
Land at Upton's Gardens,
Whitminster
**Stroud District Local Plan
Review Draft Plan for
Consultation**

On behalf of Swan Hill Homes

January 2020

ORIGIN3

Planning . Design . Development

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DOCUMENT	Stroud District Local Plan Review Draft Plan for Consultation
ISSUE DATE	January 2020
DOCUMENT STATUS	Issue
REVISION	
AUTHOR	AC
CHECKED BY	JM

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1 Introduction

- 1.1** These representations to the Stroud District Local Plan Review: Draft Plan for Consultation (November 2019) have been prepared by Origin3 on behalf of Swan Hill Homes in relation to their development interests at land West of Upton's Gardens, Whitminster.
- 1.2** These representations comment on the following policies:
- Core Policy CP2 (Strategic Growth and Development Locations)
 - Core Policy CP3 (Settlement Hierarchy)
 - PS45 (Land West of Upton's Gardens).
- 1.3** The most pertinent issues raised within this set of representations are as follows:
- The inclusion of a housing requirement in draft Core Policy CP2 for the settlement of Whitminster is supported.
 - The provision of additional housing growth at Whitminster which will improve self-containment levels, diversify the demographic baseline of the settlement and allows the settlement to organically grow and expand is supported.
 - The identification of Whitminster as a Tier 3a settlement is supported. Whitminster is one of the District's larger villages and provides an important local employment, service and community role.
 - The identification of our client's land West of Upton's Gardens (ref. PS45) as a site allocation for housing is supported in-principle however the identification of the land for 10 dwellings is contested, as it is believed that the site could accommodate a greater number units.
 - Initial master-planning and layout testing work has demonstrated that the site could accommodate around 13 dwellings and therefore the draft policy text for PS45 should reflect this in order to support a flexible and design-led approach.
 - The requirement to prepare a development brief for the site is not supported and should be removed. This is considered to be an overly onerous requirement for a development of this nature and scale.
 - To promote the development of a good mix of sites, the NPPF at paragraph 68 requires local planning authorities to identify, through the Development Plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. The site at land West of Upton's Gardens (PS45) measures 0.90ha and can therefore contribute to this requirement.

2 Core Policy CP2 – Strategic Growth and Development Locations

- 2.1** Section 2.5 (Housing) of the Stroud District Local Plan Review – Draft for Consultation, explains that there is a housing requirement for at least 638 new homes per year, as identified using the Government’s Standard Method. This is a 40% increase from the adopted Local Plan figure of 456 homes per year.
- 2.2** Draft Core Policy CP2: Strategic Growth and Development Locations, sets out that the District will accommodate at least 12,800 additional dwellings and 650 additional care home bedspaces to meet the housing needs of the District over the plan period, 2020 to 2040. The approach to establishing the minimum number of homes needed in the District is generally supported, as is the reference to the plan being kept under review given that the Government’s Standard Methodology is currently being reviewed and may be subject to amendment in the future.
- 2.3** Section 2.5 explains that following an assessment of existing supply, the residual housing requirement, following completions and commitments is for circa 8,000 new homes. Draft Policy CP2 identifies strategic development sites and local development sites amounting to 8,725 new homes and a housing requirement for a minimum of 40 new homes is identified for Whitminster. The approach taken in Draft Policy CP2, of identifying and allocating development sites at both strategic and a local scale, is supported.
- 2.4** The allocation of specific development sites through the Local Plan process not only provides a greater degree of certainty and confidence in delivery for both the local community and the development industry, but is also in accordance with the NPPF which, sets out that plan-making should positively seek opportunities to meet the development needs of their area (paragraph 11 of the NPPF). The identification of a housing requirement for Whitminster is also supported for the reasons set out below.
- 2.5** Previously, there was no housing requirement identified for Whitminster. The spatial distribution strategy set out in the Emerging Strategy Paper (November 2018) only included small amounts of new residential growth at the Tier 3a settlements (see commentary on Draft Policy CP3:

Hierarchy, in Section 3) nearest to Stroud & Wotton-under-Edge¹. However, in response to additional evidence and public comments received during the public consultation, the Draft Local Plan has been revised and new allocations are identified at Tier 3a settlements, including at Whitminster, and some allocations have been deleted given their potential to adversely impact upon the Area of Outstanding Natural Beauty (AONB) and its setting.

