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24/10/2022

Local Plan Team
Stroud District Council
VIA EMAIL ONLY

Dear Sir or Madam

**STROUD DISTRICT LOCAL PLAN REVIEW:
ADDITIONAL TECHNICAL EVIDENCE CONSULTATION
Responses on behalf of SevenHomes (rep no 880)**

On behalf of its client SevenHomes, McLoughlin Planning has been instructed to respond to two of the documents presented in the Additional Technical Evidence Consultation (ATEC). These submissions should also be read in conjunction with the Regulation 19 response on behalf of SevenHomes in regulation to Policy CP6 in particular.

Context

SevenHomes is in the process of actively promoting land at Whitminster Lane, Frampton on Severn for housing development. It supports the allocation of the site in the emerging Local Plan (PS44) but in critically reviewing the allocation and the plan, SevenHomes considers that the Plan is not making the full potential the site offers. As a result, it is seeking a higher level of development and an increased site allocation to accommodate it.

The site is also the subject of an outline planning application for up to 80 dwellings with all matters bar access reserved. The reference number for the application is S.22/0285/OUT.

Document EB108 Suitable Transport Strategy (STS) Addendum

SevenHomes wishes to make the following observations.

The document is focused on providing an update of the original STS of 2019 and in light of submissions already made, contains the same flaw in that it solely focuses on strategic allocations in the Plan, ignoring the Strategy implications of other smaller housing allocations made in the Plan.

The STS update is a missed opportunity to provide a better focused document. For example, paragraph 3.6 of EB108 requires bus stops to be provided in new development. In the case of allocation PS44, this is simply not possible as the site is not directly situated on a bus route. Therefore, how can the allocation meet this objective?

The final point is that in seeking to deliver allocation PS44 and the additional numbers sought, the STS update provides no data on the transport infrastructure improvements which will be required. It would be of great assistance to SevenHomes that the infrastructure improvements



required were specifically highlighted in the STS update so that requirements could be fully understood.

Document EB110 Infrastructure Delivery Plan (IDP)

SevenHomes wishes to make the following observations on the updated IDP.

1.2 Methodology

In conjunction with the Reg 19 submissions, the differential between strategic sites and local sites in the plan is not properly justified and unhelpful.

2.1.1

This part of the IDP focuses on the various transport related infrastructure requirements arising from the new local plan allocations. In this part of the document, reference is made to J13 of the M5 and the need for allocation PS44 to contribute to it. However, when compared to the previous IDP (EB69) there is no such reference to allocation PS44 having to contribute towards M5 J13 upgrades. To further complicate matters, the IDP update does not provide any calculation demonstrating what level of contribution will be sought from PS44.

2.1.2

This part of the IDP focuses on transport improvements on the A38 Corridor Package. As with concerns expressed at 2.1.1, Allocation PS44 is identified as contributing to general improvements on the Corridor. In terms of the level of funding sought, the IDP provides a calculation of contributions from the strategic sites but fails to make any calculation for 'local' sites. As a result, it is not possible for SevenHomes to have any certainty about the level of contribution it will be liable for. Given the lack of this information, it is not possible for SevenHomes or the Local Plan to understand the resultant impact on the viability of allocation PS44 as a 30-dwelling allocation. The difficulty arising from this lack of information is further compounded by the fact that the IDP sets out that the Corridor Package has a total cost of £3.8 million and the strategic sites account for £2.7 million of funding to deliver this package. This leaves £1.1 million unaccounted for in terms of what the local sites will contribute towards these improvements. Whilst PS44 cannot deliver the shortfall, it provides additional justification for the increase in dwelling numbers at PS44 to 80 units as opposed to 30 allocated. This increase could provide some funds towards those improvements, only if they are properly justified in accordance with paragraph 57 of the NPPF.

Highways contributions – general points

The above concerns show a lack in transparency in the evidence base which will be used by the Council in determining the planning application for the site and determining exactly what level of contributions should be sought to support new development. The situation is further complicated by the fact that the County Highways response to the planning application currently in determination at Stroud District does not allude to any highways contributions to the M5 J13 or the A38 Corridor Package.

2.3.1

In conjunction with Reg 19 submissions – SevenHomes is concerned about the treatment of BNG in the emerging Local Plan and the robustness of the assumptions the Plan makes in allocating sites for development and their ability to meet 10% BNG. Page 5 of the document sets out a mechanism where BNG cannot be provided for on site. The concern here is that whilst

there is a potential mechanism, the first paragraph under the flowchart on the top of Page 6 states that:

"The GNCF is currently briefing the Gloucestershire Authorities, including Strategic Directors, Planning Officers, Councillors and Members with the aim of agreeing a memorandum of understanding to establish joint-working and a county-wide approach. It is also asking local authorities to identify sites that could be utilised to provide off-site BNG."

The issue with this is that whilst there is a clear aim of agreeing a county wide approach, it is far from being delivered at a policy level, let alone at a practical level as there are no sites identified in the IDP against which BNG off-site mitigation can be delivered. The risks associated with this are that where allocations cannot deliver BNG on them for legitimate planning and land control reasons, they are highly likely to be stalled in the process and will only come forward, once mitigation sites are provided. In pursuing an application on PS44, SevenHomes has demonstrated how BNG can be delivered and why it requires a larger allocation. This continues to highlight the lack of understanding of the BNG issue by the Council in preparing allocations in the Local Plan. It further reinforces the need for larger site allocations to ensure that BNG can be delivered.

Table 5 Cotswold Beechwood SAC

Developer contributions towards the mitigation of recreational impacts arising from new development in the Beechwood SAC are critical to addressing potential Natural England objections to development. The IDP simply fails to recognise the contribution being sought from PS44 which is understood to be £187 per dwelling. The table should be updated to reflect this contribution as well as that sought from other local sites.

I trust the above is clear and look forward to hearing on the dates of the EIP.

Yours faithfully

 **BSc (Hons) DipTP MRTPI**
Managing Director