

Part B – Please use a separate sheet for each representation

Name or Organisation: Minchinhampton Local Plan Response Group

3. To which part of the Local Plan does this representation relate?

Paragraph	3.1.8- 3.1.10	Policy	NPPF 12,103, 104, 108, 109, 110, 111 171, 172, 174, 175, 175b, 176, 194, 195 SDC: CP3, CP2, ES7, HC1.9, DHC5, DCP1, CP13, CP14, DHC6, ES10,SO6, DHC6, ES3, ES6, DES2. Minchinhampton NDP: Traffic 1&2, Transport 1&2, 2.12, 3.31-3.37 NDP Policy MPEnv4 <i>Habitats Regulations Assessment of Stroud Local Plan 6.24, 6.28, 6.57</i>	Policies Map	PS05 including PS05a
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Summary of key points

The Minchinhampton Local Response Group do not believe that paragraphs 3.1.8-3.1.10 relating to PS05 and PS05a are deliverable because:

- Paragraphs 3.1.8-3.1.10 are not legally compliant
- Priority should be given to developing available brownfield sites and sites within the settlement boundary Greenfield sites within an AONB are not needed and should remain protected
- Site access and accessibility to services and facilities are not deliverable and not consistent with the NPPF, SDC's own plan and the adopted Minchinhampton NDP (2018-2036)
- PS05 and PS05a are not deliverable because of the impact on the Rodborough and Minchinhampton Commons
- They abut a scheduled ancient monument
- Development is not consistent with the aims of the Stroud District Landscape project
- Minchinhampton's designation as a Tier 2 settlement is not sound because of the range of services, facilities and retail outlets does not compare with other Tier 2 settlements

Paragraphs 3.1.8-3.1.10 are not legally compliant because

- a) Minchinhampton has an adopted Neighbourhood plan (NDP) covering the period 2018 – 2036. Under the localism act, communities have direct power to develop a shared vision for their neighbourhood and shape future plans. The SDC local plan has not incorporated this into their draft plan.
- b) The public consultations on the Local Plan did not include access from PS05 via The Bulwarks. At the consultation events, access onto Tobacconist Road was discussed and evidence, such as the several hundred objections on the grounds of traffic congestion and road safety to a previous planning application of a similar number of houses on PS05 and PS05a was put forward. Without suggesting The Bulwarks as a possible access to Glebe Farm there was no opportunity for local people to comment or to offer their personal experiences.
- c) Site PS05a is included in the Local Plan as a reserved site for development in the future. We understand that the present landowner may petition to have PS05a included in the Local Plan and that the Local Planning Strategy team were unaware of this, but due to its status in the Local Plan today many people will not have addressed the issue arising from the development of this site, instead focussing on the development of PS05. The consultation process for making representations is therefore flawed if the Planning Inspector is minded considering PS05a as a potential site for development.

Priority should be given to developing the available brownfield sites and sites within the settlement boundary. Greenfield sites within the AONB are not needed and should remain protected

- a) The SDC local Plan has not considered reasonable alternatives to building within an AONB. The plan is, not based on proportionate evidence with respect to NPPF12, NPPF172, CP2, ES7 relating to housing need, supply, sustainability and location (AONB).
- b) Minchinhampton has consistently delivered an average of 12 new houses per year with 191 houses built since 2000 (Minchinhampton NDP paragraph 2.12). There is no reason to suppose that with the current mix of larger brownfield and windfall sites, that this cannot continue.
- c) Additionally, the SDC local plan includes a 30% excess in housing provision (CP2). The minimum residual housing requirement is outlined in the Plan's Table 2 at 8,005 dwellings, and from Table 3 the total supply for the Plan period up to 2040 is outlined at 10,340 dwellings. This means that there is nominal overprovision of 2,335 dwellings or 29%. With this large overprovision, it would therefore seem unnecessary and unjustified to undertake major development in the AONB which is carefully and deliberately protected by national and local policies (most notably but not solely NPPF paragraph 172 and SDC policy ES7, Cotswold AONB Management Plan (policies CE1, CE4-7, CE11-12 and Appendix 9).

- d) NPPF 172 and the National Planning Practice Guidance set out how development within the AONB should be approached. Any development within the Cotswolds AONB should be based on needs arising from within the AONB. This is in line with Policy CE12 on the current Cotswolds AONB Management Plan 2018- 23. The Local Housing Needs Assessment 2019 for Gloucestershire states in Point 10 that the Local Housing Need only provides a starting point for establishing the final housing requirement. It says it will be important to balance the need for housing against policies intended to restrict development in AONBs and any other areas with similar constraints.

