

REPRESENTATIONS ON THE
STROUD DISTRICT LOCAL PLAN REVIEW
DRAFT PLAN

LAND AT JAXONS FARM, HYDE LANE, WHITMINSTER

ON BEHALF OF REDROW HOMES LIMITED

JANUARY 2020

**Representations on the
Stroud District Local Plan Review
Draft Plan**

Barton Willmore
Greyfriars House
Greyfriars Road
Cardiff
CF10 3AL

Tel: 02920 660 910

Ref: 30062/A3/JA
Date: January 2020

Email: cardiff@bartonwillmore.co.uk

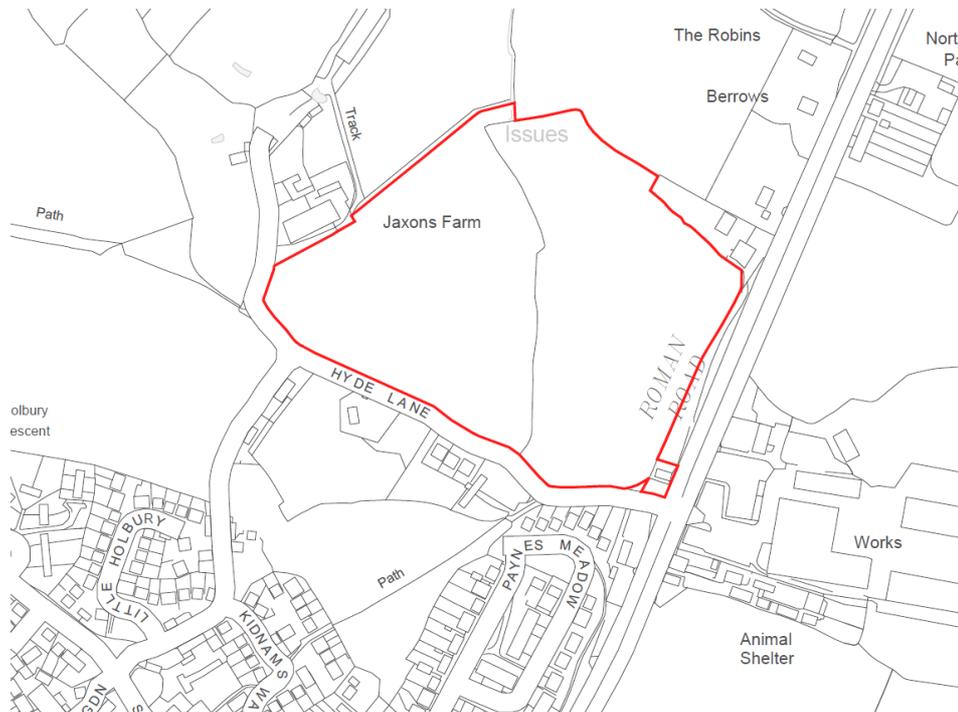
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1.0 INTRODUCTION

1.1 These representations are submitted by Barton Willmore on behalf of Redrow Homes Limited to the Stroud District Local Plan Draft Plan for consultation in respect of land at Jaxons Farm, Hyde Lane, Whitminster – see site plan below.



1.2 The site sits to the north of Hyde Lane and to the west of the A38 on the northern suburban fringe of Whitminster. The site does not include any statutory or non-statutory designations that would preclude its residential development should the emerging planning policy context in the Local Plan allow for it. The site is approximately 7.5 hectares and has the potential to accommodate approximately 200 homes. The Council have referred to the site as 'Land at Jaxons Farm (Online Site Ref 20: Local Plan Review: Emerging Strategy List & SALA Ref: WHI010), although the boundaries of the site have since been amended.

1.3 This report follows the structure of the Council's consultation survey pages and is therefore set out as follows:

- Chapter 2: Policies Survey - provides comments on Core and Delivery Policies in Sections 2.9, 4.0, 5.0 and 6.0;
- Chapter 3: Other Sections: provides comments on all areas of the Draft Plan except policies and proposed site allocations;

- Chapter 4: Sites Survey – provides comments on proposed site allocations and supplementary information on Land at Jaxons Farm, Hyde Lane, Whitminster.

