

STROUD DISTRICT LOCAL PLAN EiP

Submission on behalf of SevenHomes

Matter 2 Spatial Strategy and Site Selection Methodology



1. The purpose of this Paper is to set out SevenHomes’s position in respect of the following Questions.

Vision and Objectives:

Question 1

2. As a whole, SevenHomes supports the Plan and its Visions for the future of the District. However, it wishes to make the following comments regarding the Plan’s aspirations for its rural communities.
3. In essence, SevenHomes feels that the Plan is missing the opportunity to support its range of diverse communities and their strong sense of identity. Part of this is achieved through carefully managed growth. In the case of Frampton on Severn and other settlements on that tier of the settlement hierarchy, the Plan seeks to limit development, despite clear evidence available in the Plan which highlights issues with the effectiveness of the housing market in such locations and therefore, their sense of vibrancy.

Question 2

4. The purpose of the Mini Visions is to set out an overall objective for each one of the various sub-areas. In the Case of Frampton on Severn, the Plan anticipates development to meet local needs and focus growth at a sustainable settlement. It is SevenHomes’s position that the Vision is disconnected from the Plan’s actual approach to this settlement, as will be detailed in responses to other questions. Essentially, the Plan’s Mini Vision is failing to set an appropriate context for Frampton on Severn’s housing allocations.

Spatial Strategy

Question 4

5. The SevenHomes position is that the Spatial Strategy is prepared on the basis of robust evidence, up to a point. In terms of the overall scope of the evidence provided to support the Plan, it is clear that considerable effort has been undertaken to cover a number of technical a social and economic issues regarding the spatial strategy and site selection and SevenHomes obviously supports the Plan in that respect.

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6. However, the issue is that the evidence base presents a limited picture on the sustainability of settlements. Paragraph 78 of the Framework requires policies to be responsive to local circumstances, supporting development which respects local needs. Document EB72 goes some way in providing that understanding and justifying the approach to development in Frampton but it is limited and SevenHomes wishes to highlight the following:
 - Paragraph 4.13 FoS is ranked 3rd highest in terms of economic activity
7. The economic performance is offset by the fact in Table 1, Frampton has only experienced 3% growth and this is classed as “very low”. In paragraph 3.39 of EB72, the document highlights the fact that the settlement “underperforms” when compared to other tier two locations (as it was at the time) and that “considerable growth and development” will be required. This anticipated growth was required to support its continued position as a Tier 2 location. However, the document considered that this might be unrealistic given “poor accessibility” and “environmental constraints”.
8. The obvious criticism of EB72 is that it has not been updated to reflect the actual settlement hierarchy proposed in the submitted Plan and relies on the previous Local Plan. It does show how some of the constraints were pre-determined into the submitted Plan, to the detriment of the longer-term viability of the settlement. A good example of this is the Council’s approach to the allocation PS44 and the evidence base (SALA EB20C) supporting such a decision to allocate the site. EB20C highlights the suitability of the site for development and considers that the site can deliver up to 80 homes. However, in allocating the site, whilst being aware of the Plan’s wider objectives, the Plan under allocates in only providing for 30 dwellings, when the SALA shows that it can accommodate significantly more.
9. The above has served to demonstrate that the Evidence Base for the Plan has highlighted an issue with the vitality of Frampton in terms of housing affordability, low churn rate of the housing market in the village and a low level of population/household growth. These are indicators of a settlement struggling with viability as housing becomes increasingly unaffordable and unavailable for local people. In response, the Plan barely seeks to address these problems, by proposing a level of housing allocation commensurate with what was achieved under the previous two Local Plans. Such an approach is not supported by site specific evidence, which shows that there are opportunities for sites to come

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forward in the village which can deliver increased levels of growth and the prime candidate for this is SevenHomes's site at Frampton, PS44.

Question 5

10. SevenHomes is not convinced by the Plan's heavy reliance on a small number of strategic delivery sites, including two new settlements. Whilst there may be a numerical argument for such sites, namely the ability to deliver a large quantum of housing in a handful of locations, the Plan fails to appropriately justify this based on evidence.
11. In terms of evidence, the primary source of the justification of the development strategy is detailed in Section 4 and Appendix 8 of the SA. This points to a new settlement/growth point strategy, based on a strategy of finding the least environmentally constrained areas of the district and focusing considerable levels of development in those locations as a means of meeting objectives such as:
 - Reducing the need to travel (especially by private car)
 - Providing significant quantities of affordable housing
 - Avoiding policy conflicts regarding the potential expansion of settlements or areas of settlements in environmentally more sensitive locations.
12. Whilst these issues are recognised as legitimate planning objectives, SevenHomes is concerned that there is insufficient justification for such an approach and the Plan and strategy could have worked 'harder' to deliver intensified levels of development at other locations (such as at Frampton).

