



# STROUD ADDITIONAL HOUSING OPTIONS REPRESENTATION

in respect of  
Land at The Knapp, Minchinhampton  
on behalf of  
Piper Homes

16 December 2020



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# 1. INTRODUCTION

- 1.1. This is a submission to the Stroud District Local Plan Review Additional Housing Options Consultation, which ends on 16<sup>th</sup> December 2020. It is prepared on behalf of Piper Homes by RCA Regeneration Ltd.
- 1.2. Stroud District Council are conducting a local plan review, which started in 2017 with the aim of submitting a plan for examination in May 2021.
- 1.3. The purpose of this consultation is to specifically review the spatial strategy of future development, whilst also seeking potentially new sites which could accommodate the requirement for new growth within the District.
- 1.4. The importance of this is magnified by National Government's proposed changes to the way in which minimum housing requirements are generated<sup>1</sup>. On the basis of current permissions, the Government's proposed changes, draft allocations and a windfall allowance, it is estimated that there will be a shortfall of between 1,050 and 2,400 new dwellings in the District, unless new sites are proposed. In light of worsening affordability<sup>2</sup>, this is clearly an urgent issue.
- 1.5. Stroud District Council are also looking to propose a reserve housing supply, to protect against speculative applications which may arise if delivery of allocated sites stalls or if additional flexibility is required within the plan period, as required by the Framework.
- 1.6. These views are without prejudice to future submissions or hearing statements, which may be made in advance of the Examination.

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<sup>1</sup> <https://www.gov.uk/government/consultations/planning-for-the-future>

<sup>2</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

## 2. REPRESENTATION

2.1. This chapter provides comments made on behalf of our client, Piper Homes, in respect of the questions contained within the Consultation paper. Not all questions have been answered.

### **Question 1: Which strategy option(s) would you support, if additional housing land is required?**

2.2. We consider that the best strategy for providing new growth would be Option B, which would focus on looking for further housing sites at Tier 2 and Tier 3a/b settlements.

2.3. This is because there are many larger towns and villages within Stroud that have received very little new development in recent years. New growth is essential to help support services and facilities, an issue which has become particularly profound in the current economic climate, with many retail and hospitality venues across Stroud struggling or facing closure.

2.4. Minchinhampton boasts an excellent range of higher order services and facilities, which include:

- Primary School
- Library
- Pharmacy
- Butchers
- Takeaways
- Charity Shop
- Estate Agents
- Cafes
- Bridal Shop
- Retail offering
- Convenience stores
- Pubs/restaurants
- Youth Club
- Cricket Club
- MOT Centre

2.5. Rather than providing an intensification at already proposed strategic allocations (Option A), in which new services would have to be provided 'from scratch', a more sensible proposition would be to support the vitality of existing settlements and support their existing services and facilities.

Minchinhampton also benefits from several bus stops, with services to Stroud and Nailsworth, for example. This provides a sustainable means of transport for future residents who would not necessarily be reliant on private vehicular use. Minchinhampton would therefore be a suitable location for new growth.

### **Question 3 Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?**

2.6. Yes, this would provide the Plan with additional flexibility, as required by the Framework.

**Question 4 Which strategy option(s) would you support, if a reserve site (or sites) is required?**

- 2.7. For the reasons given in answer to the previous question, reserve sites within towns and villages would be appropriate. Nevertheless, Options A or D (Intensification and Wider dispersal respectively) may be appropriate dependent on the circumstance in which the reserve sites should be required.