1.4 The following documents are enclosed:

- Site Location Plan, 9000, Barton Willmore, January 2020;
- B05128-T-SK01A-Whitminster, Access Proposal, clarkebond, September 2019;
- B05128-T-SK02A-Whitminster Access - Vehicle Tracking – Refuse, clarkebond, September 2019;
- B05128-T-SK03A-Whitminster Access - Vehicle Tracking - Fire Appliance, clarkebond, September 2019;
- B05128-T-SK04A-Whitminster Access Visibility, clarkebond, September 2019;
- B05128-T-SK05A-Whitminster Access Proposal, clarkebond, September 2019;
- B05128 - Walking Isochrones, clarkebond, January 2020;
- B05128 - Cycling Isochrones, clarkebond, January 2020; and
- Ecological Constraints and Opportunities Plan, Green Ecology, January 2020.

2.0 POLICIES SURVEY

Core Policy CP2 - Strategic growth and development locations: Object

Level of growth attributed to Whitminster

- 2.1 Core Policy CP2 allocates housing growth of 40 homes to Whitminster over the next 20 years to 2040. This does not reflect the sustainable role it plays in the settlement hierarchy, particularly when viewed as part of its wider context and relationship with Stonehouse (with an extensive range of services and facilities). With decreasing household size, the proposed strategy for Whitminster (i.e., limited additional housing development) would lead to an unsustainable level of growth. Whitminster is a sustainable settlement on its own merits (as set out in our response to Core Policy CP3) and should include additional development to serve its housing needs, currently unaddressed in the Draft Plan.
- 2.2 By way of illustration, based on data provided in Table 1 of the 2018 Settlement Role and Function Study, the table below shows that over the period 2018 – 2039, the population is predicted to increase by only 95 persons.

	Whitminster
A. Population 2011 (census)	890
B. No. of dwellings 2011 (census)	367
C. No. of dwellings built 2011 – 18 (taken from table 1 of settlement study 2018)	24
D. Total number of dwellings 2018 (B + C)	391
E. Population 2018 (D x 2.27 ¹)	888
F. Planning permissions not yet implemented (taken from table 1 of settlement study 2018)	33
G. Potential for housing within settlement boundary (SALA) ²	0
H. New housing allocations through Draft Plan	40
I. Total dwellings in 2040 (D+F+G+H)	454
J. Total population in 2040 (I x 2.17 persons per household) ³	985
K. Population change 2011 – 2040 (J – A)	95

- 2.3 The level of growth is not considered sufficient to support a strong and vibrant community at Whitminster and therefore does not accord with Paragraph 8(b) of the NPPF. Whitminster has far greater capacity for development than is currently allocated (as is evidenced through the submissions made in respect of Land at Jaxons Farm, Hyde Lane) and would assist in facilitating delivery of enhanced public transport. To exclude

¹ MHCLG 2014 based household projections: 2019 average household size in Stroud 2.27 persons per household.

² Looking at the 2017 Strategic Assessment of Land Availability and its 2018 and 2019 updates, there are no sites identified within the settlement boundary at Whitminster as being deliverable and developable

³ MHCLG 2014 based household projections: average household size in Stroud is projected to decrease from 2.27 in 2019 to 2.17 in 2039.

otherwise sustainable development at the plan-making stage would not accord with the soundness test of “justified”.

2.4 We do not consider that the Sustainability Appraisal (SA) of the Draft Plan (November 2019) for Policy CP2 (provided at Table 4.4 of the SA with commentary at Paragraphs 4.60 – 4.71) has appropriately accounted for the potential negative effects of the proposed development strategy for Whitminster on social objectives. Given the limited growth strategy for Whitminster, negative performance against the SA housing objective, as well as the services and facilities and vibrant communities objectives would be expected. The very limited housing growth proposed in Whitminster could potentially impact on vibrancy of services and facilities and cause localised housing supply issues and associated house price increases. The SA has not accounted for the potential negative effects of the proposed development strategy for Whitminster on these social objectives. Such negative effects should similarly have been identified within the SA of Policy CP2 (provided at Table 4.4 of the SA with commentary at Paragraphs 4.60 – 4.71) – not least given the findings of the 2018 Settlement Study, which outlines the need and benefits of growth at Whitminster *‘to maintain diversity and demographic vitality’* (Paragraph 2.51). Further commentary on the SA

