
Minchinhampton Consultation

Response Schedule

Prepared by Savills on behalf of Stroud District Council

4 November 2008



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<p>Methodology appropriate but consideration should also be given to sites identified pre-2000 by Minchinhampton Parish Council.</p>	<p>We have taken into account the work undertaken by the Parish Plan Action Group in identifying potential sites for affordable housing, but have not reviewed the previous work by the Parish Council as this was undertaken some time ago, and is now considered to be out of date.</p> <p>However, we have only used the information from the Parish Plan Action Group to feed into the site identification process. Following the identification of every potential site, each has then been assessed against the same criteria. Therefore, we have not used the conclusions or results of previous site search exercises to influence our selection of the preferred site.</p>
<p>Assessment process should not have included sites such as the Great Park.</p>	<p>In undertaking the site search exercise we considered all potential sites which we could identify, both within and on the edge of Minchinhampton and within the settlement boundary of Brimscombe.</p> <p>In so doing, we made the conscious decision at the outset of the project not to disregard any site until we had thoroughly and objectively analysed each of them against a series of criteria. We consider this approach to be essential to ensure that all options are considered objectively prior to coming to a decision over which site is the most suitable for affordable housing.</p> <p>Within this methodology, a number of sites, including the Great Park, have been included in the initial “suitability” assessment exercise. Whilst there are a number of reasons why this site and others on the edge of Minchinhampton are not suitable for affordable housing development, their inclusion within the assessment at this stage is, we believe, essential to demonstrate that all possibilities have been assessed fairly and the most suitable site identified.</p>



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<p>It is misleading to issue a map at the drop in sessions which does not show the settlement boundary.</p>	<p>This issue was also raised during the first day of the consultation exercise and we acknowledge that it would have been helpful to include the settlement boundary on the plan. For that reason, for subsequent days we attached a copy of the relevant local plan proposals map to the exhibition board adjacent to the site plan in order that people attending could review the settlement boundary if they so desired.</p> <p>Notwithstanding, due to the nature of the exercise, and the explanation on the previous boards we do not consider that the lack of settlement boundary on the plan undermined the exercise.</p>
<p>Methodology unclear.</p>	<p>Information was provided on the exhibition display boards relating to the methodology used for the site assessment process. The draft version of the report was also subsequently posted on the Council website which contained full details of the methodology. Furthermore, members of the Savills Planning team who were responsible for the preparation of the report were on hand throughout the public exhibition to answer any queries regarding the methodology or approach. For these reasons we consider that there was sufficient explanation of the methodology provided.</p>
<p>Contrary to paragraph 3.9 of the Site Search Report, a previous review of suitable site locations for affordable housing was not carried out by the Parish Council.</p>	<p>We are now aware that a review of suitable site locations was carried out by the Parish Plan Action Group but was not considered by the entire Parish Council. In response to this, paragraph 3.9 of the Site Search Report has been changed and reference to the Parish has been removed.</p> <p>Notwithstanding, we do not feel that this change to the report affects the site finding exercise in any way. As part of the overall site search, each of the sites identified by the Parish Plan Action Group would have been picked up and assessed in any case.</p>



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<p>Further consultation with local residents and groups within Minchinhampton should have been undertaken.</p>	<p>The exercise hosted at the Porch Rooms provided a good opportunity for local people to provide their input and comments into the consultation process. The approach proposed is considered to be suitable for the nature of the exercise and we do not therefore consider that any additional public consultation is necessary at this stage.</p> <p>Once a site has been selected, a further public consultation exhibition will be held addressing the particular design issues and details relating to that site.</p> <p>Once a planning application is submitted for the selected site there will be a further consultation prior to the application being determined.</p>
<p>A number of the sites identified will prove impractical due to inaccessibility of the location.</p>	<p>We agree that a number of the sites in and around Minchinhampton are unsuitable for development due to the limited accessibility of the location. Where this is the case, the sites have been discounted on these grounds.</p>
<p>Most aspects of the type of site that might be available have been considered.</p>	<p>Through discussions with our client (Stroud District Council) we have agreed that the methods used were the most appropriate in identifying the most suitable site for affordable housing.</p>
<p>Presented very clear and easy to understand. Search appears to have been very thorough.</p>	<p>Through discussions with our client (Stroud District Council) we have agreed that the methods used were the most appropriate in identifying the most suitable site for affordable housing.</p>
<p>Consideration should have been</p>	<p>One of the key considerations in assessing the suitability of each of the potential sites is the impact that</p>