- 2.6** The Draft Local Plan now includes housing allocations at the following Tier 3a settlements; Brimscombe & Thrupp, Eastington, Frampton-on-Severn, Kings Stanley, Kingswood, Leonard Stanley, North Woodchester and Whitminster. These are villages that have a range of local facilities and already benefit from good transport links, or they have the potential to develop better transport links to strategic facilities at the nearby towns of Stroud and Wotton-under-Edge.
- 2.7** The approach to direct additional housing growth to Whitminster is wholly supported. Whitminster is a sustainable location and is one of the District's larger villages. The settlement has experienced an above average housing growth of 7% (an additional 24 dwellings which equates to 3 dwellings per annum) between 2011 and 2018 (compared to 6% growth across the District as a whole) which demonstrates there is a strong market for growth. Stroud District Council should be actively promoting additional growth in sustainable locations to satisfy market forces and ensure that sufficient numbers and types of new dwellings are delivered at locations where they are needed.
- 2.8** Furthermore, Whitminster has a below-average proportion of children in the settlement (22% compared to the District wide 23%). Additional planned housing growth in this location could therefore maintain diversity and demographic vitality in order to sustain the local school.
- 2.9** Whitminster provides a strong employment role for the local area with nearly 700 jobs² in the locality resulting in an employment density ratio of 1.41³. This means that there are 1.4 jobs for every economically active resident in Whitminster, which means that people will be driving into Whitminster to work. Increasing the self-containment of settlements is an aim of the emerging Local Plan, paragraph 2.59 explains that co-locating employment with housing provides the best opportunity for greater self-containment and shorter journeys to work are more likely to be by means other than the private car. Additional housing in Whitminster will assist in improving self-containment and reducing the need to travel.

¹ Brimscombe, Kings Stanely, Kingswood, Leonard Stanely, North Woodchester and Thrupp.

² Employers in the locality include; Highfield Garden World, Edinburgh Woollen Mill, Teckels Animal Sanctuary, World of Water Aquatic Centre, Attwools Outdoors, public houses and Whitminster CoE Primary School.

³ Settlement Role and Function Update (2018)

- 2.10** Whitminster also has a strong service role. The retail offer is good given the size of settlement with a range of local shops to serve the day-to-date needs of the community and also the surrounding area. The garden centre acts as a local hub. The village also offers access to a range of key local community services and facilities including a primary school, mobile post office, pub, village hall, playing field / sport pitch which includes a well-equipped playground.
- 2.11** The settlement of Whitminster is relatively free of constraints. The settlement is not situated within or in close proximity to the Cotswold AONB. The settlement is wholly located within Flood Zone 1 and is therefore at low risk of flooding from rivers or the sea. The settlement is also largely unconstrained by environmental or topographic constraints.
- 2.12** Paragraph 78 of the NPPF is clear that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for rural communities to grow and thrive, especially where they will support local services.
- 2.13** The inclusion of a housing requirement in Draft Core Policy CP2 for the settlement of Whitminster is supported. Whitminster is a sustainable settlement, it performs an important local employment, service and community role and is relatively free of environmental designations and constraints. The provision of additional housing development will improve self-containment levels and diversify the demographic baseline of the settlement, allowing the settlement to grow and expand organically.

3 Policy CP3 – Settlement Hierarchy

- 3.1** Draft Policy CP3 sets out the Local Plan settlement hierarchy which will inform the growth and development across the District’s settlements. Six tiers are identified:
- Tier 1 – Main Settlements
 - Tier 2 – Local Service Centres
 - Tier 3a - Accessible Settlements with Local Facilities
 - Tier 3b – Settlements with Local Facilities
 - Tier 4a - Accessible Settlements with Basic Facilities
 - Tier 4b – Settlements with Basic Facilities
- 3.2** Proposals are required to be located in accordance with the hierarchy and should seek to reduce the need to travel and promote sustainable communities, based on the services and facilities that are available in each settlement.
- 3.3** Whitminster is identified as a Tier 3a settlement which is defined as an ‘accessible settlement with local facilities’. This tier covers medium-sized and large villages that are generally well-connected and accessible places with a good range of local services and facilities for their communities. They are also closely connected to higher tier settlements, enabling residents to access additional key services and facilities and have greater employment opportunities than in the immediate settlement. These Tier 3a settlements are considered to offer the best opportunities for growth to improve self-containment outside the District’s Main Settlements (Tier 1) and Local Services Centres (Tier 2).
- 3.4** The identification of Whitminster as a Tier 3a settlement is wholly supported. Whitminster is one of the District’s larger villages and as set out in paragraphs 2.9 and 2.10 above, performs an important local employment, service and community role. It provides access to a range of key local services and facilities including a primary school, mobile post office, pub, village hall, playing field / sport pitch which includes a well-equipped playground. The settlement is well placed in terms of access to the strategic road network being circa 1 mile from Junction 13 of the M5 and is in close proximity to the larger “Main Settlement” (Tier 1) of Stonehouse, which offers access to a wider range of services and facilities. It clearly meets the criteria identified for a Tier 3a settlement.
- 3.5** Paragraph 59 of the NPPF sets out that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come