Question 6

13. SevenHomes is concerned that there is a disconnect between the spatial strategy and the settlement hierarchy and scale of development proposed outside of strategic allocations. Given the low level of development (11% at non-strategic allocations) the Strategy does not accord with the objectives of the Plan, which seeks to support development at Large Villages (2.3.8 of the Local Plan) such as Frampton on Severn.

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14. In terms of the Plan's overall approach, out of a total of 9,065 dwellings allocated as listed in Policy CP2 and discounting the 3,000 reserved to meet Gloucester's needs, the following is noted:

- 8080 is directed to strategic allocations
- Out of the 985 remaining
- 185 is allocated to Tier 1 locations (3 locations)
- 360 is allocated to Tier 2 locations (4 locations)
- 440 is allocated at tier 3A locations (7 locations)

15. Outside of strategic sites, it is clear that Tier 3A locations, such as Frampton on Severn secure the majority of the housing requirement. However, this only represents 4.8% of the overall number of homes allocated in the District. Such a small percentage does not mirror the objectives in paragraph 2.3.9 of the Local Plan.

16. Specifically referring to Frampton on Severn, the total number of dwellings allocated to the settlement in Policy CP2 (30 dwellings) equates to 0.3% of the Plan's overall allocation for the District. From a policy standpoint, Core Policy 3 considers that housing at Tier 3A locations are to:

"Principally meet specific local housing, employment and community infrastructure needs, with a view to safeguarding or enhancing each settlement's current role, function and accessibility."

17. SevenHomes takes the position that the scale of development proposed at Frampton on Severn does not reflect the objectives of CP3 and its position in the settlement hierarchy as well as the strategy proposed. This is because it does not provide for enough housing in the village for the Plan period.

18. SevenHomes's concerns are articulated in the evidence base for the Plan in Document EB72, which is the most up-to-date source of data on the various settlements in the District. Although, the document has not been updated to reflect the Settlement Hierarchy in the emerging Local Plan. The narrative in the document is that Frampton on Severn is

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a Tier 3A location which has experienced one of the lowest level of growth in the District, relative to its size.

19. Taking the 2018 figure of 593 dwellings in the village, the following should be noted:

- Since 2011 to 2018 – the number of houses in the village has increased by only 2%.
- Housing Churn Rate (an expression of the activity in the housing market) is at 0.01%, the lowest for any Tier 3A location.
- There are clear issues with housing affordability and the affordability gap in the village.

20. The aspirations of the Plan’s strategy and CP3 have set out a positive framework for looking to address housing supply in villages and support the vitality and viability of existing rural communities. Such an approach reflects paragraph 78 of the NPPF. SevenHomes is disappointed to note that whilst its site in Frampton is allocated for housing development it does not look to provide a step change in the level of development directed to the village to support the aspirations of the Plan’s strategy or the objectives of Policy CP3. On the contrary, the approach of the Plan to Frampton on Severn can be classified a “business as usual” promoting a level of growth which equates to 5%, a low figure when compared to other Tier 3A locations. This conclusion has been reached as follows:

Tier 3A Settlement	Total Number of Houses (source EB72)	Allocations in Local Plan	Percentage Increase
Brimscombe	1049	190	18
Frampton on Severn	593	30	5
Hardwicke	1965	10	0.5
Kingswood	575	50	8.6

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Leonard Stanley	733	40	5.5
Newtown	705	70	9.9
Whitminster	391	50	12.7

21. In terms of the data, Hardwicke is an outlier by virtue of the fact that it also has a strategic allocation for 1,350 dwellings attached to it. Leonard Stanley by comparison grew by 15% between 2011 to 2018 compared to the 3% Frampton on Seven did over the same time.
22. The strategy is inconsistent with the settlement hierarchy in terms of its treatment of Frampton on Severn and the scale of development directed to it. In rectifying this issue, SevenHomes’s position is that the level of development at Frampton on Severn should be increased to 80 dwellings which would equate to a 13.5% increase in the size of the settlement, commensurate with the levels of growth projected at Whitminster and would not be a disproportionate level of development for the settlement.