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<p>given to the impact of development on the value of surrounding houses and type of house already in the area.</p>	<p>the development will have upon the residential amenity of the occupiers of neighbouring properties. Indeed, some sites which were identified initially were subsequently discounted on this basis.</p> <p>However, the impact on a neighbouring property's value is not a matter that can be considered when a planning application is submitted and therefore is not a consideration which we consider to be appropriate to take into account in the site search exercise.</p>
<p>Insufficient detail available to make judgement.</p>	<p>It was not possible to provide full details of our assessment of each site within the exhibition material, however a copy of the draft report was subsequently made available on the Council website. This provided further detail of our assessment of each of the sites.</p> <p>Furthermore, members of the Savills Planning team who were responsible for the preparation of the report were available at the exhibition in order to answer any queries regarding particular sites and add further details in response to individual queries raised.</p>
<p>The investigation is lumping poor and cheap [housing] together.</p>	<p>No assessment was made of the value of existing properties as part of the site suitability assessment process. It is certainly not the intention of this process to "lump poor and cheap together". The site search process was undertaken objectively and designed to identify the most suitable and sustainable site for affordable housing.</p>
<p>The sites were easily identifiable and consultants should not have been appointed to undertake this</p>	<p>Savills were appointed as a consultant to provide an objective and unbiased view on the most appropriate site for affordable housing.</p>

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exercise.	
The sites identified were predictable.	The consultation exercise is a key part of the process in identifying the most suitable, achievable and available site for affordable housing. Whilst it may appear that the results were predictable to some individuals, a thorough and objective analysis is required in order to support the planning application for affordable housing once submitted. It is for this reason that the methodology has been designed to be clear and robust.
Whether additional sites should have been identified at Brimscombe.	<p>Only part of the Brimscombe urban area is within the Parish of Minchinhampton. Since the housing needs survey upon which the affordable housing provision is predicated covered the Parish of Minchinhampton only, only those sites within the Parish were identified to address this need.</p> <p>Whilst we are aware that additional major development may be coming forward at Brimscombe, and in other locations within the District, any affordable housing provided within those sites will assist in meeting the wider need for affordable housing within the District, and not the needs identified through the Parish-wide housing needs survey.</p>
Provision of affordable housing at Barcelona Farm, Stuart House and Box Crescent would have addressed a proportion of the housing need.	<p>No affordable housing was provided at Barcelona Farm through the development as there was no planning policy requirement for affordable housing at the time.</p> <p>With regards Stuart House and Box Crescent, both these developments were below the threshold for affordable housing provision and hence there was no policy requirement for the provision of affordable housing.</p>



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<p>Insufficient level of research conducted into site ownership.</p>	<p>For each site identified as having potential medium or high suitability, the availability was assessed to see if the landowner would be willing to sell the land for a price of £5,000 per housing plot. Ownership was assessed through a series of Land Registry searches. In many cases, the Land Registry search provided landowner information whilst other searches identified the land as unregistered. We feel that this method was suitable and that further measures would not have been appropriate at this stage in the process.</p> <p>Where a site was identified as having medium or high potential and the Land Registry search revealed that the land was unregistered we discussed with the Local Authority and Parish Council whether they had any further information on land ownership. In two cases we were unable to identify the landowner through the approach set out above and thus at the Public Consultation event highlighted these two areas as being potentially suitable, however due to uncertainty over landownership we asked members of the public to provide any details they could on the landowners. Following the consultation event we followed up the information received at the consultation and wrote to the people identified as the potential owners.</p> <p>Overall we consider the level of research undertaken to identify land ownership was appropriate and sufficient for the scope of the exercise.</p>

