor sports facilities**

- 2.42. SevenHomes objects to the Policy because it is not consistent with national guidance. The Policy requires 3.92 ha of open space per 1,000 population. Paragraph 96 requires that policies should be based on robust and up-to-date assessments of the need for facilities. Those assessments should then be used to determine what are the open space requirements arising from development.
- 2.43. As the Policy sets out an open space and sport requirement based in part on historic standards (e.g., Fields in Trust) or seeks to apply standards, there are no nationally recognised standards (e.g., orchards). In seeking to set out a typology of recreation contributions, the concern is that the Policy will be used to secure contributions towards open space/recreation facilities in locations which are not relevant to the proposals.
- 2.44. In addition, the reliance on supplementary planning document is unhelpful as it could introduce additional requirements to the Policy.

### **Core Policy CP14 - High quality sustainable development**

- 2.45. SevenHomes are concerned with the policy as drafted in that it reiterates several requirements which are equally covered by other policies in the Plan as well as in



national guidance. This repetition conflicts with the need for 'succinct' plans in paragraph 15 of the Framework.

- 2.46. It is equally not clear in the policy as to whether the requirements are mandatory or whether a balanced judgement can be reached in terms of their compliance within the policy as well as how they relate to other policies. For example, in conjunction with other submissions, SevenHomes is seeking to make best use of the land covered by allocation PS44 and increase the number of dwellings, which would better align with part 10 of the policy.
- 2.47. Further repetition to allotment/community orchards provision in major development is not necessary and should be removed.

### **Core Policy CP15 - A quality living and working countryside**

- 2.48. The general objective of the policy is to protect the countryside from development outside of settlement boundaries. However, the housing allocations in the Plan sit outside of the defined settlement boundaries and are therefore, at risk from being caught by the Policy. It is recommended that the Policy is amended to only be applicable to sites outside of settlement boundaries and allocations in the Plan.

### **Delivery Policy ES1 - Sustainable construction and design**

- 2.49. The policy sets out unnecessary repetition of Zero Carbon objectives which have been set out elsewhere in the plan and is considered unsound because it is contrary to national guidance.
- 2.50. SevenHomes' position is supported by The Written Ministerial Statement of 25 March 2015 and is clear that, from the date of the Deregulation Bill 2015 receiving Royal Assent:
- "local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings."*
- 2.51. Whilst SevenHomes is keen to stress that it agrees with the general thrust of the Council's objectives, the requirements of the policy are incompatible with the Government led approach in that it introduces effectively local standards, for example:



- In terms of achieving Zero Carbon, this standard has yet to be formally set by the Government and over the lifetime of the Plan, it would be reasonable to conclude that Building Regulations will move at a faster pace than Plan standards.
- The reference to a Carbon Offset Fund run by the Council is concerning, the policy fails to explain how this is relevant to proposals and meets the tests in the Framework. Equally there is no explanation as to how “residual emissions” will be assessed.
- Use of the Home Quality Mark – this is not a Government approved standard and should be removed from the Plan.

### **Delivery Policy DES3 - Heat supply**

- 2.52. SevenHomes objects to the Policy in seeking to ensure that developments are future proofed when it comes to local heat networks being provided in the future. The move away from gas boilers in 2025 means that developers will already be considering the need for heat generation in new homes.

### **Delivery Policy ES3 - Maintaining quality of life within our environmental limits**

- 2.53. The concern with this policy is that it is too broad in the matters which it covers and could be used to oppose housing allocations as it is subjective.
- 2.54. In terms of loss of healthy soils, or best and most versatile agricultural land, what level of loss is unacceptable? How does this balance against the housing requirements of the plan and need for affordable housing? Finally, the approach is contrary to the NPPF, which requires that the loss of such land is only considered.

### **Delivery Policy ES5 -Air quality**

- 2.55. In the case of allocation PS44, this is in an area where there are no air quality concerns. The issue that SevenHomes has is ensuring that the policy is not used to place additional unnecessary competing requirements on the master planning of the site.