Sustainability Appraisal

2.5 By way of background, to date, the SA of alternatives has considered:

- SA of the four strategic growth options⁴ at the Emerging Strategy stage (SA November 2018)
- SA of all proposed development sites, as well as those discounted at the Emerging Strategy stages (SA November 2019)

2.6 As part of the SA of the Draft Plan there has been no assessment of alternative growth options at Whitminster – there has therefore been no consideration of the sustainability affects of allocating more than the 40 units currently proposed for the settlement over the plan period. The Emerging Strategy SA (November 2018) considered the four strategic growth options but overlooked the spatial impacts of these options on different parts of the plan area. The SA considered widespread impacts across the District – making the assumption that higher levels of concentration perform better against most of the SA objectives when compared with option 2 (some dispersal) which was considered

⁴Option 1 – concentrated development at the district’s main towns; Option 2 – wider distribution of housing and employment at the edge of larger villages and main towns; Option 3 – Dispersal of development so that most villages had at least one small-medium sized site; Option 4 – growth point (i.e. new settlements).

to perform less well. These high level assumptions have been applied without any geographical / spatial considerations in terms of SA performance across different parts of the plan area and this appraisal bias has impacted upon the level of growth attributed to settlements. As previously set out, limited growth in settlements (such as Whitminster) could be detrimental to social objectives – but this has not been brought out in the appraisal of the strategic options in the November 2018 SA or the SA of the mini visions (November 2019) (discussed later) and therefore, these potential impacts have not been explored in the sustainability appraisal.

Overreliance on Sharpness & Wisloe

- 2.7 The Draft Local Plan development strategy proposes two new settlements to be located at Newtown/Sharpness and at Wisloe within the Severn Vale (A38/M5 corridor). A total of 4,200 dwellings are allocated between the two areas – with Sharpness docks and Sharpness garden village providing 2,700 dwellings and Wisloe providing 1,500 dwellings within the plan period. We consider that there is a significant risk that there is an overreliance on these two sites to deliver a significant proportion of the District’s required growth.
- 2.8 We comment in greater detail on the sites themselves within Chapter 4 of these representations, but would initially note that the Sharpness site was assessed in the 2017 SALA as having significant constraints. These included the site currently being in many different ownerships, the SAC/SPA/RAMSAR close to the site and high landscape sensitivity in parts and the need for a wider development strategy for the area. Such constraints would inevitably delay plan preparation and whilst the promoters accept that the site cannot deliver its nominal capacity within the plan period, any delay would result in the capacity that can be realistically accommodated within the plan period decreasing. We would additionally query deliverability of the sites (particularly given land control) and we comment on concerns raised in respect of the sustainable transport strategy later in these representations.
- 2.9 In addition to the above, issues associated with infrastructure delivery (and associated delay to delivery of dwellings) and market suppression in a relatively untested housing market location could further decrease the realistic yield of the site within the plan period. The redevelopment of Sharpness docks and the proposed new settlement at Wisloe (being only 4 miles away as the crow flies) would further reduce the annual dwelling output due to market saturation with all sites being within a similar travel to work area and thus competing in a very similar housing market in a relatively isolated area.