Question 11

23. SevenHomes’s position is that the proposed strategy does not do enough to support a prosperous rural economy by limiting development in Tier 3A locations to less than 5% of the total number of dwellings allocated in the Plan. Table 8 of EB72 shows that Frampton has a ratio of 1.04 jobs per 1 worker and is a net importer of workers into the Parish. Additional housing development in the village will assist in maintaining the village’s economic performance. By limiting the level of additional housing in Tier 3A locations, especially at Frampton, it is handicapping the economic performance of the settlement, contrary to national guidance.

Question 15A

24. SevenHomes is supportive of the settlement hierarchy, as set out in the Plan. However, in terms of the hierarchy, decisions about the extent of the Frampton allocation are made on the potential coalescence between Frampton on Severn and the alleged hamlet of Oatfield (see EB20C FRA004). In EB72 and the Plan, no reference is made to Oatfield and therefore, it is not recognised in the Plan or the evidence base assessing settlement

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hierarchy as a ‘settlement’ for the purposes of setting out the development strategy of the Plan.

25. The fact that Oatfield is not a settlement (historic or otherwise) is further qualified by reference to a planning application for a new dwelling at a property called the Hollies, located in the cluster of houses referred to as Oatfield (SDC ref S.14/1986/FUL). The Officer’s Report refers to the site as follows:

“The site is located outside the defined settlement boundary, however it is located in close proximity (approximately 270 m). The site is not so detached from the settlement of Frampton that it could be considered unsuitable.”

26. The point here being that the Officer’s Report is referring to the site in relation to Frampton and not Oatfield.
27. This gives a disproportionate level of weight to the status of Oatfield, which is totally unjustified in terms of the requirements of the NPPF.

Question 18

28. No – Document EB72 details the current role and function of a number of settlements across the District. However, it does not detail the likely impacts of the significant levels of development being proposed at the strategic sites. This omission is especially pertinent considering the volume of development taking place along the A38 corridor.

Question 28

29. SevenHomes clearly support the allocation of PS44 in the Plan. However, in terms of the site selection process, it questions whether the decision to only allocate part of the site has been ‘suitably informed’ by relevant assessments. In EB9, paragraph 2.5.9 final bullet point on the top of page 39, reference is made to the site area being reduced for ‘landscape impacts’. However, there is no corresponding evidence document to demonstrate that the decision to reduce the overall level of development compared to the SALA conclusions is justified.
30. As part of SevenHomes’s promotion of the site, the wider land parcel in which the allocation sits is the subject of an outline planning application for up to 80 dwellings. The

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Conservation Officer's response to the application (**appended**) shows that there is limited visual impact and that it is unlikely to cause any harm to the conservation area.

Consultee Comments for Planning Application

S.22/0285/OUT

Application Summary

Application Number: S.22/0285/OUT

Address: Land At Whitminster Lane Frampton On Severn Gloucestershire

Proposal: Outline application for the construction of up to 80 dwellings and ancillary works with all matters reserved except access

Case Officer: Simon Penketh

Consultee Details

Name: Conservation Specialist

Address: Ebley Mill, Ebley Wharf, Stroud, Gloucestershire GL5 4UB

Email: Not Available

On Behalf Of: Conservation South Team

Comments

APPLICATIONS WITHIN OR AFFECTING THE SETTING OF A CONSERVATION AREA

Case Officer: Simon Penketh

Ref: S.22/0285/OUT

Thank you for consulting the Conservation Officers on this matter.

We would like to make the following comments:

The above site is situated adjacent to the Frampton on Severn and Saul Conservation Areas. Special attention must be paid to the desirability of preserving or enhancing the character and appearance of the area.

This proposal is for the erection of up to 80 dwellings on land at Whitminster Lane. The land is separated from the Saul conservation area by the canal and from the Frampton conservation area by a modern housing development. Therefore the visual impact on either area will be limited. The proposal is unlikely to cause any harm to the character of the conservation areas. The application has been assessed in accordance with Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Paragraph 202 of the Framework states that any less than substantial harm should be weighed against the public benefits of the proposal.

DSG