

STROUD LOCAL PLAN INSPECTORS- RESPONSE TO MATTERS, ISSUES AND QUESTIONS

RELATING TO ALLOCATIONS PS05 (and PS05a) EAST OF TOBACCONIST ROAD

CAMPAIGN TO PROTECT RURAL ENGLAND (CPRE) COMMENT

**Point 19a: Is the council's conclusion that the site does not constitute major development, in the context of paragraph 177 of the Framework justified?**

In our opinion, no.

We wish to point out that the Cotswold Conservation Board comment relating to this site suggest a high degree of conflicted thinking and indecision. Having previously objected to the site, surprisingly they then retracted their refusal. In their 'Comments to the Pre-Submission Draft', their remarks include the following:

*'...we consider that it potentially constitutes major development in the context of paragraph 172 and footnote 55 of the NPPF.....we note that SDC has undertaken a 'Policy Assessment of Draft Allocated Sites' for sites within the Cotswold AONB. This assessment concludes that allocation PS05 would not constitute major development. However we are concerned that this assessment, which was undertaken in May 2021, only takes account of our consultation response to the Emerging Strategy Paper (dated January 2019) and not our consultation response to the Draft Plan (dated 7 February 2020). The 2020 response applies more stringent thresholds which have not been taken into account.*

*'In March 2021, the Board adopted its landscape-led Development Position Statement, which clarifies the Board's formal guidance and recommendations relating the major development. Based on the guidance provided in this Position Statement, we consider that the allocation potentially does constitute major development. However, the adopted Position Statement was only shared with the local authorities on 14 May 2021. As such, we acknowledge that this would have been too late to influence SDC's policy assessment.*

*'.... We still have some concerns that there could be adverse impacts on the natural beauty of the AONB, particularly with regards to the adjacent Scheduled Ancient Monument (with 'cultural heritage' being one of the factors that contributes to the area's natural beauty).'*

On this basis, we find it very odd that the CCB says that it supports the allocation PS05 (PS05a is not mentioned, suggesting some understandable confusion about this site's status in the plan). The reasons they give for their (reluctant and confused) support include:

1. There is sufficient evidence and proposed sufficient mitigation for the allocation to be legally compliant and sound.
2. The parcel has low landscape sensitivity.
3. There is a level of housing need, specific to the settlement of Minchinhampton, to justify a development of this scale in this location.

We would argue that:

1. The best form of mitigation is to leave this as a green field site. Mitigation is never 100% protection even though it looks good on paper and makes everyone feel better.
2. We would argue that this is not the case. The field slopes to the east and is clearly visible in this direction. Furthermore it is potential winter grazing land for the cattle grazing the commons in the summer. This grazing, vital to the health and status of the commons, is

under constant threat from a number of sources including the disappearance of winter grazing land.

3. Minchinhampton has been growing steadily over the last decades at a rate of at least 8 houses a year. This is more than enough to satisfy affordable housing need in the parish (see Inspector's report on S.20/2667/FUL The Knapp appeal). Given the way that SDC allocates affordable housing based on level of need rather than where you live/work, there is no guarantee that those living in the parish (or anywhere else in the Cotswold AONB) will be given a house in this location. In theory houses could be built over every inch of spare land in the parish and still not satisfy parish/AONB need given the SDC definition of 'local'.

Added to this site's position in the AONB, the site's immediate proximity to the Bulwarks Scheduled Ancient Monument as well as to Minchinhampton SSSI and the Rodborough Common SAC provide even further arguments for removing PS05 from the plan, as previously outlined.

The same arguments apply to PS05a.