- 2.10 Accordingly, readily available sites being promoted by developers with realistic prospects of delivery that are not reliant on significant infrastructure delivery should be allocated to ensure that that the Local Plan's housing requirement can be met.
- 2.11 Paragraph 2.27 of the Draft Local Plan recognizes that proposed delivery rates are above what has been achieved historically, coupled with the allocation of complex brownfield sites and two new settlements with the Draft Local Plan stating that this is 'an ambitious undertaking'. It is therefore states that the Council '*may need to identify additional reserve sites, should the sites identified in this document not come forward at the rates envisaged*'. Whilst we consider that Land at Jaxons Farm, Hyde Lane, Whitminster should be allocated in its own right (for the reasons outlined in these representations), on a without prejudice basis we would note that Whitminster is a sustainable settlement that could accommodate reserve allocations to counter the over-reliance on Sharpness and Wisloe. In order to be flexible, additional land should be identified at Whitminster.
- 2.12 In summary, the Draft Local Plan's strategy (as currently drafted and proposed through Core Policy CP2) is over-reliant on new settlements at Sharpness and Wisloe that are unlikely to deliver the required number of dwellings in the plan period. Land at Jaxons Farm, Hyde Lane, Whitminster is suitable, available and achievable and should be allocated to contribute to the delivery of housing in the district, and to address the needs and vision for the Severn Vale.

Core Policy CP3 - A hierarchy for growth and development across the District's settlements: Object

- 2.13 Core Policy CP3 classifies Whitminster as a Tier 3a settlement, described as follows:

"These medium-sized and large villages are generally well-connected and accessible places, which provide a good range of local services and facilities for their communities. These villages benefit from their proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere, and which may offer some scope for further transport and accessibility improvements. These are relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self-containment. Some of these settlements outside the AONB may have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements. However, their scope for future growth (in addition to any sites already allocated in this Plan) is constrained." (Draft Plan, page 50)

- 2.14 The 2018 update to the Stroud District Council Settlement Role and Function Study (2014) is not provided as a Background Paper to the Draft Plan but was completed subsequent to the Emerging Strategy consultation. Nevertheless, the study and its update demonstrate the sustainable attributes of Whitminster. Some of the Key findings in respect of Whitminster are summarised below.

Public Transport and Accessibility

- 2.15 Whitminster benefits from being located on the A38 corridor and therefore includes a number of bus stops, which provide for a range of regular service provision. This includes the following services:

- 2 - Arlingham - Saul - Frampton - Whitminster - Epney - Severnvale School;
- 6 - Arlingham - Frampton - Eastington - The Stanleys - Maidenhill School;
- 60 - Gloucester - Dursley - Wotton-under-Edge - Thornbury – Bristol;
- 72SV - Severnvale Shopper;
- 167 - Quedgeley - Nympsfield - Dursley Rednock School;
- 242 - Arlingham - Stonehouse – Stroud;
- 346 - Saul - Frampton on Severn - Eastington - Rednock School Grounds;
- 401A - Epney - Leonard Stanley - King's Stanley - Stroud High & Marling Schools; and
- PA1 - Whitminster - Quedgeley - Abbeymead - Sir Thomas Rich's & Pate's Grammar Schools.

- 2.16 Public transport provision should evolve over the plan period with enhancements to bus services proposed through the Public Transport Corridor Strategy to be delivered through Delivery Policy DEI1. The A38 corridor is identified as one such corridor that will benefit from a Movement Corridor Package within the Stroud Sustainable Transport Strategy (AECOM, November 2019). The Strategy states:

"The approach to this corridor should ensure that surrounding settlements, such as Whitminster, Eastington and Berkeley, can access these express services by sustainable modes if possible and ensure that they do not compromise the express nature of this service."

- 2.17 Delivery Policy DEI1 states that *"Pump-prime funding for these measures will be sought from developer contributions"*. The A38 corridor (wherein Whitminster is located) therefore represents a significant opportunity for further development that can align and help support enable the delivery of enhanced service provision. Further development in this location can help facilitate and enable further service provision through increased

patronage and contributing to the critical mass required to ensure enhanced bus services are deliverable. This is recognised within Stagecoach West's response to the Regulation 18 consultation (Representor ID 00594, dated 18th January 2019) at Question 4c which supports further growth at Whitminster.

Community Services and Facilities

2.18 Table 4 (page 27) of the Stroud District Settlement Role and Function Study Update (2018) indicates that Whitminster has a local retail provision score of 3 putting it on par with Stroud, which comprises a Tier 1 settlement.