**Question 8 Are there any other sites that you would like to be considered for future housing development?**

- 2.8. We consider that the land at The Knapp would be an appropriate location for new housing development within Minchinhampton. The 2.02 ha site could accommodate 35 new homes, including green infrastructure (such as allotments, suds, open space and landscaping) using a design and layout which has been driven by a Landscape and Visual Impact Assessment, having regard to the AONB designation which washes over it. The location of the site is shown below:



- 2.9. The site is positioned at the northern side of Minchinhampton, immediately north of a recent redevelopment at The Tynings. This new development has resulted in a fairly hard urban edge, which the proposals we have drawn up for The Knapp would seek to address through the softening of this edge of the town.
- 2.10. The landscape-led proposals have been designed to retain key views through the site, with a strategically placed open space. A great amount of planting is proposed against the western

boundary of the site, which would ensure that the proposed development would be softened. The site also proposed a considerable amount of planting within the site too, providing a number of different new habitats. Finally, community allotments would improve social cohesion as well as positive physical and mental health and educational impacts of growing food.

2.11. A proposed site plan has been included below to show how a development at the site could look:



2.12. An application has been submitted and has been confirmed as a valid planning application (Ref: S.20/2667/FUL). This means that the site has been subject to extensive technical evidence gathering. These documents demonstrate that the site is deliverable, with no constraints to development, other than the AONB landscape harm, which is a constraint for much of this part of the District. A summary of these documents are provided below:

### Heritage Statement

- 2.13. A Heritage Statement has been prepared which states that there are a number of listed buildings within the vicinity (500m) of the site, with the Grade I Church of the Holy Trinity just beyond the 500m radius.
- 2.14. The Statement demonstrates that the proposals will not have any detrimental impact on the setting of any of the designated and non-designated heritage assets. The report concludes that the quantum and nature of the development would materially retain the existing (baseline) conditions and setting of the heritage assets, therefore having a neutral impact in terms of the assets' significance.
- 2.15. The report concludes that there are no constraints to development from a heritage perspective.

### Flood Risk Assessment

- 2.16. The report states that the site is within Flood Zone 1, defined as having a less than 1 in 1000 (0.1%) annual probability of river or sea flooding. The risk of groundwater emergence is also anticipated to be low, arising from the elevated position of the site.
- 2.17. The report notes that testing has confirmed that infiltration to ground as a method of surface water disposal is feasible. This would mimic the pre-development greenfield nature of the site, therefore not increasing the risk of flooding within or near to the site.
- 2.18. Proposed roads will be designed to route any residual surface water into open spaces and the infiltration basin, and not towards dwellings. Foul water is to connect to the existing STW public foul sewer.
- 2.19. This report demonstrates the suitability of the site from a flooding and drainage perspective.

### Transport Statement

- 2.20. The report notes that there are several amenities and services within walking distance, and clearly a great number also within cycling distance. It also notes that there are also public transport opportunities within an appropriate distance of the site, and therefore, there are several opportunities to travel by sustainable modes.
- 2.21. It is proposed that carriageway at The Knapp would be widened to 4.8m. Visibility commensurate with speeds of 20mph have also been shown to be achievable, whilst swept path analysis for the correct and relevant service vehicles could also be achieved.
- 2.22. Parking is to be provided at an appropriate level, whilst adequate secure cycle parking has also been factored in. Trip generation arising from the proposed development are not expected to have a detrimental impact on the safety and operation of the highway network.
- 2.23. In conclusion, the proposals would not generate unacceptable impacts on highway safety or capacity.

### Housing Need Assessment

- 2.24. The Housing Needs Assessment was conducted in March 2020 by WP Housing. The report uses a sophisticated model for establishing housing need, specific to the Parish of Minchinhampton over the plan period to 2031.
- 2.25. The assessment has been based on population forecasts for the parish and how these forecasts relate to housing preference. It is also based on household composition forecasts and the



relationship to housing preference. It also looks at housing cost by different tenures, the income required to afford these options and how they relate to income distribution.