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<p>The exhibition made no mention of the Area of Outstanding Natural Beauty, nor of the fact that Sites of Special Scientific Interest could be involved.</p>	<p>No specific mention was made of the presence of the Area of Outstanding Natural Beauty on the exhibition material, however we do not believe that this has any impact on the outcome of the report. The whole of Minchinhampton is within the Area of Outstanding Natural Beauty, including both land within and adjacent to the settlement boundary. Each of the potential sites were assessed for their suitability, and one of the key considerations within this assessment is the impact of development on the surrounding landscape. Therefore, the impact on the AONB was taken into account during the assessment process.</p>
<p>The main consideration is cost and it is cheaper to build on green field than brownfield land.</p>	<p>None of the sites identified during the site search process were discounted on the basis of costs of development or land costs. However, given that affordable housing providers are awarded central government grant funding to deliver affordable housing, it is imperative that an appropriate amount is paid for the selected site. On that basis we asked all those landowners with suitable sites whether they would be willing to dispose of the land for a total of £5,000 per plot.</p> <p>This approach is clearly documented in the draft report which was made available on the District Council website.</p>
<p>The consideration of various sites was not consistent.</p>	<p>We acknowledge that in some cases the terminology used within the report was not identical for each of the sites assessed. We have subsequently reconsidered the terminology used and where appropriate, revised the document.</p>

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<p>Sites 1, 2, 3, 4 or 5 should have the comments (divorced from the existing settlement boundary and would appear as an obtrusive extension into the open countryside) and identified as low priority.</p>	<p>We acknowledge the comments made, however we do not necessarily agree that the same conclusions apply equally to sites 1, 2, 3, 4 and 5. We have reconsidered the assessment within the report to ensure accuracy, and where appropriate, consistency. However it is our view that each site must be considered on its individual merit, and where suitability of those sites varies this should be reflected in the report.</p>
<p>There should have been a ranking system for the level of impact on the AONB.</p>	<p>Whilst the report did not specifically highlight the fact that all of the sites identified at Minchinhampton are within the AONB, we have nevertheless considered the impact of development on the landscape issues. This formed a major part of the suitability analysis undertaken at the first stage of the assessment. It is our view that we have therefore addressed the landscape impact sufficiently through the assessment process.</p>
<p>Minchinhampton Parish Council should be consulted on the order of priority and or preference for the sites that are to be put forward.</p>	<p>Minchinhampton Parish Council had a separate session as part of the Consultation Exhibition and therefore had the opportunity to input into the assessment process, including upon the site priorities.</p>
<p>The survey should have considered the whole Parish and</p>	<p>The site assessment process considered all sites both within and on the edge of Minchinhampton that were identified as part of the assessment process. A number of additional sites identified by attendees</p>

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not be confined to Minchinhampton.	<p>of the Consultation event were also subsequently assessed to determine whether they had any potential. We therefore believe that all potential and feasible sites were considered.</p> <p>For the reasons sets out in our Draft Report it was not considered appropriate to consider the more rural settlements within the Parish as these would result in a less sustainable form of development.</p>
There is unreasonable bias towards the Tynings field due to the Woolaway situation.	<p>Whilst we are aware of the situation with the Woolaways housing, this position in no way influenced the site assessment process or results arising from the appraisal of individual sites. The methodology followed was in our view a clear, robust and objective assessment of the suitability of each of the potential sites identified. This led to the identification of sites 22, 13 and 14 as being the high priority locations. There was no bias towards any of the sites assessed.</p>
A mix of housing should be provided.	<p>Whilst it could be argued that there is a need for open market housing in addition to affordable housing at Minchinhampton, our remit was to identify an appropriate site to meet the need for affordable housing only and on this basis we do not propose a mix of housing tenures. Any new houses will however, be a mix of sizes to reflect the identified local need.</p>
Minchinhampton is not a suitable location for more housing due to impact on existing services and facilities.	<p>Further investigations are currently being undertaken into the availability of services and facilities within Minchinhampton to determine whether there is capacity to accommodate development, or whether additional provision will be needed to meet rising demand. Our initial assessment of school provision is that there is a declining school population at Minchinhampton and thus the provision of additional housing will in fact assist in ensuring the long-term future of the primary school.</p>