### **Delivery Policy ES6 - Providing for biodiversity and geodiversity**

- 2.56. The Environment Bill has yet to receive Royal Ascent and it is not clear from the evidence base as to whether biodiversity net gain has been properly considered in the



allocations the Council has made. Furthermore, the Policy is unclear as to what will be the assessment method for calculating net gain, as required by the Policy.

- 2.57. A further concern is at paragraph 6.53 where it sets out that net gain should be achieved on sites where possible. In instances where this is not achievable, off-site measures are identified, but there are no mechanisms in place. Further policy guidance is essential to understand how this can be achieved. Otherwise, it could lead to contributions being sought which could make allocations otherwise unviable.

### **Delivery Policy ES8 - Trees, hedgerows and woodlands**

- 2.58. The concern with this policy is how the “unacceptable loss” of a tree/hedgerow is considered in the overall planning balance. The test appears to apply to all trees (irrespective of whether they are protected by a Tree Preservation Order or not). There may be instances on development sites that such loss is unavoidable because of other competing technical requirements.

### **Delivery Policy ES10 - Valuing our historic environment and assets**

- 2.59. There is a need for the policy to better align with the NPPF. Part 5 of the Policy refers to any harm or loss to any heritage interest. This ignores the guidance in paragraph 193 of the NPPF (relating to designated heritage assets) and paragraph 197 (dealing with non-designated heritage assets). Part 5 of the policy is too broad and could encompass both designated and non-designated interests.

### **Delivery Policy ES11 - Maintaining, restoring and regenerating the District’s canals**

- 2.60. The concern with the policy is that the third paragraph requires that development “adjacent” to the canal has regard to improving and enhancing views along it. This fails to consider land control where a development is ‘adjacent’ to a canal but does not have full control of the land up to the canal edge. This can be rectified with amendments to the Policy seeking such improvements “where possible”.
- 2.61. In terms of financial contributions for canal related restoration, the concern is that they must be justified against the tests in the NPPF.



### **Delivery Policy ES12 - Better design of places**

- 2.62. SevenHomes question the need for the Policy, given that it repeats several points raised in other policies.

### **Delivery Policy ES16 - Public art contributions**

- 2.63. The policy is unsound as it does not provide a framework for determining exactly how public art contributions are calculated and what is considered 'proportionate'.





## 3.0 Commentary of Local Plan Allocations

- 3.1. SevenHomes supports the Local Plan in general, however, as part of its case to increase the housing numbers allocated to PS44, it is necessary to demonstrate that there are shortcomings with several the allocations in the Plan. These are considered as follows:

### **PS01 Brimscombe Mill**

- 3.2. The continued allocation of Brimscombe Mill for 40 residential dwellings. This site has been allocated for development for some significant time (Site SA1d in 2015 Local Plan) and it is considered that this site remains undeliverable because of land ownership and drainage concerns.

### **PS02 - Brimscombe Port**

- 3.3. The continued allocation of Brimscombe Port for 150 dwellings and canal related tourism development is unsound. The site was subject to a planning application in the past 10 years for mixed-use development in 2011 (S.11/0799/OUT) for a mixed-use development of 234 dwellings. However, this was not determined (according to the planning register). It is understood that there are significant infrastructure costs in terms of the provision of a new canal link servicing the site and a need to access and acquire third party land. Due to this, it has not been possible for this site to be delivered. The Plan offers no convincing evidence about the overall viability of the proposal. Currently, the site is in an active economic use, and it is considered that the long-term aspirations of the Plan to deliver this site are simply unrealistic.

### **PS36 - Sharpness Garden Village**

- 3.4. The Plan's treatment of the garden village is unsound, when based on the assumptions made in terms of the site delivering 2,400 houses within the Plan period. Clearly, SevenHomes' interests with PS44 will not address any strategic shortfall arising from a delay in the delivery of Sharpness and SevenHomes is not looking for the site to be removed from the Local Plan. However, there is a need for realism in the delivery of the allocation and what the consequences of this will mean for short-term housing land supply in the District and the need for smaller development sites to be delivered quickly and make best use of land.