Site access and accessibility to services and facilities are not deliverable and not consistent with the NPPF, SDC's own plan and the adopted Minchinhampton NDP (2018-2036)

- It is not consistent with national planning policy sections 2 and 9
- It is not consistent with their own proposed Stroud District Local Plan
- It is not consistent with the Minchinhampton Neighbourhood Development Plan which has been adopted by Stroud District Council (SDC) – a requirement
- It does not take into consideration sustainability within Minchinhampton's conservation area which is a requirement of the Minchinhampton NDP

1. Non-compliance with national planning policy sections 2 and 9

SDC have failed to comply with the requirements of the NPPF (2019) with regard to Section 9. Promoting sustainable transport.

- a) Specifically, the proposed allocations in Minchinhampton, ("a dormitory settlement") in which there are few employment opportunities, some limited facilities, no secondary school, extremely poor public transport provision and an oversubscribed primary school, will inevitably lead to a significant increase in vehicular journeys to and from places of work and schools outside Minchinhampton since the closest settlements with these facilities (Nailsworth and Stroud) are located within the deep valleys 460-560 feet below and cannot be accessed safely on foot or by bike. Thus, the requirement of NPPF Para. 103, that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes", would not be met.
- b) The Head of Planning at SDC, wrote that access to other settlements from PS05 is "fair" by public transport and that "accessibility to key services and facilities in other settlements is fair with good walking times" (see Appendix 1 email dated 15 June 2021: correspondence from [REDACTED] Head of Planning, SDC to Geoffrey Clifton-Brown, MP). The evidence does not support this. The local bus timetable (see Appendix 2) shows infrequent services through Minchinhampton; Appendix 3 shows the topography of the land between PS05 and PS05a and the nearest settlements of Stroud and Nailsworth. In summary, PS05 and PS05a are also contrary to DCP1 because the location means that use of private car is essential and sustainable travel is not viable.
- c) In the context of Minchinhampton and PS05's proposed location and access arrangements the proposed 80 houses (with more to come possibly on PS05a) are considered a "significant development". It is noteworthy that SDC (in their Draft Local Plan Para. 4.18) class a development of 10 or more dwellings as a "major housing development"
- d) The proposal fails to meet the requirements of NPPF Para. 104a as the allocation of these 80+ houses to Minchinhampton will be in direct opposition to the requirement to locate development so as to "minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities". Figure 1 shows the site and access routes in relation to Minchinhampton town centre.
- e) The proposal fails to meet the requirements of NPPF Para. 104d to provide a high-quality walking and cycling route. The proposed pedestrian and cycle access via Tobacconist Road is inadequate and potentially unsafe. The section between Tobacconist Road and the site is a narrow, rutted track less than 3 metres wide, which is also the vehicular access to a number of houses. There is not sufficient width to provide any refuge space for parents with children, pushchairs etc. taking their children to school or playgroup in Minchinhampton (assuming that places are available). There is not footpath along the length of Tobacconist Road and much of Friday Street, leading into Minchinhampton centre. What footpath there is in the lower end of Friday St. is not wide enough to take a push chair. Figure 2 shows the pedestrian access to the town centre where the primary school is located and from where school buses depart.

Figure 2: site location and access routes



Figure 3: Photographs of pedestrian route into the centre of Minchinhampton (surgery, school and shops)

a) Proposed pedestrian access onto Tobacconist Road from PS05



b) Pedestrian route along Tobacconist Road to centre of Minchinhampton



c) Pedestrian Access along Friday Street to centre of Minchinhampton



- f) The proposal fails to meet the requirements of NPPF Para. 108a in that this site does not provide an opportunity for sustainable transport. Almost all vehicular journeys will be by private car.
- g) The proposal fails to meet the requirements of NPPF Para. 108b in that safe and suitable access cannot be achieved for all users. As shown in Figure 3 there is no safe access for pedestrians or cyclists. The proposal to route the vehicles from the development through Farm Close, The Bulwarks, Glebe Road, Summersfield Road and onto Butt Street to then go into or out of Minchinhampton is ill thought-out and potentially unsafe. These estate roads were built with relatively narrow carriageways and tight bends. Added to these infrastructure restrictions the residents of the existing estate generally have to park their cars on the road (or part on road and part on footpath, which endangers pedestrians) as there is little provision for off-street parking – thus reducing these roads to one-way working. The extra traffic generated by the development will make the current unacceptable traffic congestion during 'commuting' hours much worse.

