

**21 June 2023**

**Strategic site allocation G2 – Safeguarded Land at Whaddon  
Preliminary draft modification to address outstanding Historic England concerns**

In advance of the scheduled Examination hearing session for strategic site G2 (Thursday 22<sup>nd</sup> June 2023), this document provides an update on discussion between Stroud District Council (SDC) and Historic England (HE) to address HE’s outstanding concerns about the allocation policy wording and supporting text.

The Statement of Common Ground (SoCG) between SDC and HE, dated February 2023 (Examination library ref. SG09 and SG08), identifies a small number of matters that are not yet agreed, including, in general terms *“How best to ensure site-specific recommendations from the evidence base will be fully appreciated by prospective developers and given appropriate weight by decision makers (including advice in the Strategic Assessment of Land Availability (SALA) and the HIA\* for Land at Whaddon)”* (SG09, para. 3.1).

\*The Heritage Impact Assessment (HIA) referred to is published as EB120 in the Examination Library.

The SoCG Appendix A (SG08) sets out the specific unresolved issues of concern to Historic England in more detail and the SoCG emphasises that the parties (SDC and HE) committed to resolve these matters through the examination process, including by agreeing appropriate modifications. Page 5-6 of Appendix A summarises the outstanding concerns and Historic England’s expectations for how these should be addressed in the Plan:

- i. Although the ORIGIN3 draft masterplan for Taylor Wimpy relates to the preparation of a future planning application it does however help to demonstrate that the site may be able to accommodate a quantum of development in a manner that could, if suitably designed, minimise harm to the significance of St Margaret’s (Grade II\*) and Yew tree Farmhouse (Grade II).*
- ii. The LP will need to state that any proposal should ensure a positive response to the affected heritage assets within the wider landscape setting and in particular minimise harm to the significance of St Margaret’s*
- iii. There is scope to agree some key design principles in the policy to ensure such a positive response to the II\* church via a reasonable buffer (approx 250m as indicated in the ORIGIN3 Masterplan (pg 59 of the HIA); and 3 key vistas/channelled views through the development to the tower. However, the most extensive, being from Naas Lane (SW – NE direction), needs to be more generous/have a wider splay at the northern end, than indicated in the ORIGIN3 Masterplan.*
- iv. The development should also be designed to maintain a visual connection with the Cotswold escarpment to the south.*
- v. Due to the potential significant archaeology especially to the SE of the site the policy should require a layout which is informed by details of archaeological investigation, evaluation and mitigation.*

Further to signing the SoCG, SDC and HE have had some discussion and exchanged emails with a view to identifying exactly where within the policy draft text and supporting text these issues are evident, and what sort of modifications would be necessary to ensure soundness and effectiveness.

The parties have not agreed a precise form or words, as we would like to be able to look holistically at the G2 allocation policy and the supporting text (paragraphs 3.4.22 – 3.4.32), once the nature and

extent of any other necessary modifications are known (i.e. following the hearing session), as this might potentially present a need / opportunity to restructure the supporting text more extensively.

Notwithstanding this, our latest communication did result in a form of words that both parties are broadly content with and which we consider would provide a basis for addressing points i – v (listed on the previous page).

The following draft modification to Policy criterion 11 seeks to address point ii:

Modify criterion 11:

11. A layout, density, ~~and~~ built form and character which ~~reflects positively~~ responds to the site's sensitive landscape and heritage context provided by the, with particular regard to impacts on the Cotswolds AONB and local heritage assets, including Whaddon Church respectively; the Grade II\* listed Church of St Margaret at Whaddon, a prominent local landmark;

Modifications to supporting text paragraph 3.4.28 could be a means to address points i, iii, iv and v:

3.4.28 Development is envisaged as a series of neighbourhoods, linking seamlessly with the south of Gloucester at Tuffley, with a layout, density, built form and character that reflects this edge of Gloucester location. Particular care will be required to ensure that the development's layout and design does not adversely impact on views to and from the AONB escarpment to the south of the M5 and that it conserves and enhances the setting and significance of affected heritage assets, both on site and off, including the non-designated Field Buildings, areas of on-site archaeological potential and key views of the Grade II\* listed Church of St Margaret. Proposals will be informed by the Council's **Heritage Impact Assessment** (HIA) published 2022 and by appropriate archaeological investigation, evaluation and mitigation. Substantial structural landscaping will be required with a view to integrating the development with Gloucester, conserving the setting and significance of heritage assets, reflecting the distinct identity of Whaddon as a hamlet, mitigating noise from the M5 and railway line and providing a long term strategic landscape buffer to Gloucester. This will include a green buffer on the western, southern and eastern edges of the development. A buffer of approximately 250 meters around St Margaret's Church will help retain the historic building's prominence in the landscape, while key vistas/channelled views through the development to the Church tower will also be incorporated - the most extensive of these being from Naas Lane, with a generous splay at the north-eastern (church) end. Where possible, green infrastructure within the development will link with existing green infrastructure beyond, to create sustainable green corridors.

The paragraph as drafted in the Submission plan does mention heritage assets, but deals more broadly with layout, density, built form and character to reflect the site's location, including other strategic landscaping and design matters to do with the AONB, edge of Gloucester context, road and rail noise and green infrastructure. The parties recognise that there may be some benefit to disaggregating some of these matters, resulting in slightly more extensive restructuring than as drafted above.

**SDC June 2023**