forward where it is needed. Furthermore, paragraph 78 highlights that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. This approach is true for Whitminster and the approach taken in the emerging Local Plan is supported.

- 3.6** The development strategy for Tier 3a settlements which allows for (inter-alia) organic growth on the edge of these settlements to meet local housing, employment and community infrastructure needs, is wholly supported. Tier 3a settlements such as Whitminster can accommodate a level of growth needed to support the vitality of these communities and can provide for flexibility and diversity in the housing supply through the range and type of sites they can bring forward.

4 PS45 – Land West of Upton’s Gardens

4.1 Two sites are allocated in Whitminster. The identification of our client’s land West of Upton’s Gardens (ref. PS45) as a draft site allocation for housing is supported in-principle but the identification of the land for 10 dwellings is contested, as it is believed that the site could accommodate a greater number of units.

4.2 The site was assessed through the Strategic Land Availability Assessment in 2017 to inform emerging Local Plan allocations. This assessment concluded that the site (ref. WHI004 Land West of Upton’s Garden) was suitable, available and achievable for development with for a range of potential uses including residential, community, sports and leisure uses. The development potential summary notes:

“Taking account of the character of the site and its surroundings, this site could be developed for community, sports and leisure or low density development typically comprising a mix of detached, semi-detached and terraced dwellings at an average density of about 25 dph, and the suggested yield is around 10 units”

4.3 The above assessment has informed the draft allocation. The SHLAA states that there are no known physical constraints that would prevent the development of the site.

4.4 Parklands House is a Grade II listed building lying immediately to the south of the site. The only concern regarding the suitability of the site appears to be any potential impact of designated heritage assets, namely Parkland House. As a result of this concern, the SHLAA confirms that the north eastern half of the site has development potential. It was noted that the existing tree boundaries should be protected and enhanced and a new strong south-western planted boundary put in place to screen the development and form a new permanent edge to the settlement. Taking into account the character of the site and its surroundings, the site was identified as having potential for a low density development (circa 10 dwellings) comprising a mix of detached, semi-detached and terraced dwellings at an average density of 25 dph.

4.5 By taking into consideration the siting of new development, open space and landscaping, it is considered that a sensitively designed scheme could be brought forward on this site, respecting the nearby heritage assets and its setting. It is considered that the site can accommodate more than 10 dwellings and initial masterplanning and layout feasibility work prepared by Origin3, appended to this representation, demonstrates that the site has capacity for circa 13 dwellings

along with community / open space uses and landscaping. The proposed layout responds to the heritage constraint whilst making an efficient use of land as is required by the NPPF (para 117).

- 4.6 The site is contiguous with the current built envelope of Whitminster with existing residential development to the east and south. The site is well enclosed with mature trees and hedging on all boundaries which can help reduce any potential landscape or visual impact. There are no known physical constraints that would prevent development of this site. The site offers good access to services and facilities in the local area including access to the primary school along a route entirely served by existing footpaths.
- 4.7 The site is located outside of a Conservation Area and is not at risk of flood by river or sea (Flood Zone 1). The SHLAA assessment confirms that an initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop this site without harm to a designated natural environment site. The site is not within 1km of internationally or nationally designated sites or 250m of locally designated sites.
- 4.8 The site is under a single land ownership and is considered suitable available and achievable for residential development within the next five years at a highly sustainable settlement which benefits from access to a variety of local services and community facilities.
- 4.9 Comment on the wording of policy PS45 (Land West of Upton's Garden) is set out below. For ease of reference the wording is set out below.