- 3.5. PS36 is a vision for a new garden community of 2,400 dwellings and 10 ha of employment land. This will result in a population of circa 5,700 assuming an average size of 2.4 persons per dwelling.
- 3.6. In creating a new community, both the Plan and the promoter's material is keen to emphasise the self-containment of the development and the need to minimise the need to travel by private car. Much emphasis in the Policy, is given to the provision of a new Railway Station and service. However, in contrast, there is no such explicit commitment in the promotion material for a railway being provided as part of the first phase of development (i.e., before 2040). In addition, there is no evidence provided in any available documentation that a new station and railway service will be provided and when that will happen. This brings into doubt the deliverability of the Garden Village as proposed.
- 3.7. SevenHomes have another concern in terms of the timetable for delivery of the allocation. For the site to be delivered, the adoption of the Local Plan will be critical. This would be towards the end of 2022, assuming a suitable EiP period.
- 3.8. Table 6 of the Plan (p306) assumes that the site will be delivering 500 dwellings in the period 2025 to 2030. This is unrealistic for the following reasons:
- Once adopted, outline application is submitted with E.I.A. Outline Planning Permission follows with a S106 Agreement.
  - In terms of delivery, publicly available research from Lichfields, concludes that sites more than 2,000 dwellings take six to seven years to deliver. This means that it will not deliver first dwellings until 2028/2029 at the earliest.
  - Matters could be further delayed by infrastructure requirements and the need/time taken to sell parts of the site to third party developers.
  - Even if delivery commenced in 2029, this would necessitate a build out rate of 218 dwellings per annum for the next 11 years for the site to deliver 2040.
  - The site represents approximately 1/3 of the annual housing target for the District. The lack of a detailed trajectory for delivery means that SevenHomes is unconvinced about the robustness of the evidence base supporting the allocation and the deliverability of the Plan as a whole.
- 3.9. This then underlines the need for other allocations to be intensified to make up the shortfall in the delivery of this allocation.



### **PS37 - New Settlement at Wisloe**

- 3.10. As with PS36, SevenHomes is concerned that the allocation is unsound, given questions marks regarding the robustness of the evidence base for delivering the site. The evidence base for the site is not as complete as it is for Sharpness.
- 3.11. The Plan assumes that the site will be a “carbon neutral” development by 2030. As set out above, even if the Plan was adopted in 2022, there would be six-year lead in before the first houses were delivered. It is simply not possible for the Plan to deliver significant number of dwellings by the 2025-2030 period. In addition, assuming a 2029 start, there is no evidence to suggest how this site can be brought forward without compromising the delivery of Sharpness, as a competitor for house purchases.



## 4.0 Site Specific Representation

- 4.1. SevenHomes support the allocation of land at Whitminster Lane (PS44) for housing development in the Local Plan. This part of the document deals with all matters relating to Frampton on Severn in the Severn Vale Parish Cluster.

### The Case for the Allocation

- 4.2. In conjunction with other representations, given the housing target of the Local Plan, the development strategy and settlement hierarchy, it is clear that Allocation PS44 is consistent with the Plan in principle. The development is equally supported by:
- The SALA – which concludes that the site has “Future Potential”
  - The Council’s Settlement Role and Function Study – which sets out the services and facilities available in Frampton on Severn.
- 4.3. In addition to the above evidence, the allocation of the site is endorsed by paragraph 78 of the NPPF. This paragraph seeks to promote sustainable development in rural areas, by locating development which will either ‘enhance or maintain the vitality of rural communities’ (page 90 of the Function Study). In this case, additional development will clearly generate a continued need for services and facilities in the village. As set out in the Hierarchy Study, Frampton on Severn benefits from a ‘good/strong’ range of local services and it is recognised as not the most accessible settlement in the District. It is well supported by services in the village and additional development in excess of the allocation (for the reasons set out below) will continue to drive a demand for those goods and services, to the long-term benefit of the village. Such an approach is also consistent with the NPPF.
- 4.4. In respect of deliverability, the SALA recognises that the site is deliverable, with a housing yield (based on 80 units) delivering by 2026. This, from SevenHomes’ perspective is important as it shows that the site can be easily delivered (from an LPA standpoint), thus endorsing SevenHomes’ view that there are no technical barriers to the rapid delivery of the site. This would meet the requirements of paragraph 67a of the NPPF in particular.
- 4.5. The above paragraphs set out SevenHomes’ position on the allocation and also set out its view that the site could be more intensively developed, which would have clear



