



1. The purpose of this Paper is to set out SevenHomes's position in respect of Matter 6A.

Question 3A

2. At this stage it is unclear how Policy CP5 relates to any of the allocations in the Plan. The purpose of the Plan (amongst other things) is to make allocations to meet housing requirements. In this case, the requirements set out at points 1 to 5 relate to decisions that should be made in respect of allocating sites in the first place and are therefore, redundant given that in making the Plan, the Council has exercised a judgement on these points in deciding which allocations to make.

Question 3C

3. Turning to requirements A to H of the Plan, SevenHomes is concerned that they are unclear and unquantifiable in a development management context. For example, requirement B focuses on waste minimisation and recycling. The concern here is by what metric do the Council assesses the performance of a site against this requirement and how reasonable is that assessment. It could lead to unreasonable expectations being placed on development sites which would conflict with other policies in the Local Plan and other sources of guidance/policy (e.g., Building Regulations).
4. Therefore, the policy fails the test in paragraph 16 of the NPPF requiring policies to be clearly written. As shown above, the point of the policy is clearly questionable given that its aims and objectives are easily incorporated into other policies in the Plan.

Question 4A to 4E inclusive

5. In the case of allocation PS44, it is unclear how the 30-dwelling allocation has been determined by the Council and that a more detailed evidence base exists in the form of the planning application submitted on the site and wider land by SevenHomes.
6. In terms of the evidence base for the site, the SALA FRA004 clearly identifies that a higher level of housing is achievable (albeit with an increased site area). In submissions on Matter 2, SevenHomes has demonstrated that conclusions in the SALA and other documents highlighting a conservation issue have not been substantiated and when properly assessed as part of a planning application, they've been found to be misplaced.



Therefore, in increasing the size of the allocation (as proposed by SevenHomes) there is the necessary evidence base to support such a decision.

7. Turning to question B, the technical constraints of the power lines is noted in the SALA assessment of the site. However, in terms of the other constraints (conservation impact and coalescence with Oatfield) these are not substantiated in the evidence base prepared by the Council and the work undertaken by SevenHomes in proceeding with an application on the wider site has shown that this is not an issue.
8. In respect of Question C, the total site area for the allocation is 3.4ha. With a development figure of 30 dwellings being allocated to the site, equates to a density of 10 dwellings per hectare, this is not making an effective use of land as per the NPPF. However, this can be easily redressed through increasing the extent of the allocation to allow for the proper detailed masterplanning of the site, taking into account site-specific constraints as well as Local Plan policy objectives. Through this, it is possible to achieve circa 80 dwellings on the wider field parcel, in a way which meets the technical constraints to site layout and Local Plan policy objectives.
9. In response to question 4D SevenHomes supports the flexibility in allocation numbers and would welcome consistency across the Plan and proposes the use of "circa".
10. Overall, in response to Question E is that the development density and capacity for each site in the Plan (certainly in SevenHomes's experience with PS44 is not justified). This analysis shows that there are gaps in the evidence base supporting the decisions in the Plan and through the application process, SevenHomes has been able to demonstrate those gaps and where higher levels of development are technically possible.

Question 13

11. In the case of allocation PS44, the site allocation policy does refer to the production of a masterplan. As drafted, the Policy states that:

"A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner."

12. Clearly the responsibility of the Council is identified in approving the masterplan and paragraph 3.6.6 of the Policy provides more detail about the requirements of the



allocation. However, it is not clear how the masterplanning work will be undertaken. In preparing a masterplan for the site, it is essential that a constraints and opportunities exercise is carried out to understand how a site can be developed in the context of general planning policy requirements and site-specific technical constraints. This work should highlight how a parcel of land could be developed and inform the extent of the any proposed allocation.

13. In general terms, SevenHomes does not have any evidence that the Council has undertaken this work in supporting the allocations in the Plan. Two examples of this are:

- PS44 – Northwest of Whitminster Lane
- BER016/17 – Land at Lynch Road, Berkely

14. Both these sites have technical constraints. In the case of the former, the presence of high voltage power lines which cross the site has to be accommodated in its layout to make space for access and cable swing. In the case of the latter, the allocation is drawn in such a way that the access point appears to be pre-determined, without any thought for how this is technically achievable, within the red-line of the allocation.

15. In making the allocations, it is clear that the Council has not undertaken these exercises in-house and is clearly looking to the development community to show how these sites can be delivered. In so doing, however, it is important that the Council has an open mind about the extent of land allocated and is willing to be flexible about the extent of allocations and the quantum of development. This is especially the case where decisions about the extent of an allocation (e.g., PS44) are not based on any detailed technical evidence to support the decisions made by the Council.

Question 14

16. SevenHomes has sought to agree a Statement of Common Ground with the Council with regard to the delivery of allocation PS44. However, no such offer has been taken up by the Council.

17. In terms of the delivery of the allocation. The site is the subject of an outline planning application for up to 80 dwellings, with all matters bar access reserved. This is currently being determined by the Council with a number of the technical matters having been fully

STROUD DISTRICT LOCAL PLAN EiP

Submission on behalf of SevenHomes

Matter 6A



addressed. Depending on the Council's desire to see the early delivery of the site, the application could be determined easily this year and a S106 agreement entered into. As SevenHomes intends to develop the site, a Reserve Matters application will follow rapidly thereafter, and it is reasonable to conclude that Reserve Matters could be granted as quickly as 6 months from the date of the outline planning permission. Development of the site can commence thereafter, with the site being completed within a 5-year timeframe.