2.19 Table 5 (page 30) states that Whitminster has 4 of the 5 local facilities, including:

- Village hall/event space/community centre;
- Pub;
- Playing field / sports pitch; and
- Childrens play area (equipped playground).

2.20 However, we note that in addition to the services and facilities surveyed, the Church of St Andrew, Whitminster is also used by residents of the village. A mobile service post office also operates by the Royal Mail at Whitminster.

2.21 For strategic facilities, Whitminster lies within proximity Frampton on Severn (which includes a library) and to Stonehouse which includes all strategic facilities with the exception of a hospital and a swimming pool.

2.22 Table 6 of the Council's Settlement Study (2018), which looks at accessibility based on travel times, rather than settlement limits, demonstrates that Whitminster has better accessibility when compared with Frampton on Severn (which comprises a Tier 2 settlement). Whitminster's ease of access to services based on travel time will further improve upon implementation of the A38 public transport corridor (proposed through Delivery Policy DEI1).

Employment and Travel to Work

2.23 The Settlement Study Update (2018) shows that Whitminster has a strong employment role. There are almost 700 jobs in the locality, which gives the community a very healthy ratio of 1.41 jobs per economically active resident: it is a net importer of workers.

- 2.24 Whitminster additionally has a relatively high rate of economic activity with Para. 4.12 stating:

"Whitminster is an exception. Despite its relatively small population, it had an above-average rate of economic activity (76%), above-average rates of employment, and a below-average proportion of retired people amongst its economically inactive population in 2011."

Summary

- 2.25 Overall, Whitminster has good accessibility to local services and facilities (primary school, post office, community hall, and children's play space/playing pitch – plus a pub, church and a local shop). The settlement has good access to a variety of employment close by, and has a jobs surplus, acting as an employment hub. Whitminster's location on the A38 corridor should be recognised and the opportunity for development here to capitalise on and support enhanced public transport provision should be harnessed.
- 2.26 Whitminster should therefore have tier 2 status cognisant of the range of facilities it includes along with its location on the A38 corridor. Land at Whitminster is suitable for residential development and accordingly housing should be allocated within the Local Plan (as per our response to Policy CP2 above) – which would provide the settlement with a greater critical mass and capitalise on the location's sustainability credentials.

Core Policy CP4 - Place Making: Support, subject to changes listed below

- 2.27 Core Policy CP4 states that all development proposals shall accord with the Mini Visions. We have commented on the Mini Vision outlined for the Severn Vale within Chapter 4 of these representations.

Delivery Policy DEI1 - District-wide mode-specific strategies: Support

- 2.28 We are fully support the provision of Public Transport Corridor Strategy to be delivered through Delivery Policy DEI1. The A38 corridor is identified as one such corridor that will benefit from a Movement Corridor Package within the Stroud Sustainable Transport Strategy (AECOM, November 2019). The Strategy states:

"The approach to this corridor should ensure that surrounding settlements, such as Whitminster, Eastington and Berkely, can access these express services by sustainable modes if possible and ensure that they do not compromise the express nature of this service."

- 2.29 Delivery Policy DEI1 states that " Pump-prime funding for these measures will be sought from developer contributions". The A38 corridor (wherein Whitminster is located) therefore represents a significant opportunity for further development that can align and help support enable the delivery of enhanced service provision. Further development in this location can help facilitate and enable further service provision through increased patronage and contributing to the critical mass required to ensure enhanced bus services are deliverable. This is recognised within Stagecoach West's response to the Regulation 18 consultation (Representor ID 00594, dated 18th January 2019) at Question 4.2c which supports further growth at Whitminster.

3.0 OTHER SECTIONS

Mini vision - The Severn Vale

3.1 The Mini Vision outlined for the Severn Vale is for:

"Maintaining a distinctive rural way of life and strengthening the resilience of the area's communities, built heritage and natural environment..."

3.2 In contrast, of the seven other Mini Visions, six refer to 'growth', 'growing', 'prosperity', 'community vitality' or 'regeneration'.