- 2.26. The assessment concludes that home ownership within the Parish is high (52.55%) compared to Stroud District (38.05%), which is even higher than the UK average (34%). However, ownership has been declining and is projected to decline further, largely due to the lack of housing supply and high housing costs, relative to the actual gross income data. The ONS median house price to earnings ratio data for Stroud District (as referred to earlier in this document) shows that people looking to purchase a median-priced home would need an income multiplier of nearly 9 times, making it impossible for first time buyers or newly formed single households. In high value towns like Minchinhampton, this is likely to be far worse.
- 2.27. Allied with the above findings, private renting has increased, which is counter to the aspiration of renters, according to a 2018-2019 study. There is overcrowding and under-occupation, which created need and supply.
- 2.28. The findings of the report are that there is a need for 156 affordable/social rent dwellings and 127 shared ownership dwellings, when accounting for re-supply from existing stock, in the 11 years up to 2031. This averages 14.2 and 11.5 dwellings per year, respectively. The need was primarily for 3 beds, followed by 2-bed dwellings and then finally by 1-bed dwellings.
- 2.29. This report demonstrates that there is existing unmet need for affordable housing within Minchinhampton, and this is likely to get worse. This justifies the approach being proposed for 100% affordable housing at the site.

#### Ecology & Trees

- 2.30. Four documents were prepared in this regard:
  - **Preliminary Ecological Appraisal (PEA)** – The report found some nesting potential for common and farmland bird species, as well as other species of local and national interest. No roosting bats were found, whilst the site offered low suitability for foraging and commuting bats. No reptiles were found, albeit part of the site offered some suitable habitat, and therefore the report sets out some mitigation.
  - **Protected Species Survey, Reptile Presence/Absence** – No reptiles were found during the survey and therefore the application site is considered to hold 'site' value for reptiles in a local context. The proposed plans constitute an Unlikely Negative (Not Significant) impact upon reptile species, and therefore no formal mitigation is required.
  - **Protected Species Report** – This report is confidential, the Council should look at this separately.
  - **Arboricultural Impact Assessment** – The AIA identifies a number of trees which were suitable for removal, whilst stating that the other trees should be preserved. Site clearance is recommended to take place outside of the bird breeding season. The report concludes that there is unlikely to major impacts if the CEZ is implemented, whilst new planting will increase the amenity value of the site and provide new habitat.
- 2.31. The site is therefore relatively unconstrained in terms of ecology and trees, with the reports suggesting mitigation which could be adopted as part of any forthcoming development or allocated.

#### Landscape and Visual Impact Assessment (LVIA)

- 2.32. The LVIA is a robust document which has been carefully prepared to assess the local and wider landscape character. It was prepared well in advance of the site layout being produced.

- 2.33. The report establishes a vision for the site which amongst other things, strives to conserve and enhance the natural environment within the context of the local and wider landscape; maintain key views; preserve and enhance views from Besbury Common footpath; enhance biodiversity at the site; provide a network of hedges and all year round foliage. These visions are then translated into a Landscape Planting Plan which achieves these aims. The report then conducts an assessment of the site design with landscape mitigation, before concluding that the site will blend into the wider landscape, whilst providing a new street character.
- 2.34. This demonstrates that a development is possible at the site, despite the location within the AONB.

### **Conclusion**

- 2.35. We consider that it is clear that new sites will be required to accommodate unmet housing need in Stroud District, together with the need to incorporate flexibility into the emerging plan.
- 2.36. Burgeoning house prices in places like Minchinhampton will only serve to exclude more and more people from home ownership and in light of the Covid pandemic and potential economic fallout from Brexit this is likely to worsen over the coming years.
- 2.37. The land at The Knapp, situated at the northern edge of Minchinhampton, has been proposed as an alternative site when development opportunities were being considered by the policy team at the beginning of the plan review process. We consider we have demonstrated that the land at The Knapp is deliverable, and it is available now, with no major technical constraints to development that could not be subject to appropriate mitigation. It would therefore provide a positive and much-needed contribution to housing choice for the District and the town within the first 5 years of the new plan period.
- 2.38. Should the Council consider other sites to be more suitable, we consider this site should be included as a reserve site.