Figure 4: Photographs of proposed vehicle access to PS05

d) Access to the site via Farm Close



e) Narrow Roads through existing housing estate



f) Access to the estate from Butt Street into Summersfield Road



- h) The proposal fails to meet the requirements of NPPF Para. 108c in that no proposals have been offered so that the additional capacity, congestion and highway safety issues of the local road network within the existing estate would be mitigated.
- i) The proposal fails to meet the requirements of NPPF Para. 109 since it will have a severe cumulative effect on the local road network, including the existing estate, the centre of Minchinhampton and the roads across Minchinhampton Common (SSSI) and onto Rodborough Common (SAC). Figure 5 shows the narrow streets in the centre with single track access from all directions. This is where most of the services, facilities and retail outlets are located.

Figure 5: Images of access to Minchinhampton Town Centre

- a) Access via West End and Butt Street to the town Centre are along the bus route



- b) The other two access roads to the town centre are also narrow, single track roads



- j) The proposal fails to meet the requirements of NPPF Para. 110a since it does not give priority first to pedestrian and cycle movements, within the neighbouring areas (see figure 3); and second, it will be difficult to access to high quality public transport, that would encourage public transport use (see Appendix 2).
- k) The proposal fails to meet the requirements of NPPF Para. 110b since its location does not address the needs of people with disabilities and reduced mobility in relation to all modes of transport
- l) The proposal fails to meet the requirements of NPPF Para. 110c since it does not create places that are safe, secure and attractive or minimise the scope for conflicts between pedestrians, cyclists and vehicles, as they travel to and from the site
- m) The proposal fails to meet the requirements of NPPF Para. 110d since the additionally generated traffic on the existing estate roads will not allow for the efficient access by service and emergency vehicles
- n) The proposal fails to meet the requirements of NPPF Para. 111 since this development will generate significant amounts of movement. Before SDC allocated this site (and PS05A) they should have provided a travel plan, so that the likely impacts of the proposal could be assessed.

2. It is not consistent with their own proposed Stroud District Local Plan

SDC have failed to comply with the requirements of their own proposed Local Plan, in respect of

- a) Delivering Policy HC1.9, because the proposed development would not provide safe access and would not improve local access to walking and cycling routes
- b) New Delivery Policy DHC5, because the development of this site, in particular the access and traffic arrangements, would have an adverse impact on the existing community in the estate and no mitigation measures are proposed.
- c) Core Policy CP14.7 because the development of this site, in particular the access and traffic arrangements, would have an adverse impact on the amenities of neighbouring occupants in the existing estate
- d) Core Policy CP14.13 because the development of this site, in particular the proposed pedestrian and cycling access arrangements, cannot provide the safe, convenient and attractive accesses required by this policy

- e) Core Policy CP14.14 because this site's location is not near to essential services and good transport links to services by means other than motor car. The walking routes proposed to the centre of Minchinhampton, especially the school and doctors' surgery, are at the limit or beyond the normally recommended comfortably achieved distance for those with pushchairs etc. going to and from school and playgroups and also for the elderly residents using a stick or walking frame. In addition, the proposed walking/cycling route is unsuitable and potentially unsafe as noted in 1c above.

3. It is not consistent with the adopted Minchinhampton Neighbourhood Development Plan

Minchinhampton has an adopted Neighbourhood plan covering the period 2018 – 2036. Under the localism act, communities have direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area (<https://www.gov.uk/guidance/neighbourhood-planning--2>). PS05 and PS05a are at variance with paragraph 3.1.4 of the SDC plan. SDC have failed to consider how developing these sites will comply with its requirements with regard to Traffic and Transport policies, as detailed below

- a) MP Traffic 1. The vehicular and pedestrian/cycling routes proposed by SDC, as noted above, fail to incorporate the proposed development safely and satisfactorily into the local road network in the neighbourhood area. See Figures 3 and 4.
- b) MP Traffic 2. As noted above the development would certainly not improve traffic movement within the Parish and would be likely to cause considerable inconvenience and have potential traffic safety issues.
- c) MP Transport 1. The development proposed is not well located and will significantly increase the reliance on private cars. See Appendices 5 and 6.
- d) MP Transport 2. The development proposals do not provide access to safe and convenient walking and cycling routes to local services. In fact, the opposite is the case. See figure 3.

PS05 and PS05a are not deliverable because of the impact on the Rodborough and Minchinhampton Commons:

- a) It is not yet clear whether the measures required to avoid the predicted recreational effects on Rodborough Common SAC or Minchinhampton Common SSSI are feasible or viable;
- b) The HRA has omitted consideration of PS05a in calculating the number of houses within the recreational impact zone of Rodborough Common SAC;
- c) The HRA has failed to consider the effect of the loss of fall-back land on the ability to manage Rodborough Common SAC SSSI;
- d) The HRA has failed to consider the effect of the loss of grazing rights on the ability to manage the SAC.
- e) There has been no consideration of the loss of fall-back land and grazing rights on the ability to manage the SSSI.
- f) These policies are not consistent with the Habitats Regulations, the NPPF or Minchinhampton NDP.