3.3 The Mini Vision for Severn Vale is not sufficiently aspirational and therefore does not accord with Paragraph 16 of the NPPF which states that "plans should be prepared positively, in a way that is aspiration and deliverable". As currently drafted, it fails the test of soundness in Paragraph 35 of the NPPF in that it is not 'positively prepared'. For the reasons outlined earlier, Whitminster (which lies within the Severn Vale) has far greater capacity for development than is currently allocated and would assist in facilitating delivery of enhanced public transport. To exclude otherwise sustainable development at the plan-making stage would not accord with the soundness test of "justified".

3.4 Accordingly, the Mini Vision for Severn Vale should be amended to ensure that sufficient aspirational growth is attributed to it reflective of the locational sustainability of some of its settlements, and in particular Whitminster.

3.5 A summary of SA effects for the Mini Visions of each Parish is provided in Table 4.3 of the Draft Local Plan SA (November 2019) with further commentary for the Severn Vale cluster (wherein Whitminster is situated) being provided in Paragraphs 4.42 – 4.44. The appraisal for the Severn Vale cluster is reproduced below:

SA Objective	Severn Vale
SA1: Housing	0
SA2: Health	+
SA3: Social Inclusion	0
SA4: Crime	0
SA5: Vibrant Communities	0
SA6: Services and Facilities	+
SA7: Biodiversity/geodiversity	+

SA 8: Landscapes/townscapes	+
SA 9: Historic environment	+
SA 10: Air quality	+
SA 11: Water quality	0
SA 12: Flooding	+
SA 13: Efficient land use	0
SA 14: Climate change	+
SA 15: Waste	0
SA 16: Employment	0
SA 17: Economic growth	+

- 3.6 As per our earlier comments in respect of Policy CP2, we consider that there are inaccuracies within the SA – given the limited growth strategy for Severn Vale (and Whitminster in particular), negative performance against the SA housing objective, as well as the services and facilities and vibrant communities objectives would be expected. The very limited housing growth proposed in Whitminster could potentially impact on vibrancy of services and facilities and cause localised housing supply issues and associated house price increases. The SA has not accounted for the potential negative effects of the proposed development strategy for Whitminster on these social objectives.

4.0 SITES SURVEY

Site Allocations

PS34 Sharpness Docks, PS36 New Settlement at Sharpness & PS37 New Settlement at Wisloe

- 4.1 For the reasons set out earlier in these representations, we consider that there are significant risks associated with the delivery of the of 4,200 dwellings allocated within the plan period at sites PS34, PS36 and PS37.
- 4.2 We understand that there are additional technical and deliverability concerns⁵ associated with the transportation proposals for Sharpness due to its relative inaccessibility, reliance on infrastructure provision such as the Sharpness Branch railway and its isolated position.
- 4.3 In order to alleviate such concerns, we consider that readily available sites being promoted by developers with realistic prospects of delivery that are not reliant on significant infrastructure should be allocated to ensure that that the Local Plan's housing requirement can be met.

WHI010 Land at Jaxons Farm

- 4.4 The site the subject of these representations is referred to as WHI010 Land at Jaxons Farm within the 2019 Strategic Assessment of Land Availability (SALA). Following the site's SALA submission, it has come under the control of Redrow Homes Limited – albeit a slightly larger area is now controlled, as shown on the enclosed red line plan.
- 4.5 This section of the representations will set out the suitability of the site, along with commentary on the SALA assessment of the site and the Sustainability Appraisal of the site undertaken on behalf of the Council.

Suitability of Site for Residential Development

- 4.6 The site is located to the north of Hyde Lane and to the west of the A38. It comprises approximately 7.5 hectares of agricultural land. The proposed development of the site can include the delivery of approximately 200 homes including open market, affordable housing and self-build housing – providing a range and choice of family housing within an area in demand. The emerging proposals for the site will include the delivery of on-site Green Infrastructure that would provide biodiversity and recreational benefits.

