



TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (LOCAL PLANNING)
(ENGLAND) REGULATIONS 2012

STROUD DISTRICT LOCAL PLAN REVIEW – DRAFT PLAN FOR CONSULTATION

REPRESENTATIONS ON BEHALF OF [REDACTED] and [REDACTED]
CONCERNING LAND NORTH-WEST OF WHITMINSTER LANE, FRAMPTON ON SEVERN (Allocation PS44 on pages 128 – 129 of the Plan)



PREPARED BY
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1.0 INTRODUCTION

- 1.1 The Stroud Local Plan was adopted in 2015. It identifies the housing, employment, retail and community development that is required to meet local needs in the period to 2031. It sets out the strategy for distributing development within the District and policies for protecting and conserving the natural and built environment.
- 1.2 Stroud District Council started a review of the Local Plan in 2017, in line with new Government requirements that local plans should be updated every five years. The review provides an opportunity to update the plan in the light of the revised National Planning Policy Framework (the Framework) and other material changes in circumstances since the preparation and adoption of the initial Plan. This includes the need to accommodate greater housing numbers over the next 20 years i.e. an extended plan period to 2040.
- 1.3 The *Local Plan Review: Draft Plan* was issued for public consultation in November 2019 and invites engagement and views which will be used to finesse the Plan prior to its submission for public examination and ultimate adoption. The Draft Plan explains that the consultation is aimed at understanding three broad sets of questions:
- *Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?*
 - *Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?*
 - *Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?*

Source: Page 2 of the Draft Plan November 2019

- 1.4 The representations set out in this document are made on behalf of [REDACTED] and [REDACTED] (the Landowners) who own open land north-west of Whitminster Lane in Frampton on Severn. In the Draft Plan, this site is allocated for a development of 30 dwellings and associated community and open space uses.
- 1.5 The Landowners support the allocation of this site for development and this document sets out the details of their support and offers some suggestions for fine tuning the policy content, to achieve the best outcome for Frampton on Severn.

2.0 STRATEGY

- ***Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?***

- 2.1 The Landowners broadly support the preferred strategy for meeting future growth and development needs. The preferred development strategy is a sensible and evidence led 'hybrid' of the four Options that were set out in the 2017 'Issues and Options' consultation.
- 2.2 In particular, the Landowners support the strategic approach of promoting modest levels of growth at larger villages that have a range of local services, such as Frampton on Severn.
- 2.3 This strategy is considered to be sustainable, soundly based and appropriate, and will address a weakness in the existing Plan, which is premised on concentrating growth at a few locations, whilst unduly limiting growth in mid-tier settlements through settlement boundaries and the existing Plan's 'exceptions' based Policy CP15 regime.
- 2.4 With specific regard to Frampton on Severn, this large village has a good range of local community services and facilities, including a school, shopping, pubs, a wide range of sports clubs, playing fields, post office, doctors' surgery, village hall and notable local employment uses.
- 2.5 In the 2015 Local Plan, Frampton was classed as a Tier 2 settlement, but it effectively adopted a 'no growth'¹ policy regime, applying a strict settlement boundary approach and including no new housing allocations. This regime resulted in a negligible number of new houses being constructed in the village. Indeed, the Council's evidence base² confirms that Frampton has experienced **very low housing growth** of 3% between 2011 and 2018, which is well below the District-wide rate of growth (6%).
- 2.6 However, the Draft Plan's strategy recognises the appropriateness of planning for modest levels of growth in Frampton on Severn and other similarly sized villages which enjoy good local services and facilities. This element of the strategy, including the evidence based classification of Frampton as a Tier 3a settlement, is fully supported and is considered to be in line with the Framework's policy approach as set out in its Chapter 5. It will allow new homes, including affordable housing, along with other community benefits, which will enhance and support the vitality and sustainability of this large village.
- 2.7 Accordingly, the Landowners confirm their support for the preferred strategy set out in the Draft Plan.

¹ The Stroud Local Plan 2015 used the term 'minimal levels of development' at paragraph 3.78

² Stroud District Settlement Role and Function Study – Update 2018

3.0 PROPOSED SITE PS44 – LAND NORTH-WEST OF WHITMINSTER LANE

- ***Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?***

General

- 3.1 The Landowners fully support the allocation of their land, under PS44, for modest scale housing development and community and open space uses.
- 3.2 Whilst Frampton on Severn is a substantial sized village with a good range of services, the Draft Plan correctly recognises that there are physical and environmental constraints. The Conservation Areas covering the village and the canal, flood zone designations and landscape and wildlife sensitivities, all create constraints to future growth options.
- 3.3 However, the Draft Plan identifies the preferred direction of growth to the north-east of the village, through the PS44 site allocation. This is evidence-led and soundly based. It recognises that the Landowners' site is relatively constraint free.
- 3.4 Indeed, it is not within the designated Conservation Area and there are no adjacent heritage assets. It is all within Flood Zone 1, being the area of lowest flood risk, and most suitable for development. It also has limited landscape and wildlife value. Moreover, it enjoys an excellent location with easy access by walking and cycling to services and facilities within the village.

PS44 – Site Constraints

- 3.5 A man-made constraint that will need to be considered in the development layout relates to power lines that cross limited parts of the site. This will influence the layout of the development if they are required to be 'worked around' or, alternatively, modified / repositioned, subject to this being pragmatic and viable. In this regard, the Draft Plan site allocation, covering the whole landholding, is helpful and sensible, as it allows a range of site layout options to be explored.

PS44 – Needs (Housing)

- 3.6 The Landowners are keen to ensure that the development contributes positively to the needs of the village. The provision of 30% affordable housing, in line with Policy CP9, will contribute to local housing needs and will provide opportunities for people of all ages to remain in the village and contribute to its sense of community.