We have considered the likely significant ecological effects on Rodborough and Minchinhampton Commons of policies PS05 and PS05a, with regard to the *Conservation of Habitats and Species Regulations 2017* (the Habitats Regulations) and the *National Planning Policy Framework 2019* (the NPPF).

Habitats Regulations

We have reviewed Footprint Ecology's *Habitats Regulations Assessment of Stroud Local Plan* (Regulation 19 version) dated 23 May 2021. We note:

- g) from para 6.24 that the main issues for achieving favourable condition of Rodborough Common Special Area for Conservation (SAC) are the management of livestock grazing and recreation.
- h) from the second bullet in para 6.28 that the recreational impact zone for Rodborough common SAC has recently been demonstrated to be 3.9km. The proposed developments in PS05 and PS05a are just over 2km from the edge of the SAC. These developments would therefore be obliged to demonstrate that they will not generate adverse recreational effects on the SAC.
- i) that PS05a has been omitted from Table 3 that calculates the number of proposed new houses within the recreational impact zones of the International Sites, including Rodborough Common SAC. The HRA therefore under-estimates the likely effect of the Local Plan policies.

- j) From par 6.57 that the interim strategy to protect Rodborough Common SAC must be updated before adverse effects on integrity of the SAC can be ruled out. Given the enormous increase in recreational pressure on the commons during Lockdown, it remains unclear whether adequate measures to protect the commons will be feasible or viable.
- k) that there is no exploration in the HRA of the effect of losing the farms which have grazing rights or of losing run-back land. This issue is explored further below.

Protecting the grazing management of the commons

- l) The Minchinhampton Neighbourhood Development Plan (2018) discusses the impact of development in the parish on the Commons from para 3.31 to 3.37. NDP Policy MPEnv4 includes at bullet 3:

'The Parish Council will support the protection of run-back grazing land (grazing land for cattle whilst off the common) within the parish.'

- m) This policy is principally designed to protect Minchinhampton Common Site of Special Scientific Interest (SSSI), but as the two commons are grazed as one unit, the loss of run back land in Minchinhampton Parish will also affect grazing on Rodborough Common SAC.
- n) Similar issues were raised in December 2015 in Minchinhampton Walking and Wildlife's objection to Application 2015/2631/EIAS Land at Glebe Farm Tobacconist Road:

'Small livestock farms in the area have already been lost to housing development (eg Barcelona Farm, Minchinhampton) and others are threatened with development (eg Old Vineyard, Minchinhampton). In combination, this reduction in farms with grazing rights around Rodborough Common is likely have a significant adverse effect on the system which maintains the grasslands of the Common.'

- o) There are two parts to the grazing issue. It is essential that all graziers have sufficient land to take their livestock off the common in the case of an emergency, such as an outbreak of disease. Further, it is important that farms with registered grazing rights are protected. This is because there has been no registration of new grazing rights since 1970. The loss of farms with grazing rights (such Glebe and Tobacconist Farms) is therefore likely to cause a permanent reduction in the pool of potential grazing livestock for the commons.

National Planning Policy Framework

- p) Para 175(b) states:

'Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.'

- q) The land affected by policies PS05 and PS05a is within 1km of Minchinhampton Common SSSI. This site too is susceptible to both recreational and livestock management impacts, as it supports very similar habitats to those within Rodborough Common SAC. We are not aware of any recent assessment on Minchinhampton Common of either the nature of the visitors nor of the effect on the SSSI features of visitors.
- r) These policies have not taken account of the likely effect on the SSSI of increased recreational pressure, loss of fall-back land or loss of grazing rights, as set out above.

PS05 and PS05a are not sound because they abut a scheduled ancient monument:

Scheduled ancient monument (NPPF 2, DHC6 AND ES10)

- a) PS05 immediately abuts the Bulwarks Scheduled Ancient Monument (SAM). While it may be possible – with extreme care – to build on the site without degrading this historical monument, it is almost certain that the residents of the proposed development would eventually encroach on it for recreation purposes or in order to access the adjacent playing fields.

- b) The Bulwarks is part of the larger SAM which is the largest Scheduled Ancient Monument in the country and which must be protected.
- c) **NPPF 11 (b) i** provides a caveat against development where the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area. NPPF paragraphs 194 and 195 also explain the importance of conserving heritage assets including SAMs.
- d) Stroud District Council Revised Local Plan Policies DHC6 and ES10 address the requirement for protection of historic assets.
- e) It should also be noted that in their letter of 7 February 2020, in their response to the Stroud Local Plan Review draft, the Cotswold Conservation Board said 'The Minchinhampton allocation (PS05) would be deemed to constitute major development (primarily because of its potential to have a significant adverse effect on the adjacent scheduled monument) and should therefore be withdrawn.' Stroud District Council seem to have overlooked this recommendation.