⁵ As set out in Stagecoach West's response to the Regulation 18 consultation (Representor ID 00594, dated 18th January 2019)

- 4.7 As previously set out, overall, Whitminster has good accessibility to local services and facilities (primary school, post office, community hall, and children's play space/playing pitch – plus a pub, church and a local shop). It also has good access to a variety of employment close by, and has a jobs surplus, acting as an employment hub. Residential development of the site would stand to benefit from being located within proximity of these services and facilities. Moreover, the site is located adjacent to the A38 which is identified as a public transport corridor that will benefit from enhanced public transport service provision. Development of the site can help facilitate and enable this through increased patronage and contributing to the critical mass required to ensure enhanced bus services are deliverable.
- 4.8 The enclosed walking and cycling isochrone plans (B05128 Fig 1 & 2, clarkebond) evidences that there are a number of services and facilities within walking and cycling distance of the site.
- 4.9 Access to the site is proposed from a realigned Hyde Lane, as shown on the enclosed Site Access Proposals Plan (SK01A, clarkebond). Associated plans (SK02A – SK05A, clarkebond) are enclosed showing vehicle tracking and visibility which demonstrate that the proposals would not be detrimental to road safety and therefore accord with Draft Local Plan Core Policy CP13.
- 4.10 An Extended Phase 1 Habitat Survey and habitat condition assessment has been undertaken by Green Ecology. The enclosed Ecological Constraints and Opportunities Report documents the findings of the survey. Whilst further surveys are required which will help inform the emerging masterplan for the site, it is considered that the habitats of ecological value can be readily accommodated into a sensitively designed scheme and that there remains ample opportunity for mitigation, compensation and enhancement measures. Overall, it is considered that there are no significant or in-principle ecological constraints that would preclude the residential development of the site, and there is moreover the opportunity to achieve biodiversity net gain and compliance with local and national policy.
- 4.11 Whitminster Footpath 12 runs through the south west of the site and can be readily accommodated as part of any development proposal. The site is not the subject of any TPOs or known utilities. There is not considered to be any unresolvable technical constraints to the development of the site.
- 4.12 The proposals are being brought forward on land made available by a single willing and compliant landowner by an established developer with a track record of delivering successful residential-led schemes in Stroud.
- 4.13 It is envisaged that the site, if allocated, would be the subject of a planning application in 2021. This would provide the opportunity for outline planning permission to be granted and reserved matters applications to be submitted for development to commence early following the adoption of

the Local Plan. Development would be phased across the Plan period making the rate of change within the settlement gradual allowing new residents to assimilate into the community. The entirety of the scheme would be delivered within the Local Plan period at approximately 50 homes per annum.

- 4.14 It is accordingly considered that the allocation of the site would contribute to the overall soundness of the plan – not least through contributing to its effectiveness.

Strategic Assessment of Land Availability

- 4.15 The 2019 SALA New Sites Update Report states the following in respect of the site's rejection:

"The land is not suitable for housing, employment or community development because of the high landscape sensitivity of the site, highly visible to the north and separate from the main part of the settlement in open countryside. There are therefore potential impacts preventing sustainable development in this location."

- 4.16 It therefore appears that the sole reason for the site's rejection is on the basis of landscape impacts. A Landscape and Visual Appraisal will be undertaken in due course to assess the landscape impacts of development of the site. Notwithstanding this, it is initially considered that the existence of built development to the north (Whitminster Motors, to the south (suburban residential properties at Hyde Lane) and to the east (the A38, followed by Attwools) along with the Jaxons Farm complex of buildings and strong boundary vegetation to the west serve to lessen any potential landscape impacts. It would appear that the site has capacity to accommodate the development proposed, subject to being of a sensitive design. the landscape assessment works will consider the network of green infrastructure across the site and its relationship with the listed Jaxon's Farmhouse. The assessment will inform the emerging masterplanning proposals as the site continues to be promoted through the Local Plan.

- 4.17 It should also be noted that the Stroud District Landscape Sensitivity Assessment (December 2016) has been undertaken on a broad-brush basis and does not assess a specific development proposal. It therefore does not include any consideration of mitigation or sensitive design. Notwithstanding this, it notes at Paragraph 3.61 that *"the preferred direction for housing growth for Whitminster is to the north east and north west"*.