Land south of Whitminster Playing Field, as identified on the policies map is allocated for a development comprising 10 dwellings an associated community and open space uses and strategic landscaping. Detailed policy criteria will be developed where necessary to highlight specific mitigation measures and infrastructure requirements. A development brief incorporating an indicative masterplan to be approved by the District Council, will detail the way in which land uses and infrastructure will be developed in an integrated and co-ordinated manner.

- 4.10 The draft policy wording sets out that the site is allocated for 10 dwellings along with associated community and open space uses and strategic landscaping. On the basis of the above it is considered that the policy wording for PS45 be amended to state "*Land south of Whitminster Playing Field, as identified on the policies map is allocated for a development comprising around 13 dwellings and associated community and open space uses and strategic landscaping*".

- 4.11** This proposed amendment would provide for a more flexible and design-led approach for the site responding positively to the site's constraints and opportunities. As noted in national guidance, planning policies should promote the effective use of land in meeting the need for homes and other uses.
- 4.12** The requirement for a development brief is not supported and should be removed from the policy wording. A development brief is considered to be an overly onerous requirement given the scale of the proposed development / site. Development briefs are usually associated with larger, more complex development schemes which include multiple phases to be undertaken over a considerable period of time.
- 4.13** Furthermore, given the nature and characteristics of the site there is likely to be only a limited number of ways in which the site could be masterplanned. A robust masterplan underpinned by the relevant technical baseline assessment and surveys would be prepared in consultation with the Parish, local community and officers during the pre-application stage. This masterplan would then be robustly tested through the development management process, where key stakeholders and planning officers would be able to provide further comments / inputs.
- 4.14** Policy PS45 (Land West of Upton's Gardens) provides the opportunity to enhance the sustainability of a smaller settlement enabling organic growth and providing a small scale, deliverable housing opportunity without overriding infrastructure requirements. It is recognised at a national level that greater diversity is required in the housing market and that opportunities for SMEs, through for example, the provision of small sites will enable quicker delivery of much needed local housing.
- 4.15** National planning policy guidance is clear that strategic policies should identify a sufficient supply and mix of sites, including small and medium sized sites which can make an important contribution to meeting housing requirements.
- 4.16** To promote the development of a good mix of sites, the NPPF at paragraph 68 requires local planning authorities to (inter-alia) identify, through the Development Plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. The site at Land West of Upton's Gardens (policy ref. PS45) is 0.90ha (net developable area comprise 0.38ha) and can therefore contribute to this requirement of the LPA and its plan-making approach.

5 Conclusion

- 5.1 In conclusion, we welcome this next step of the Local Plan process and also the opportunity to work with the Council in order to bring forward our client's site at land West of Upton's Gardens (policy ref. PS45) which is a draft housing allocation, for delivery within the new Plan.
- 5.2 The identification of Whitminster as a Tier 3a settlement is supported. Whitminster is one of the District's larger villages and provides for an important local employment, services and community role and function.
- 5.3 The provision of additional housing development in sustainable locations such as Whitminster which allow settlements to organically grow and expand is supported.
- 5.4 Land West of Upton's Gardens is a credible and deliverable housing options and presents a suitable and sustainable location to direct new housing development. The site is available for development immediately.
- 5.5 The policy wording for the draft allocation of our clients site (PS45 – Land West of Upton's Gardens) should be amended to “*13 dwellings..*” in order to support a flexible design led approach and the requirement for a development brief removed given that it is an onerous requirement for a development / site of this scale.



Approximate Areas

13 residential units total
 0.90ha / 2.22ac Site Area
 0.38ha / 0.94ac Net Developable Area

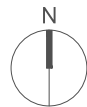
Notes

Proposal produced with only limited baseline information. Several surveys and assessments are required to develop proposals including, but not limited to the following specialist fields:
 - topographical, trees, utilities, heritage, drainage and geotechnical

proj: 18-088 drg: SK003 date: 06/01/2020 rev: -

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UPTON GARDENS, WHITMINSTER
Sketch Proposal

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Sketch proposals are for illustrative purposes only & as such are subject to detailed site investigation including ground conditions/contaminants, drainage, design & planning/density negotiations. Sketch proposals may be based upon enlargements of OS sheets & visual estimations of existing site features, accuracy will therefore need to be verified by survey.



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