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<p>Additional affordable housing at Minchinhampton will destroy the character of the area, reducing plot sizes.</p>	<p>The retention of the character of Minchinhampton is a key consideration in identifying the most appropriate and suitable site for affordable housing development. As part of the assessment process we have reviewed the impact of all potential sites on the conservation area and discounted those which we believe would have a detrimental impact. It is our view that the three sites identified as high priority would not have a harmful effect upon the character of the settlement and would enable the delivery of affordable housing in a sensitive and appropriate fashion.</p>
<p>Sites at Stroud and Brimscombe should also be considered for affordable housing.</p>	<p>The affordable housing needs survey undertaken for the Parish of Minchinhampton identified a specific need for new affordable housing within the Parish boundary. It is the objective of the Council to deliver the additional affordable housing to meet this need in the place where the need arises. There are additional affordable housing needs both within Stroud and Brimscombe, and also within the wider District Council administrative area. These needs will be addressed through other means.</p>
<p>No further development is required or wanted in Minchinhampton.</p>	<p>There is an identified need for additional affordable housing within Minchinhampton and a number of responses to the consultation exercise indicate that they would welcome additional development. There is therefore a mixed view amongst local residents as to whether additional development is or is not desirable.</p>
<p>Affordable housing development should not be permitted on greenfield land.</p>	<p>The housing needs survey clearly identified a need for housing within the Parish of Minchinhampton. In order to identify the most suitable location to address this need we have assessed all potential sites both within and adjacent to the settlement boundary. Whilst in many respects a brownfield site may be considered more suitable for development, such development may not be achievable, or the land not</p>



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	<p>available for the proposed development. As such, we have therefore also considered all greenfield sites which, under the local plan policy, could potentially come forward as a rural housing exception site.</p> <p>Savills have been appointed to identify the most suitable site and in so doing have therefore taken into account all the potential options including brownfield and greenfield opportunities.</p>
<p>The new housing will not be affordable.</p>	<p>The affordable housing proposed at Minchinhampton would not be available on the open market and an interest in each of the completed properties would be retained by a registered social landlord. The housing provided would therefore be affordable, and would remain affordable in perpetuity.</p>
<p>The information on the exhibition was misleading and difficult to understand.</p>	<p>Considerable effort was put into the preparation of the exhibition boards to make sure that they were as clear, logical and easy to understand as possible. Where any queries were raised at the exhibition, members of the Planning Team at Savills were on hand to answer and advise. Many people commented that they found the exhibition very useful, informative and understandable.</p>
<p>Affordable housing needed in Minchinhampton, given the number on the Council waiting list a development of 20 dwellings may not be sufficient to meet existing need. The credit crunch will exacerbate housing need and the housing needs survey did not</p>	<p>Whilst the Housing Register contains far greater than the 20 dwellings which were identified in the housing needs survey, it is imperative that the affordable housing development is based on robust and sound research. For that reason, the scale of development proposed has been based upon the findings of the Parish wide housing needs survey.</p>

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adequately identify hidden needs.	
Minchinhampton is a small market town and does not therefore qualify for affordable housing on a rural exception site.	Our view, as explained in the Site Assessment Report, is that the policy relating to rural housing exception sites in the Adopted Local Plan does not preclude the delivery of affordable housing on any settlement with a population below 3,000 dwellings such as Minchinhampton. Whilst Minchinhampton is not specifically identified as a settlement at which the rural housing exception site policy will apply, nor equally does the policy exclude development of this form. We are satisfied that the policy permits the development of a rural housing exception site at Minchinhampton.
The housing needs evidence identifies only 16 and not 20 households in need.	Following the Consultation event further clarification on the level of housing need has been sought from Gloucestershire Rural Community Council. Written correspondence dated 24 September 2008 from the Gloucestershire Rural Community Council confirms that the evidence available from the housing needs survey does indeed justify 20 affordable dwellings.
I agree strongly with the needs for affordable housing. It is imperative that affordable housing is provided in order to ensure a balanced and thriving rural society in Minchinhampton.	Affordable housing to meet the needs of local households who cannot afford to buy or rent on the open market is in our view essential in order to ensure a balanced and sustainable community.
Site 22 is the most appropriate.	We have taken on board all the comments received and following further, more detailed consideration of