Sustainability appraisal of WHI010

4.18 Appendix 5 of the 2019 SA provides a sustainability appraisal of all of the site options considered in the local plan review process, including WHI010 – reproduced overleaf.

SA Objective	Score	Justification
SA1: Housing	+	This site has capacity for 200 homes.
SA2: Health	++/-	This site is not within 800m of a GP. The site is located within 800m of a council play area, a protected outdoor playspace and a green space. The site is located within 400m of a National Cycle Network route.
SA3: Social Inclusion	0	Residential site options will all have negligible effects on this objective.
SA4: Crime	0	Residential site options will all have negligible effects on this objective
SA5: Vibrant Communities	0	This site is on greenfield land.
SA6: Services and Facilities	+	This site is a tier 3a settlement
SA7: Biodiversity/geodiversity	0?	The site is not within 1km of internationally or nationally designated sites or 250m of locally designated sites. It is not within 7.7km of the Severn Estuary SAC/SPA/Ramsar site or 3km of Redborough Common SAC
SA 8: Landscapes/townscapes	--?	This site is in an area which was rated in the Landscape Sensitivity Assessment as being of high/medium sensitivity to residential development. It is not within the Cotswolds AONB or within 500m of the AONB.
SA 9: Historic environment	0	This site was screened out of the SALA heritage assessment as having no heritage impacts.
SA 10: Air quality	--	The site scored 83 in the Stroud SALA Transport Accessibility Assessment.
SA 11: Water quality	0	The site is not within a Drinking Water Safeguarding Zone or a Source Protection Zone.
SA 12: Flooding	-	The site is on greenfield land outside of flood zones 3a and 3b.
SA 13: Efficient land use	--?	The site is relatively small in size, on greenfield land and is on Grade 3 agricultural land.
SA 14: Climate change	0	Residential site options will all have negligible effects on this objective.
SA 15: Waste	0	This site is on greenfield land.
SA 16: Employment	--	The site is located further than 1km from an employment site and is not at a Tier 1 or Tier 2 settlement

SA 17: Economic growth	+?	The site is located within 800m of at least one existing primary school but is not within 800m of an existing secondary school
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4.19 In summary, we note the following key messages:

- WHI010 scores well against housing, services and facilities and economic growth SA objectives.
- The site has negligible effects on social inclusion, crime, vibrant communities, historic environment, water quality, climate change and waste.
- There are uncertain effects against biodiversity/geodiversity.
- Mixed effect against health (ie -/+), but we note that the commentary describes positive effects as the site is located within 800m of parkland and, walking and cycling routes;
- The site has neutral effects are considered against the historic environment with the SA noting that the '*SALA heritage assessment [identified the site] as having no heritage impacts*';
- There are negative effects against air quality and efficient land use (although the proposed allocated site PS45 and PS46 has exactly the same negative performance against these objectives hence, this would apply to all sites within Whitminster); and
- There is negative performance against the landscape/townscape objective – albeit our considerations against this objective are set out earlier in these representations in respect of the SALA assessment.

5.0 CONCLUSION

- 5.1 In conclusion, the Draft Local Plan's strategy (as currently drafted and proposed through Core Policy CP2) is over-reliant on allocations at Sharpness and Wisloe that are unlikely to deliver the required number of dwellings in the plan period. Moreover, the vision for Severn Vale and the level of growth proposed at Whitminster is not considered sufficient to support a strong and vibrant community – this is particularly the case given the range of services and facilities available at Whitminster along with its proximity to the A38 corridor which represents a significant opportunity for enhanced public transport provision.
- 5.2 Land at Jaxons Farm, Hyde Lane, Whitminster is suitable, available and achievable and should be allocated to contribute to the delivery of housing in the district, and to address the needs and deficiencies in the vision for the Severn Vale. The site is suitable, available and achievable and has potential for approximately 200 homes. It is well placed in relation to existing services and facilities and its residential development can help facilitate improvements to the A38 bus services through an increased critical mass.
- 5.3 The land, being promoted by a developer with a track record of delivering successful schemes, should therefore be allocated to contribute to the overall soundness of the Local Plan.