PS05 and PS05a are not deliverable because they are not consistent with the aims of the Stroud District Landscape project

Stroud District Landscape project (SO6, DHC6, ES3, ES6 and DES2)

Stroud District Council, together with the National Trust, Gloucestershire Wildlife Trust, Stroud Valleys Project, Cotswold Conservation Board, Natural England and four other stakeholders are working together on the Stroud Landscape Project which aims to improve wildlife connectivity between areas of priority grassland habitat, in this context in the areas surrounding Woodchester Park and the Commons (SSSIs/SAC). These groups and those landowners who work in cooperation with them are dedicated to restoring wildlife to farmland and thereby improving the natural resources that are so important for the future of the planet. Removing two important farming resources (Glebe Farm and Tobacconist Farm) within the area of the commons works against the principles of this project and its noble aims.

In this context, the allocation is contrary to SDC Local Plan Review policies SO6, DHC6, ES3 (loss of healthy soils), ES6 and DES2 as well as NPPF paragraphs 171 and 174.

Minchinhampton's designation as a Tier 2 settlement is not sound because of the range of services, facilities and retail outlets does not compare with other Tier 2 settlements

We do not consider the Plan is sound because it is not based on proportionate evidence with respect to Minchinhampton's designation as a Tier 2 settlement (CP3). In summary:

- a) Minchinhampton Parish council disputes Minchinhampton's status as a Tier 2 settlement
- b) Minchinhampton has too few services, facilities and retail outlets to justify Tier 2 status with infrastructure that will limit growth due to the narrow, congested streets and lack of parking
- c) Minchinhampton and Nailsworth are very different, it is impossible to understand how Minchinhampton has been ranked as a Tier 2 settlement alongside Nailsworth.
- d) Gloucestershire County Council do not treat Minchinhampton as a Tier 2 settlement and it does not receive the investment priority received by other Tier 2 settlements.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

An alternative to PS05's approach to producing social housing would be to assess the potential of the social housing already available in the Glebe Estate. There are areas which could be reorganised and / or redeveloped to increase numbers whilst improving facilities for all, including road access and safety. An example of where this was successfully delivered in Minchinhampton is the Woolaway re-development along the Cirencester Road which redeveloped 35 affordable homes.

Market housing is available in Minchinhampton at the market price. At the time of writing, there are 25 houses available on the market at a range of prices. They are within 0.25 miles of the Minchinhampton. (<https://www.rightmove.co.uk>).

We appreciate that during the COVID pandemic, site visits have not been possible, however, with restrictions now lifted, we recommend a site visit to assess the deliverability of PS05 and PS05a in light of our representation.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

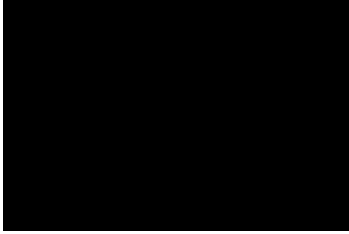
8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As members of the Minchinhampton Local Plan Response Group we would welcome the opportunity to present our case and supply further information in support of this response to the inspector.

(Continue on a separate sheet /expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signatures:


[Redacted] on behalf of the
Minchinhampton Local Response

Date:

21July2021

List of appendices

Appendix 1: Email dated 15 June 2021: correspondence from Mark Russell, Head of Planning, SDC to Geoffrey Clifton-Brown, MP

Appendix 2: The local bus timetable

Appendix 3: Topography of the land between Minchinhampton and, Stroud and Nailsworth

Appendix 1: Email dated 15 June 2021: correspondence from Mark Russell, Head of Planning, SDC to Geoffrey Clifton-Brown, MP

From: mark.russell@stroud.gov.uk
Sent: 15 June 2021 12:15
To: CLIFTON-BROWN, Geoffrey
Cc: mpenquiries@stroud.gov.uk
Subject: Local Plan – Minchinhampton (Case Ref: GC12780)

FAO Piers Baker, office of Sir Geoffrey Clifton-Brown F.R.I.C.S. M.P.

Dear Sir,

Thank you for your email of 11 June 2021 to Brendan Cleere. I have been asked to respond. The District Council values the unique landscape quality of the Cotswolds Area of Outstanding Natural Beauty (AONB) and the historic towns and villages contained within it. As local planning authority, the Council operates a general policy of development restraint within the area. The level of housing development at Minchinhampton has been very low over the last 10 years. Despite national Government requirements for Stroud District to accommodate at least 12,600 new homes over the next 20 years, at an average rate of 630 homes per annum, rather than the current Local Plan figure of 453 homes per annum, a substantial increase, the Council recognises that it is not appropriate to locate general housing growth within the AONB.