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<p>Site 22 would have:</p> <ul style="list-style-type: none"> • An impact upon the local landscape • Is the wrong side of Cirencester Road to access the services and facilities within the settlement • Would impact upon the recreational use of the Tynings • Would have a detrimental effect on nature conservation interests. • Is outside the settlement boundary. • Would lead to urban sprawl. • Access would be difficult and potentially dangerous. 	<p>this and the other high priority sites, it has been decided that site 22 is the less preferable option for affordable housing development.</p> <p>We have taken on board all the comments received and following further, more detailed consideration of this and the other high priority sites, it has been decided that site 22 is the less preferable option for affordable housing development.</p>



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<p>Site specific comments relating to land identified as having low or medium priority.</p>	<p>A number of comments were received during the consultation period regarding the suitability assessment of a number of the sites identified in our draft Report as having either low or medium priority. None of the comments received change the conclusions relating to these sites and since it is not proposed to pursue further any of these sites, we have not addressed these issues within this Report.</p>
<p>No development should take place to the north of Cirencester Road.</p>	<p>A number of attendees at the Consultation Exhibition contended that it has always been accepted that no development should take place to the north of Cirencester Road. We are not aware of the planning policy background to this assumption or its provenance.</p> <p>In our assessment of each of the potential sites we have considered all the relevant planning considerations to identify the most suitable site(s) for development. Where development in a particular location would have a detrimental impact, as a material planning consideration this will be reflected in the suitability assessment of that site and therefore all potential development sites have been considered against the same criteria.</p> <p>The location of a site to the north of Cirencester Road has not been a reason in itself to discount it as being unsuitable. However, where the development would have a detrimental impact, as a planning consideration this would be reflected in the suitability assessment.</p>
<p>The high priority sites identified are the most suitable.</p>	<p>For the reasons set out in our report, we consider the high priority sites are the most suitable for affordable housing development.</p>



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<p>Sites 13 and 14 are the most appropriate and suitable for affordable housing development.</p>	<p>After identifying sites 13 and 14 as high priority along with site 22, a further more detailed investigation has been undertaken on the suitability of the high priority options. This more detailed assessment has found sites 13 and 14 to be more appropriate for affordable housing than site 22 and thus the conclusion within the Report is that it is these sites which should be taken forward through the planning application process.</p>
<p>I would like to see this coordinated with other housing development projects that are taking place within a similar timescale – with a view to putting something back into the community, for example the Rugby Club (seniors and juniors) need a field to play and train on.</p>	<p>The planning system enables the Local Planning Authority to seek contributions to address the need for certain services and facilities where the development would generate specific needs. The Local Planning Authority are however only permitted to seek contributions where the need was directly related to the proposed development. For this reason, at the planning application stage the Local Planning Authority will assess the impact of the proposed development on services and facilities.</p>
<p>Sites 13 and 14 should not take place because:</p> <ul style="list-style-type: none"> • Access and drainage are already overloaded. 	<p>Access and drainage issues relating to sites 13 and 14 will be considered in detail at the design stage in preparation for the submission of a planning application. It is not considered that these considerations preclude development on the site, however if additional works are required to increase capacity these can be undertaken as part of the development process.</p> <p>With regards to the scale of the Glebe Estate, whilst some may consider the existing development to be</p>

