

**EXAMINATION OF THE STROUD DISTRICT LOCAL
PLAN REVIEW**

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

MATTER 6g:

The Severn Vale site allocations

On behalf of: Robert Hitchins Ltd

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Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 6g, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 6
- Matter 6a
- Matter 6c
- Matter 6d
- Matter 6g
- Matter 7
 - Matter 7a
 - Matter 7b
 - Matter 7c
- Matter 8
- Matter 10
 - Matter 10a
 - Matter 10c
 - Matter 10d
- Matter 11
 - Matter 11a
 - Matter 11b
 - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



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6. SITE ALLOCATIONS – GENERAL QUESTIONS

6.1 Matter 6g – The Severn Vale site allocations

Local Sites Allocation Policy PS44 Northwest of Whitminster Lane

45. The site is allocated for approximately 30 dwellings and open space use to provide an extension to Frampton-on-Severn.
- What type and level of open space uses would be required or is this covered by other policies?
 - The policy lists three issues to be addressed which include incorporating the Public Right of Way into the development, the proximity of the Gloucester and Sharpness Canal and ensuring a high quality edge to Frampton. What specifically would the development be required to achieve; would the requirements be justified and are they viable? Should these be clearly set out within the policy?
 - Some of the representations raise concerns about other issues relating to the development of the site, including drainage and sewage infrastructure, the siting of the access and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

45.1 No comments.

Local Sites Allocation Policy PS45 Land west of Upton's Garden, Whitminster

46. The site is allocated for approximately 10 dwellings and open space uses and strategic landscaping.
- What type and level of open space uses and strategic landscaping would be required or is this covered by other policies? The supporting text states that the western half of the site should be retained as accessible open space, to protect the setting of Parklands House to the south, but reasons for this are not given. Is this a heritage asset and is the retention of open space justified in this context?
 - Which heritage assets need to be 'conserved and enhanced' and is the wording in the policy consistent with national policy?
 - How will a decision-maker determine whether landscape impacts are minimised and local biodiversity is safeguarded and enhanced? Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?
 - Should the requirements in the supporting text be set out in the policy and if so are they justified and suitably clear?
 - Some of the representations raise concerns about other issues relating to wildlife habitat, waste water infrastructure and public transport. Have such factors been suitably assessed as part of the process to allocate this site?

46.1 No comments.

Local Sites Allocation Policy PS46 Land west of School Lane, Whitminster

47. The site is allocated for up to 40 dwellings and open space uses and strategic landscaping.

- a. Some details on open space and landscaping are provided in the supporting text. Are these policy requirements, are they justified and should they be set out in the policy?
- b. How will a decision-maker determine whether landscape impacts are minimised? What is strategic landscaping? Do specific landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?
- c. Some of the representations raise concerns about other issues relating to the Industrial Heritage Conservation Area, waste water infrastructure and public transport. Have such factors been suitably assessed as part of the process to allocate this site?

47.1 It is for the Council to justify the wording of the policy. Topic Paper: Assessment and selection of sites October 2021 (EB9) sets out the assessment process and highlights the key factors the Council has weighed in the balance, in terms of site selection.

47.2 In respect of the policy wording, for the purposes of preparing the planning application it is considered that sufficient detailed is included in Policy PS46. A planning application for up to 45 dwellings associated infrastructure, ancillary facilities, open space and landscaping and construction of a new vehicular access off School Lane was submitted in February 2022 (s.22/O423/OUT). The planning application is accompanied by the requisite supporting documents. In February 2021, an application was also submitted for a larger scheme of up to 100 dwellings (S.21/O236/OUT) (which demonstrates that the site has capacity for more development than proposed in the Pre-Submission Plan.).

47.3 The LVIA has been prepared and has assessed the potential landscape and visual effects of development on land off School Lane. It concluded that the landscape sensitivity of the site itself is considered to be medium/low– due to the undesignated nature of the land and a limited number of landscape receptors of value and or rarity on site. The LVIA addresses whether any landscape impact is minimised. The illustrative layout plan conforms to and reinforces the existing settlement character and settlement pattern. Landscaping has been addressed and the illustrative masterplan shows both the existing vegetation and identifies additional planting. Native tree and shrub planting as shown on the illustrative proposals can improve connections to existing green infrastructure and help to integrate and anchor the development to its surroundings. In particular the tree planting and open space as proposed to the western boundary will strengthen the settlement edge creating a sensitive and well vegetated transition to the open rural landscape further to the west.

47.4 The LVIA states:

“Views of the site are largely contained to within the immediate vicinity due to containment by landform, existing built form and vegetation. Where the site is available in the view it typically forms part of a transient glimpsed view experienced for a short duration. Views are likely to be slightly more available during winter months

due to loss of deciduous vegetation. There are no predicted significant impacts on visual receptors within the Stroudwater Industrial Heritage Conservation Area (IHCA) which are largely obscured by changes in landform and layers of intervening vegetation and the proposals are set back from the ridgeline with an intervening buffer of tree planting to help filter views."

"In landscape and visual terms, the study site provides the opportunity to create a small extension to the existing settlement without creating unacceptable change to the character, pattern or setting of the village. The development will be contained within the overall existing settlement pattern and would not form a prominent encroachment into the adjoining rural landscape. As such this assessment confirms that no significant landscape and visual effects are predicted to the character of the rural landscape which forms the setting of the village and the Stroudwater Industrial Heritage Conservation Area. Some limited visual effects are likely to be experienced by residents of immediately adjoining dwellings and footpaths along the northern boundary but the development provides opportunity to mitigate this through the introduction of new planting that would conform and reinforce the desirable local landscape character. Enhancement to site green infrastructure can be delivered through the introduction of areas of public open space and native tree and hedge planting in accordance with the aspirations of both local and national policy."