However, national policy is clear that limited development will still be needed to maintain vibrant local communities in the AONB and the Cotswolds AONB Management Plan prepared by the Cotswolds Conservation Board states that “Development in the Cotswolds AONB should be based on robust evidence of local need arising within the AONB.”

In relation to Minchinhampton, the Parish Housing Needs Survey (October 2016) identified 24 households with a local connection in need of affordable housing and 98 households seeking market housing. A new HNS is programmed to be produced later during 2021. The latest Local Housing Needs Assessment (September 2020) provides evidence to support the Council’s current policy of seeking 30% affordable housing from new development sites. On this basis, a development of up to 80 dwellings would deliver 24 affordable homes, thus delivering the local affordable housing needs identified in the survey. As this is the only site proposed at Minchinhampton in the Local Plan, this provides the only certain opportunity to deliver affordable housing to meet local needs.

In terms of sustainability, Minchinhampton is identified within the current adopted Local Plan settlement hierarchy as a second tier settlement which has the ability to support sustainable patterns of living because of its current levels of facilities and services. It is true that Minchinhampton does not have a strong employment role, although the wider parish is a significant employment provider, but it has a strong local retail role, acting as a ‘district centre’ and offering a good range of shops to serve a fairly substantial catchment of surrounding villages and hamlets. Minchinhampton also draws consumers from much further afield, due to its attractive tourism and leisure offer. The settlement has a limited role as a ‘strategic’ service provider (there is a library), but offers a very good level of ‘local’ community services and facilities. Accessibility to key services and facilities in other settlements is “fair”, with good walking times and or/public transport times (less than 15 mins) to most things apart from a supermarket, a secondary school and Stroud’s A&E / MIU. At the current time the local primary school takes school children in from a wide catchment, increasing local traffic. Providing opportunities for school children to be able to live closer to school will help to reverse unsustainable travel patterns. In terms of social sustainability, the Settlement Role and Function Update 2018 (May 2019) identified housing affordability as an acute issue in Minchinhampton. In addition, a range of other demographic trends indicate that the settlement would benefit from further development to ensure future vitality. The study concludes that “Minchinhampton and Painswick are amongst the District’s most vulnerable settlements in terms of ageing population and socio-economic trends. Reducing household size, ageing population and housing unaffordability are likely to put increasing pressure on the community’s

diversity and vitality. Targeting and tailoring any future development to address this should be a key consideration when it comes to planning any future growth or development.”

In terms of landscape impact, the proposed site is located within a larger land parcel identified in the District Landscape Sensitivity Assessment (December 2016) as Medium sensitivity to housing uses, in contrast to other areas at Minchinhampton which have High sensitivity to housing uses. The Assessment concluded that housing development, if well-conceived, could provide an improved settlement edge without detracting from the character of the settlement or impinging on open arable farmland. The existing tree line along part of the eastern boundary could be strengthened and extended to screen the settlement edge from the wider landscape. Following further landscape assessment, the Council has reduced the size of the allocation compared with proposals in 2018 and 2019, pulling it back from the southern boundary and proposes to safeguard the southern parcel for reassessment during the review of the Local Plan.

In terms of wider impacts on the environment, all proposed development sites included in the draft Local Plan are proposed to be built to sustainable construction standards in advance of current national Building Regulations, including taking their heating from low/zero carbon energy sources. The site is well located relative to the centre of Minchinhampton and vehicular access will now be solely from the north, ensuring no impact on town centre congestion. Safe, convenient walking and cycling access to the centre will be from the west and south of the development. In terms of biodiversity, the Government is currently legislating to ensure that all new developments deliver a 10% net benefit to local biodiversity. The District Council currently operates a mitigation strategy to ensure Rodborough Common is not damaged by increasing recreation use of the commons and this development will be required to contribute to management projects to protect local flora and fauna, including the continued use of cattle to support the management of the commons.

The Council has worked with organisations including Natural England, the Cotswolds Conservation Board and parish councils through the Local Plan Review to identify appropriate policies and proposals for the District. The views of these organisations have not been ignored. However, where there is evidence of local housing need the District Council is bound by national and local policy to seek to meet those local needs. The Council approved its Pre-Submission Local Plan in April 2021 and the Plan is currently subject to public consultation. You can access the consultation via the Council’s webpages [herehttps://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review](https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review). The views of these organisations and members of the public are awaited on the Council’s proposals and will be passed to an independent Inspector who will consider the Plan once it has been submitted for examination in September 2021. The recommendations of the Inspector are binding upon the Council.

The Council would strongly recommend that your constituent uses the current consultation arrangements to express their views as this is the statutory process for addressing objections to a Local Plan.