3.7 However, the Landowners recognise that in addition to a proportion of affordable homes, the mix of the market homes element is also important. Whilst developers may gravitate towards a greater proportion of larger 'executive' homes, it is considered important to include smaller 2 and 3 bedroom homes in the housing mix. The Landowners support a requirement to provide an appropriate mix of dwelling types and sizes, in line with Draft Plan Policy CP8.

PS44 – Opportunities (Community and Open Space Uses)

3.8 Following the publication of the Draft Plan, the Landowners instructed their agent to undertake exploratory discussions with local bodies to inform potential opportunities for community and open space uses.

3.9 Consultation with the following bodies has been undertaken:

- Frampton on Severn Parish Council
- Frampton on Severn Community Association
- Frampton Surgery
- Frampton on Severn Tennis Club
- Frampton on Severn Cricket Club
- Frampton on Severn Football Club

3.10 Based on this initial exploratory engagement, the following feedback has been established:

- Cricket and football sports are well catered for in terms of pitches and no expressions of interest have been made for further pitch provision.
- There is no stated demand for additional allotment facilities, as there are existing plots which meet that need.
- There is an interest and demand from the tennis club for land to establish a fourth tennis court and ideally secure vehicular access and some parking to serve the club.
- There is interest from the Community Association for land to create an expanded existing (or new) recreation area, which could include a multi-use games area.
- Recreational routes through the land, which might include an occasional running circuit (for Parkrun type events), would be welcome.
- The Frampton Surgery has indicated a desire to explore the possibility of its two charities (The Pinching Trust and the John Buckley Memorial Trust) securing land for a 'community garden' for use by all of the local village community and patients of the practice. It considers that this would be of benefit to the community as a whole and would

include easy access, raised beds for wheelchair use, shade cover and seating areas.

- 3.11 This initial consultation exercise has been extremely helpful in terms of defining the community and open space use element of the development. It is clear that playing pitches and allotments are not required, but there is a clearly expressed demand / interest for additional recreation ground space, including land for multi-use games and tennis courts and associated parking / access, along with the possibility of a charity run community garden.
- 3.12 The Landowners can confirm that they are, in principle, supportive of the idea of making land available for the desired facilities. However, the capital works for the creation of the facilities would sit with any recipient body (some of which have indicated an availability of funds and access to grants).
- 3.13 The Landowners are happy for Stroud District Council to reflect the above indications and 'in principle' agreements in its PS44 Policy wording and / or the companion narrative (see section 4).

4.0 POLICY / SUPPORTING TEXT WORDING

- ***Are any further changes to the proposed policies necessary?
Are there specific things that should be included in supporting text?***

4.1 The Landowners offer the following suggestions concerning the draft supporting text and policy wording.

Supporting text

4.2 Page 128 refers to access to key services and facilities elsewhere being 'very poor'. The Landowners would question this statement, given that Frampton on Severn is closely connected to the A38 / M5 corridor, which gives residents relatively good proximity to higher order centres and services such as secondary schools, hospitals, town centres and major employment locations, notably at Stonehouse, Stroud, Quedgeley, Gloucester, Cam and Dursley. This statement should be reconsidered and revised.

4.3 Page 128 also labels Frampton a 'dormitory settlement' but this does not accurately reflect its long tradition as a village community, with a strong identity, and the fact that it includes significantly more employment than many similarly sized villages. It is suggested that this reference is removed or revised.

PS44 wording

4.4 The Landowners note that the Draft Plan includes very specific housing unit numbers for the site allocations. Whilst the quantum (30) is broadly supported, applying seemingly precise numbers appears to be overly prescriptive. On some sites, detailed constraints may limit the ability to achieve stated numbers. On other sites, a slightly higher number may be appropriate to achieve the best outcome, e.g. a housing mix tailored to local circumstances might be supported with a slightly higher number of homes. It is suggested that using the precursor 'around' or 'about' [30 dwellings] would address this concern and allow for some limited flexibility.

4.6 As noted above (paragraph 3.13), the Landowners are happy for Stroud District Council to reflect the findings of the initial exploration of community uses in its PS44 Policy wording and / or the companion narrative. This can include reference to the provision of land for new outdoor recreation space, with the potential to incorporate a tennis / multi-use games court facility, and a potential community garden.

4.7 However, the Landowners suggest that sufficient flexibility is maintained in the wording and that the detailed scheme content and layout are all to be agreed through the development brief / masterplan process.

4.8 It is also suggested that the policy wording could include some reference to the Frampton on Severn Community Design Statement (Autumn 2018). The Landowners are more than happy to accept a policy requirement that any detailed scheme has regard to the design principles set out in the Statement.

5.0 CONCLUSIONS

5.1 The Landowners support the Draft Plan's strategy with particular regard to its identification of land north-west of Whitminster Lane for a limited expansion of the village under PS44. It will allow for modest and proportionate growth in a sustainable location. It will help address the past low growth rate in Frampton on Severn, and deliver a range of new homes, including affordable housing and market homes to meet the needs of young families and smaller households.

5.2 The Landowner's local knowledge and engagement has identified a number of opportunities for community and open space uses which can be directly facilitated by the development. These opportunities can be reflected in a finessed and evolved version of Policy PS44 and its supporting text.

5.3 Subject to reference to these informed opportunities and other suggestions to fine tune the text, the Landowners endorse and support the allocation and its policy. It will form the basis for a sustainable village extension which will deliver some significant and tangible benefits for Frampton on Severn and its community.

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20 January 2020