

Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="√"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="√"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

PS46 Land West of School Lane, Whitminster

Pegasus supports the proposed allocation PS46 Land West of School Lane. The land lies north of the Whitminster Playing Field and is proposed in the Pre-Submission Plan for development comprising 40 dwellings and open space uses and strategic landscaping. The site, West of School Lane is included in the SALA (May 2017) (ref WHI005).

PS46 is supported to meet local needs, however, as shown in Appendix 1, the site could accommodate up to 60 dwellings (without harm) satisfactorily on that portion of the site that is currently proposed as an emerging allocation; consequently making an efficient use of land in accordance with the Section 11 of the NPPF (2019) in a sustainable location. An illustrative

layout (Scheme B) showing how up to 60 dwellings is included in Appendix 1. This was submitted to the Council in response to the Reg 18 consultation stage in January 2020

Furthermore, Appendix 1 also provides additional information (which has been submitted to the Council) illustrating how around 100 dwellings (Scheme A) could be accommodated on a gross site area of 4.19 hectares having regard to the setting of the designated Industrial Heritage Conservation Area to the south west, the Grade II* Listed Wheatenhurst Church to the north west, and the desirability of maintaining separation between Whitminster and the group of buildings comprising Highfield House to the north west by providing landscaping/green infrastructure along the western and northern edges.

Appendix 1 demonstrates that the proposed allocation could be readily extended north-west of the site. Appendix 1 includes two illustrative masterplans

The SALA confirmed that there are no physical, environmental or heritage constraints preventing the development, both parcels to the west and to the east of School Lane have reasonable access to services and facilities in the local area.

In addition Appendix 2 illustrates for the land east of School Lane, Whitminster, which has a gross area of 6.20 hectares and could accommodate around 200 dwellings (Scheme 1) or around 100 dwellings on part (Scheme 2).

APPENDIX 2: LAND EAST OF SCHOOL LANE, WHITMINSTER

Land East of School Lane was included in the SALA May 2017, (ref WHI001) There are no significant physical constraints. Whitminster is a third-tier settlement in adopted Policy CP3 of the Stroud Local Plan (2015) and is a Tier 3a settlement in the proposed Draft Local Plan. As referred to above Whitminster provides a range of local services and facilities that meet the day-to-day needs of residents, including a Primary School, convenience store and post office, 2 no. pubs / restaurants, a village hall, children's play area and playing fields. The village is also served by regular bus services between Gloucester and Dursley that stop outside the Whitminster Inn on the A38.

Whilst the site lies outside the existing settlement boundary for Whitminster it adjoins existing built form and the existing settlement boundary to the south east and a number of residential properties. The site adjoins agricultural land to north, east and, on the opposite side of School Lane, to the west with houses on Holbury Crescent to the south. The site is therefore well related to the existing built form of Whitminster.

The site is also well related to existing local facilities in the village of Whitminster, in particularly Whitminster CoE Primary School which is less than 100m to the south east of the application site. Whilst other local facilities (including bus stops) are located towards the east of the village they are all within a 5-10 minute walking distance of the site and therefore fully accessible to the site without reliance upon the private car.

There are no known physical constraints that would prevent development of this site. The site is relatively level; a public footpath crosses the site, there are no known ground contamination or land stability issues; there is good access to School Lane; there is reasonable access to services and facilities in the local area.

The latest Landscape Sensitivity Assessment (2016) has identified the site (ref changed to Wh04) as Medium sensitivity to Housing Use and High sensitivity to Employment use.

An initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to any designated heritage asset.

An initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to any designated natural environment site. The assessment did not consider whether there are protected species on this site.

The SALA (2017) concluded that:

“Although not currently policy compliant, there may be some potential for housing development in the future on the south eastern part of the site, south east of the public right of way, should the Local Plan strategy identify the need for growth in this location although substantial tree screening on the North Eastern boundary would be necessary to limit the impact on views from the north, north east and east. Employment development is not suitable.”

It is noted that the SALA considers the development potential of the site,

“Taking account of the character of the site and its surroundings, the south eastern part of the site could be developed for medium density development typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of about 25dph, and the suggested yield is 45 units.”

The site is environmentally unconstrained and will not lead to any harm in terms of impact on highway safety, flooding, heritage assets, landscape or biodiversity. The proposed development is therefore considered to represent sustainable development in accordance with paragraph 11 of the NPPF (2019) with no unacceptable adverse or severe impacts that would significantly and demonstrably outweigh the benefits of delivering housing in a sustainable location which would contribute towards the Council’s five-year housing land supply requirement.

The LUC (2021) Sustainability Appraisal that accompanies the consultation indicates in Appendix 5 page 204 Table A5.1 that the site performs well compared to other submitted sites at Whitminster. The site has no discernible impact on the historic environment or water quality, climate change or waste while it is judged as having a minor positive impact on housing, health and economic growth. However, it concludes in Appendix 7 of the SA (2019) page 694 that:

“Draft Local Plan Stage: Having considered the scale of growth appropriate for this settlement set out in the Draft Plan and the benefits and disbenefits of this site in comparison with alternative sites at this settlement, it is not proposed at this stage to allocate this site for development.”

The development of both sites at Whitminster are not dependent on the other and could be delivered separately or together. Both parcels are unconstrained and deliverable in the short term. Housing delivery programmes for both sites are provided in the respective appendices.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy PS46 should be modified to make the most efficient use of the site in accordance with the NPPF Section 11 Making Effective Use of Land and increase the number of dwellings to up to 100. This will support the role and function of Whitminster as a Tier 3a settlement.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