I hope you find this a helpful response to your constituent’s concerns.

Yours sincerely,

Mark Russell
Head of Planning Strategy
Stroud District Council
Ebley Mill, Ebley Wharf
Stroud, Gloucestershire. GL5 4UB

W www.stroud.gov.uk<http://www.stroud.gov.uk/>

Working together to make Stroud district a better place to live, work and visit

Appendix 2: The local bus timetable

69 & 620 from Bath to Old Sodbury connecting to Stroud



from 24 January 2021

	Mondays to Fridays									Saturdays								
	620 ▲	620 ▲	620	620	620	620	620	620	620	620	620	620	620	620	620	620		
Bath Bus Station [3]	0730	0735	1035	1335	1645	1745				1035	1335	1645	1745					
Lansdown Blatway Arms	0745	0750	1050	1350	1700	1800				1050	1350	1700	1800					
Wick Rose & Crown	0752	0757	1057	1357	1707	1807				1057	1357	1707	1807					
Pucklechurch Fleur de Lys	0804	0809	1109	1409	1719	1819				1109	1409	1719	1819					
Westerleigh Broad Lane	0811	-	-	-	-	-				-	-	-	-					
Westerleigh War Memorial	0812	0815	1115	1415	1725	1825				1115	1415	1725	1825					
Yate International Academy	0818	-	-	-	-	-				-	-	-	-					
Yate Goldcrest Road	-	0821	1121	1421	1731	1831				1121	1421	1731	1831					
Yate Shopping Centre [arr]	0821	0826	1126	1426	1736	1836				1126	1426	1736	1836					
Yate Shopping Centre [B]	0825	0830	1130	1430	1740	1840				1130	1430	1740	1840					
Chipping Sodbury School	0830	-	-	-	-	-				-	-	-	-					
Chipping Sodbury The Clock	0835	0835	1135	1435	1745	1845				1135	1435	1745	1845					
Old Sodbury Cross Hands	0842	0842	1142	1442	1752	1852				1142	1442	1752	1852					
	▼	▼	▼	▼	▼	▼				▼	▼	▼	▼					
Old Sodbury Cross Hands	69	69 ▲	69 ▲	69	69	69 ▲	69 ▲	69	69	69	69	69	69	69	69	69		
Old Sodbury Cross Hands	0845	0845	1145	1445	1755	1855				1145	1445	1755	1855					
Didmarton Kings Arms	0856	0856	1156	1456	1806	1906				1156	1456	1806	1906					
Westonbirt Arboretum	0901	0901	1201	1501	1811	1911				1201	1501	1811	1911					
Tetbury Bank	0708	0908	0908	1108	1208	1508	1808	1908	0708	0908	1108	1208	1508	1808	1908			
Tetbury Highfields	0713	0913	0913	1113	1213	1513	1813	1913	0713	0913	1113	1213	1513	1813	1913			
Tetbury Sir William Romney School	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Avening Mays Lane	0725	0925	0925	1125	-	1525	1835	1935	0725	0925	1125	-	1525	1835	1935			
Avening Memorial Hall	-	-	-	1225	-	-	-	-	-	-	-	1225	-	-	-	-		
Nailsworth Bus Station [2]	-	-	-	1236	-	1656	-	-	-	-	-	1236	-	1656	-	-		
Box Halfway House Inn	-	-	-	1241	-	1701	-	-	-	-	-	1241	-	1701	-	-		
Hampton Fields Gatcombe Corner	0728	0928	0928	1128	-	1528	1838	1938	0728	0928	1128	-	1528	1838	1938			
Minchinhampton Square	0736	0936	0936	1136	1246	1546	1706	1846	0736	0936	1136	1246	1536	1706	1846	1946		
Minchinhampton Ricardo Road	0739	0939	0939	1139	-	1539	1849	1949	0739	0939	1139	-	1539	1849	1949			
Rodborough Bear Inn	-	-	-	-	-	1554	-	-	-	-	-	-	1544	-	-	-		
Bowbridge Thrupp Lane	0747	0947	0947	1147	1257	1544	1717	1857	0747	0947	1147	1257	1717	1857	1957			
Stroud Merrywalks	0754	0954	0954	1154	1304	1554	1604	1724	0754	0954	1154	1304	1554	1724				