- 47.5 It is not clear what the Council have in mind in respect of strategic landscaping as clearly each scheme and its landscape implications will be assessed on its merits. Strategic landscaping depends on the issues identified and what mitigation is required. Clearly a larger site would provide greater scope for landscape buffering if required.
- 47.6 The SALA EB19c (ref WHI005) confirmed that there is 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.
- 47.7 The Sustainability Assessment CD3b (ref WHI005) concluded that this site was screened out of the SALA heritage assessment as having no heritage impacts.
- 47.8 The Heritage Assessment (which included an assessment of cultural heritage) accompanying the planning application considered the built heritage comprising several designated heritage assets, including five Grade II listed buildings and the Rural Frome Character Area of the Stroud Industrial Heritage Conservation Area, and were identified to all lie outside, but within 500m of the site. The site was not considered to contribute strongly to the settings of any of the Grade II listed buildings or the Conservation Area and it was therefore considered that development would not harm the significance of any of these structures.
- 47.9 Waste water and public transport are considered through appropriate legislation and contributions. It is noted that the Council's summary of the representations (SLP-01a) in respect of Policy PS46 refers to concerns about increased pressure on existing inadequate waste water infrastructure in Whitminster and downstream in Frampton on Severn. As part of the preparation of the Local Plan all sites have been assessed with



the statutory bodies. Indeed, in response to the planning application Severn Trent have confirmed (11th March 2022) that they have no objections to the proposals provided that the following conditions are included:

- *“The development hereby permitted should not commence until drainage plans for the disposal of foul and surface water flows have been submitted to and approved by the Local Planning Authority, and*
- *The scheme shall be implemented in accordance with the approved details before the development is first brought into use. This is to ensure that the development is provided with a satisfactory means of drainage as well as to prevent or to avoid exacerbating any flooding issues and to minimise the risk of pollution.”*

47.10 In response to concerns about public transport. The Council have stated that Topic Paper – Transport October 2021 ((EB6) sets out the strategic context, including the Sustainable Transport Strategy (EB60), for delivering sustainable transport choices, prioritising active travel measures and improvement of public transport opportunities.

47.11 Development will deliver enhancements to the existing Public Right of Way to School Lane as a high quality and accessible route linked with the existing walking and cycling network.

47.12 The TA that supports the planning application for the site has considered the site’s accessibility to sustainable travel and included a review of pedestrian routes to key facilities; it proposed the following mitigation measures:

- new footway to connect site with existing provision on School Lane;
- improvements to pedestrian routes along School Lane comprising:
 - i. Tactile paving at the School Lane/Rickyard Way junction
 - ii. Dropped kerbs and tactile paving at the School Lane/The Close junction
 - iii. Dropped kerbs and tactile paving on School Lane arm at A38 crossroads.

47.13 PFA Consulting have prepared a response to highway matters raised by the Highway Authority in response to the planning application. Whitminster is identified as one of the few third tier (3a) settlements in the refreshed categorisation set out in the emerging Draft Local Plan and evidenced by the Council’s Settlement Role and Function Study Update (2018). Tier 3a settlements represent the most appropriate locations for future growth outside the higher tier settlements. Whitminster is on the ‘A38 Sustainable Movement Corridor’ identified in the ‘Stroud Sustainable Transport Strategy’ (November 2019) prepared by AECOM to enable people to access services and facilities elsewhere along the movement corridors.

47.14 Bus services in Whitminster on the A48 have recently be improved as a result of the committed development at Great Oldbury, West of Stonehouse (legally binding agreement). This has provided an additional half hourly bus service from Whitminster to Stonehouse and Stroud to the east and Gloucester to the north.

47.15 Service 64 currently runs every 30 minutes Monday to Saturday daytimes and hourly during the evenings and Sundays. It routes between Stroud and Gloucester via



Stonehouse, Whitminster and Quedgeley. The journey time from Whitminster to Stonehouse is approximately 15 to 20 minutes and Quedgeley is approximately 10 minutes on the bus. It takes approximately 30 minutes to travel from Whitminster to Gloucester Transport Hub on Service 64. This will provide residents of the proposed development with access to employment, retail and secondary education within the larger settlements in addition to those local services at Whitminster. By locating development on existing or potential high-quality public transport corridors represents some of the most sustainable options for any development strategy.

- 47.16 GCC has specifically referred to the reliance of the private car to secondary education. School bus services (Services C369AK & 346) are available from bus stops located on School Lane adjacent to Whitminster Primary School less than 200m from the proposed site. These provide services between Arlingham and Severnvale School and between Saul and Dursley Rednock School. These existing school bus services in addition to the A38 bus services described above will ensure residents of the proposed development will have the opportunity to travel to secondary education by sustainable modes and are not reliant on the private car.
- 47.17 In terms of highway capacity GCC have confirmed that given the site is allocated in the emerging Stroud Local Plan and the quantum of development is small, the resultant traffic increase on the local roads would be modest and therefore unlikely that the residual cumulative impacts on the road network would be severe.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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