

STROUD DISTRICT LOCAL PLAN REVIEW

Written Statement

In response to the Matter 2 of the Matters, Issues and Questions

On behalf of Mrs R. Bish and Mr F. Russell

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1.0 Introduction

- 1.1 SF Planning have prepared this written statement in response to the Inspectors Matters, Issues and Questions produced to guide the Examination in Public into the Review of the Stroud Local Plan.
- 1.2 The following written statement has been prepared on behalf of our clients Mrs R. Bish and Mr F. Russell and comments on the soundness of the plan, particularly in relation to the settlement of Minchinhampton and level of proposed allocations for development.
- 1.3 Our clients own a site that lies adjacent to the safeguarded site PS05a at Woefuldane Bottom, Minchinhampton see figure 1 below, but is not currently included within any allocation.



Figure 1 The Site

1.4 It is our position that this site should be allocated, either as part of a wider allocation PS05 or PS05a; or as a small site stand-alone allocation for residential use.

2.0 Question 22

2.1 Ouestion 22 of matter 2 asks:

> The text on page 23 of the Plan also states that limited housing within the AONB will be supported to meet needs arising from within the AONB.

- a. Is this clearly set out in policy and if so, how will this be assessed by a decision-maker determining future planning applications?
- b. Is this approach consistent with paragraphs 176 and 177 of the Framework in regard to the AONB?
- 2.2 We feel this is contradictory to the planning strategy approach being undertaken through the review of the Stroud Local Plan. Stroud District Council have opted to not meet their fully identified housing needs, but to meet their capped housing requirement. This leaves a portion of the community's housing needs unmet over the plan period.
- 2.3 Although it is recognized that this is an approach that is supported by national policy and guidance, it would be better if full housing requirements can be identified and met, and not left to a review of the Local Plan in five years' time, effectively kicking the responsibility down the road.
- 2.4 Not meeting housing needs in full, when there are sites available for allocation to help meet needs on a small scale within the AONB does not seem to represent positive planning. Furthermore, through allocation, the Local Plan would provide a forum whereby a coordinated approach to considering constraints, including impact on the AONB and other technical matters such as access can be addressed across all sites in this part of Minchinhampton.

- 2.5 Minchinhampton is identified as one of the larger settlements in Stroud District after the town centres of Cam and Dursley, Stonehouse and Stroud and is identified as being a vulnerable large settlement in the 2018 update to the Stroud District Settlement Role and Function Study (EB72 in the examination library), due to ageing population and socio-economic trends.
- 2.6 Furthermore, the constrained nature of the land at Minchinhampton has exacerbated this problem over the years, with limited growth having taken place in the settlement comparatively, this is mainly due to the AONB constraining development.
- 2.7 Therefore, we would question whether it is appropriate to only allocated a site for 80 dwellings in an area in need of greater support for its economy and community generally.

3.0 Question 28

3.1 Question 28 asks:

> Has the site selection process been suitably informed by relevant studies/assessments and site constraints, and has it included a robust assessment of development impacts?

- 3.2 With specific reference to the Area of Outstanding Natural Beauty we feel that relevant case studies have been undertaken which provide an appropriate assessment on which to base the Local Plan allocations on.
- However, the approach to site selection does not appear to have followed the findings 3.3 of the study undertaken to assess landscape and visual impact of potential sites adjoining the settlement of Minchinhampton.
- 3.4 The Evaluation of site landscape and visual issues study (EB38 in the examination library) assessed a number of parcels of land, within one big site in Minchinhampton, including our clients land at Woefuldane Bottom as well as the currently proposed allocation PS05, and the currently proposed safeguarded land PS05a. The assessment concluded that this area was of medium sensitivity, and that due to its location, only localized views would be impacted by development in this area.
- 3.5 Other locations around Minchinhampton either had greater sensitivity or would have a greater impact than that of the area in question.
- 3.6 Despite this the Council have restricted the allocation to that shown in PS05 only.
- 3.7 In terms of landscape sensitivity there is no evidence to suggest that the Land at Woefuldane Bottom should not be allocated for development.

4.0 Summary and Conclusion

- 4.1 In conclusion, the impact on the AONB has been considered through the evidence base supporting the Stroud Local Plan review, however it is not felt that the findings of the evidence has been fully considered in the drafting of the Plan. The evidence suggests that the area around Minchinhampton encompassing the current PS05 allocation, safeguarded land at PS05a and my clients land has a medium landscape sensitivity and development would only have a localized impact. A larger allocation could therefore be considered.
- Full housing needs should be addressed through this plan, rather than being left 4.2 unmet until a later plan review, and therefore a larger allocation at Minchinhampton to include my clients land should be considered.
- 4.3 This would also help to address the concerns over Minchinhampton being identified as a vulnerable settlement due to restricted growth in the past.

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