69 & 620 from Stroud to Old Sodbury connecting to Bath



from 24 January 2021

	Mondays to Fridays									Saturdays								
	69	69 ▲	69 ▲	69	69	69 ▲	69 ▲	69	69	69	69	69	69	69	69	69		
Stroud Merrywalks [K]		0805	0805	1005	1105	1405	1405	1625	1735		0805	1005	1105	1405	1625	1735		
Bowbridge Garage	0610	-	-	1010	1110	1410	1410	1630	1740	0610	-	-	1010	1110	1410	1630	1740	
Rodborough Bear Inn	-	0814	0814	-	-	-	-	-	-	-	0814	-	-	-	-	-		
Minchinhampton Ricardo Road	0620	0820	0820	-	1120	1420	1420	1750	-	0620	0820	-	1120	1420	1750	-		
Minchinhampton Square	0623	0823	0823	1023	1123	1423	1423	1643	1753	0623	0823	1023	1123	1423	1643	1753		
Box Halfway House Inn	-	-	-	1027	-	-	-	1647	-	-	-	-	1027	-	-	1647		
Nailsworth Bus Station [2]	-	-	-	1032	-	-	-	1652	-	-	-	-	1032	-	-	1652		
Hampton Fields Gatcombe Corner	0629	0829	0829	-	1129	1429	1429	1759	-	0629	0829	-	1129	1429	1759	-		
Avening Mays Lane	0632	0832	0832	1042	1132	1432	1432	1802	-	0632	0832	1042	1132	1432	1802	-		
Tetbury Sir William Romney School	-	-	-	0840	-	-	-	-	-	-	-	-	-	-	-	-		
Tetbury Highfields	0643	0843	-	1053	1143	1443	1443	1813	-	0643	0843	1053	1143	1443	1813	-		
Tetbury Newsagent	0650	0850	0850	1100*	1150	1450	1450	1820	-	0650	0850	1100*	1150	1450	1820	-		
Westonbirt Arboretum	0656	0856	0856	-	1156	1456	1456	-	-	0656	0856	-	1156	1456	-	-		
Didmarton Kings Arms	0701	0901	0901	-	1201	1501	1501	-	-	0701	0901	-	1201	1501	-	-		
Old Sodbury Cross Hands	0713	0913	0913	-	1213	1513	1513	-	-	0713	0913	-	1213	1513	-	-		
	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼	▼		
Old Sodbury Cross Hands	620	620	620 ▲	620 ▲	620	620 ▲	620 ▲	620	620	620	620	620	620	620	620	620		
Chipping Sodbury The Clock	0615	0715	0915	0915	1215	1515	1515	-	-	0715	0915	-	1215	1515	-	-		
Chipping Sodbury School	0623	0723	0923	0923	1223	1523	1523	-	-	0723	0923	-	1223	1523	-	-		
Yate Shopping Centre [arr]	0626	0726	0926	0926	1226	1526	1531	-	-	0726	0926	-	1226	1526	-	-		
Yate Shopping Centre [A]	0630	0730	0930	0930	1230	1530	1535	-	-	0730	0930	-	1230	1530	-	-		
Yate Goldcrest Road	0633	0733	0933	0933	1233	1533	-	-	-	0733	0933	-	1233	1533	-	-		
Yate International Academy	-	-	-	-	-	-	1538	-	-	-	-	-	-	-	-	-		
Westerleigh War Memorial	0640	0740	0940	0940	1240	1540	1543	-	-	0740	0940	-	1240	1540	-	-		
Westerleigh Broad Lane	-	-	-	-	-	-	1544	-	-	-	-	-	-	-	-	-		
Pucklechurch Fleur de Lys	0647	0747	0947	0947	1247	1547	1552	-	-	0747	0947	-	1247	1547	-	-		
Wick Rose & Crown	0657	0759	0959	0959	1259	1559	1604	-	-	0759	0959	-	1259	1559	-	-		
Lansdown Blatway Arms	0707	0807	1007	1007	1307	1607	1612	-	-	0807	1007	-	1307	1607	-	-		
Bath Bus Station	0722	0827	1022	1022	1322	1622	1627	-	-	0827	1022	-	1322	1622	-	-		

Key
▲ School holidays only
▲ School days only
- Stop not served

▼ These buses are guaranteed to connect, with through fares available.
 * - This journey runs from Tesco via London Rd & Cirencester Rd, arriving at Tetbury Bank, not Newsagent Service 969 is open to Sir William Romney students only.

In addition, buses run to Cirencester and Tetbury during term time

Appendix 5: Topography of the land between Minchinhampton and, Stroud and Nailsworth

PS05 and PS05a are 190m above sea level, nearest settlement (Nailsworth) is two miles away at the bottom with an elevation of 50m. Estimated walking time between centre of Nailsworth and Minchinhampton, taking the gradient into consideration, is 1 hour (estimated using the ordnance survey app).

Stroud is 40m above sea level and a 4-mile walk along footpaths and unlit roads, it is a 2 hour walk to Minchinhampton, taking the gradient into consideration (estimated using the ordnance survey app).