benefits when assessed against the evidence base supporting the Plan. In maximising the opportunity the site presents, a number of concerns are highlighted below.

### **Redline boundary**

- 4.6. The boundary of the allocation is arbitrary and is not based on any evidence. There is nothing in the Plan, the Sustainability Appraisal (SA), or the SALA to indicate why the redline boundary is drawn as proposed.
- 4.7. The site is constrained by high voltage power lines which run across it and their associated easements. This limits opportunities for master planning, accommodating all the policy requirements of the Plan and developing a comprehensive strategy for the allocation and the wider land parcel in which it sits.

### **Number of dwellings**

- 4.8. The allocation is for approximately 30 dwellings which equates to less than 10 dwellings per hectare based on an allocation of 3.4ha. Such an approach is considered unsound for the following reasons:
  - 4.9. The first issue is the level of development and the need to make an effective use of land as set out in Section 11 of the NPPF. The proposed development density is clearly not in accordance with national guidance, or the other policies of the plan which seek to make best use of land.
  - 4.10. Turning to the evidence base supporting the proposed level of development in the allocation, there is nothing in the evidence base which supports such a level of development. Whilst the SALA notes the impact on the canal and the hamlet of Oatfield, these are considerations to be taken into account and not a specific constraint on overall dwelling numbers. In response to these specific considerations, the following should be noted:
    - The proposed development, irrespective of dwelling numbers will be visible from the canal mitigated by landscaping and separation buffer. In assessing the impact the proposals will have on the canal, the approach in the NPPF is that the public benefit has to outweigh the harm. In this case, the public benefit of providing additional housing and demand for services and facilities in the village of Frampton on Severn offsets any heritage impact.



- Oatfield is not a historic settlement. It does not have a conservation area and is not recognised in the Council's Heritage Strategy. In terms of its formation, the earliest OS map of 1844 records 5 dwellings at Oatfield. This pattern of development did not alter significantly until the mid 1970s. Therefore, the heritage value of Oatfield is an artificial construction. However, maintaining a landscape buffer between the new dwellings and Oatfield can address this concern.
- 4.11. The weakness with the allocation is highlighted in the SA (page 794), where the site is rated RED – for efficient use of land. In justifying the allocation, the SA is unsure of the townscape and landscape impact of the development, thus highlighting that additional development could be realised from the site. This could be addressed, if the SA had considered an alternative strategy increasing the level of development on the allocation.

### **Access Point**

- 4.12. The access point from Oatfield Road is inappropriate and considered unsound from a highway safety perspective. It currently serves as a car park for residents and users of the recreation ground. The road narrows, relative to the width at the Whitminster Lane Junction. As part of SevenHomes' proposals, access is to be taken from Whitminster Lane, with pedestrian and cycle access via Oatfield Road. The benefit of this approach is that it is technically possible to secure an access point (as demonstrated by the Vision Document) and provide opportunities to link with the footpath which crosses the site.

### **Changes Sought**

- 4.13. Considering the above, SevenHomes Homes is seeking
- An increase in the allocation to 'circa 80 dwellings'.
  - An increase in the site allocation as per the Vision Document.
  - Access via Whitminster Lane.



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