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<ul style="list-style-type: none"> The Glebe Estate is already very large. 	<p>large, we do not believe that this is a strong planning reason to resist further development, if the site identified through an objective assessment process is the most suitable for affordable housing development.</p>
<p>Additional development will be detrimental to natural drainage.</p>	<p>Any development proposals which come forward will need to take into account the impact of the proposed development on surface water drainage. If the development causes any concern in this respect, mitigation measures will be implemented to ensure that there is no harmful effect overall.</p>
<p>Redevelopment of the Woolaways at a higher density is preferable to building on greenfield land.</p>	<p>The shortage of affordable housing and the need to redevelop or refurbish the Woolaway properties are separate issues, both of which need to be addressed.</p> <p>A report prepared on behalf of the District Council by Tribal Consulting assessed the costs of re-providing the same level of affordable homes within the Woolaways site. This report found there to be a significant financial deficit in demolition and re-provision of affordable housing. Any redevelopment on the Woolaways site is therefore likely to comprise of open market and affordable housing. Open Market housing would need to be included in order to cross subsidise the provision of the affordable homes.</p> <p>However, there is, as yet, no certainty regarding the future of the Woolaways homes, and in our view, it would not be prudent to assume that redevelopment would increase the density at the Woolaways at the present time. For these reasons, the potential for redevelopment and increased density of the Woolaways has been discounted as an option for providing additional affordable housing.</p>



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<p>The following additional potential sites were identified for consideration of part of the site assessment process:</p> <ul style="list-style-type: none"> • The old police houses in Butt Street. • Aston Down Airfield. • Minchinhampton, Doctors surgery. • The Brickworks site. • George Pearce House. • The empty factory unit at Brimscombe Corner. • Brimscombe Port. • The youth club on Tobacconist Road. 	<p>All the potential additional sites have been formally considered and assessed against the same criteria used to analyse the sites within the initial draft Report. A proforma has been completed for each site and the sites added to the summary table in section 4 of the main Site Search Report.</p> <p>Our assessment of the proposed potential alternative sites revealed that none of the sites assessed were identified as being of high priority. This is because they were either considered unsuitable or the availability assessment found that they were unavailable.</p> <p>In following the methodology for the Site Search Exercise only sites within the Parish of Minchinhampton and adjacent to the settlement boundaries of Minchinhampton and Brimscombe have been considered. Some of the additional sites suggested have not been formally considered as they are not consistent with planning policy..</p>

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<p>Insufficient publicity of Consultation event.</p>	<p>A decision was taken regarding the extent of the publicity for the public consultation event which was agreed with Stroud District Council prior to the event taking place. It is our view that the scale of publicity, which included an article in the local newspaper, posters at key locations in Minchinhampton and letters to all the relevant stakeholders, including the Parish Council, was sufficient to ensure that the event was well publicised. Furthermore, following the completion of the consultation event, the exhibition boards and feedback forms were subsequently made available in the local library, Parish Council office and District Council reception. This enabled those who were not able to attend the event to review the material thereafter. The consultation material, including the draft Site Assessment Report was also published along with a consultation feedback form on the District Council website.</p> <p>The consultation period of 2 weeks we consider to be more than sufficient to elicit all comments. This consultation period was subsequently extended an additional week to enable further consideration of the exercise at the Minchinhampton Parish Council meeting. All comments received from stakeholders and members of the public have been analysed and the responses taken into consideration.</p>
<p>Consideration should be given to sustainability and the proximity of the alternative sites to the services and facilities within the centre of Minchinhampton.</p>	<p>At the outset of the assessment exercise we considered whether to assess the proximity of sites to the centre of Minchinhampton, however, it was decided that given the scale of the development, and the distances involved, that all the sites identified at Minchinhampton would have reasonable access to the services and facilities in the town and therefore no distinction was made on this basis.</p>



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<p>Access to main roads is an important consideration.</p>	<p>The accessibility of each of the potential sites was a key component in the suitability analysis. Where unsuitable access was considered to preclude the future development of a site this reason was in itself considered sufficiently important to render the site unsuitable. This consideration was therefore taken into account in the site assessment process.</p>
<p>New homes should be sustainably constructed and ideally carbon neutral.</p>	<p>There are sustainability standards which registered social landlords are obliged to comply with in the construction of all new housing. These requirements will apply to the development of affordable housing at Minchinhampton.</p>
<p>The definition of affordable housing is unclear and clarification sought.</p>	<p>This is housing which is available to those households who are unable to rent or buy on the open market. In the case of a rural housing exception site, the housing must be retained as affordable in perpetuity. Therefore the properties will either be retained by a registered social landlord and let to households on the housing register, or they will be sold on a shared equity basis, so that when they are then sold again in the future they will again be made available to households on the housing register.</p>