

**Representations to the Stroud Local Plan Review, Draft Plan Consultation
(November 2019).**

On behalf of Cape Homes Limited

Land off Woefeldane Bottom, Minchinhampton.

Introduction

Representations are made with regard to the Stroud District Local Plan Review – Draft Plan 2019 Consultation (Regulation 18, November 2019).

This representation is being submitted on behalf of Cape Homes Limited for Land off Woefeldane Bottom, Minchinhampton ('the submission site').

This representation outlines the site location and expands upon the information contained within the Draft Local Plan and evidence base, demonstrating the submission site is an acceptable location for future residential development. The submission site should therefore be allocated as such within the Local Planning Authority's Development Plan and recognised at this stage of the Local Plan Review for potential allocation.

The Site

The submission site is located within Minchinhampton and is located to the south east of the settlement. In the Local Plan Review the submission site is located to the south of PS05 which has a draft allocation for 80 dwellings, community buildings and open space. This representation is to request that the site should either be included as part of the PS05 site allocation, extending it to cover Land off Woefeldane Bottom, or it could also be a stand-alone allocation for residential development.

The submission site comprises of 2.26 acres, it is linear in shape and is bounded by stone wall and mature hedging to the south. The submission site location plan is shown in Appendix A. A large arable field is located immediately to the east; a campsite bounds the submission site to the north (albeit this is subject to the draft allocation mentioned above); and, the allotments, cricket club and residential properties bound the submission site to the west.

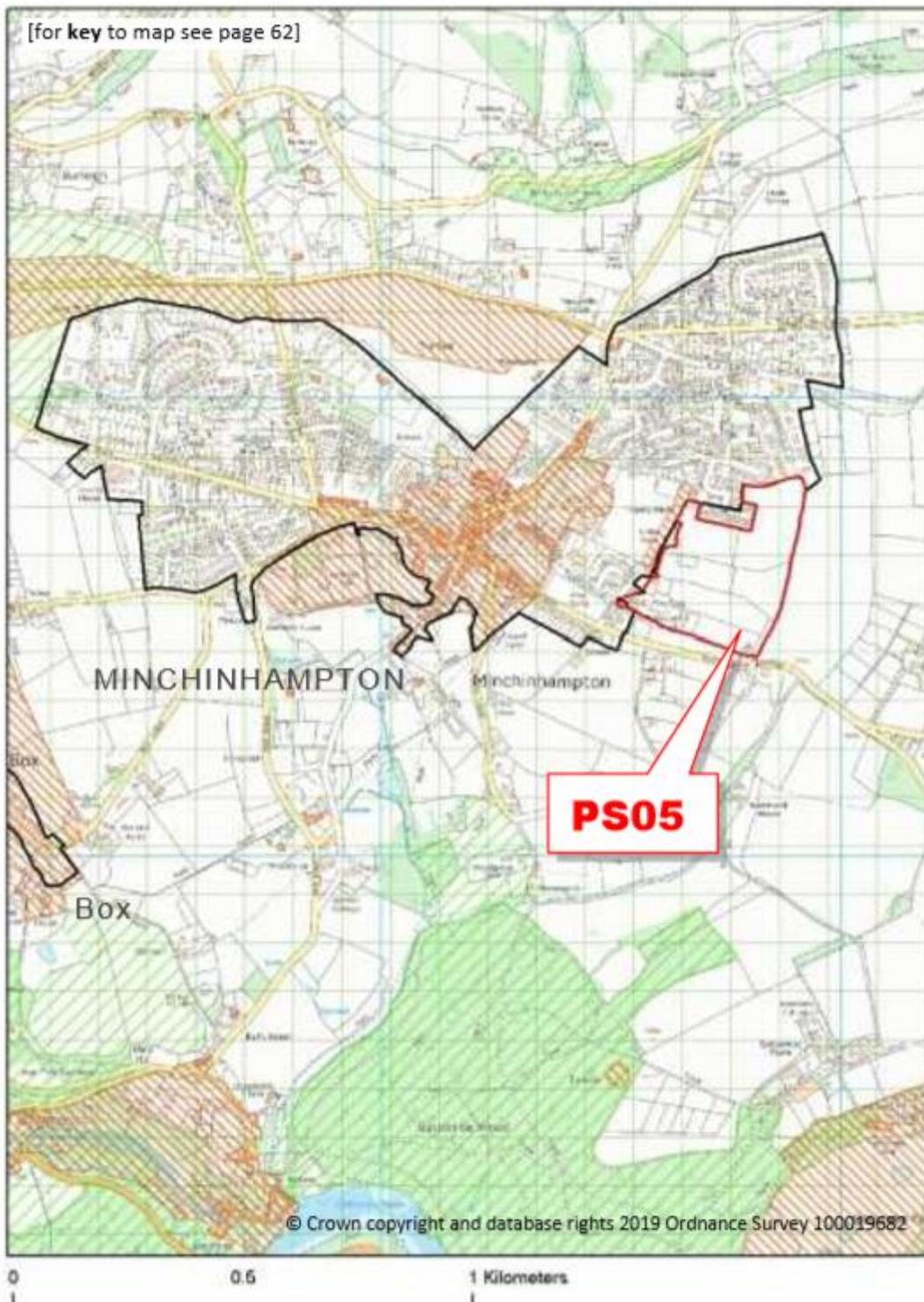


Figure 1: Stroud District Local Plan – Draft Plan 2019

Policy PS05: East of Tobacconist Road, Minchinhampton

Draft site allocation PS05: East of Tobacconist Road, is allocated for a development comprising up to 80 dwellings, community building and associated open space uses and strategic landscaping. We are in support of this allocation.

The Strategy Paper states that Minchinhampton is a Tier 2 settlement and one of the District's local service centres which has a strategic role in providing services or facilities that serve a district-wide or wider than local catchment purpose. There has been a 3% increase in the number of new dwellings between 2015 and 2018.

The Stroud District Settlement Role and Function Study – Update 2018 states that “Minchinhampton and Painswick are amongst the District's most vulnerable large settlements in terms of ageing population and socio-economic trends. Both are highly constrained and both have experienced low rates of growth ... In these places, targeting and tailoring any future development to address these pressures should be a priority when it comes to planning any future growth or development.” Allocation PS05 and Land off Woefeldane Bottom will help to address this need.

Paragraph 72 of the National Planning Policy Framework (NPPF) makes it clear for larger scale residential developments, key facilities such as primary schools and local shops should be located within walking distance of most properties, which this submission site delivers. While the submission site itself would not be a large-scale development it would enable a larger allocation site in this regard to the north with access from Woefeldane Bottom. This would ensure that the sustainability and integration of the PS05 allocation is secured through the provision of an essential access and offer of further housing and investment.

The Stroud District Settlement Role and Function Study Update (2018) highlighted the fact that housing accessibility and housing affordability varies markedly across different parts of the District. Effects on social cohesion and the vitality of communities may be particularly acute in settlements that have seen low levels of housing growth in recent decades, including some communities in the AONB. The study notes a core aim is to “prioritise growth at the District's larger and better-resourced settlements”. Therefore, it has already been recognised that “it should be the case that a higher proportionate growth (above the District average) will be seen at higher tier settlements” such as Minchinhampton.

The submission site is located adjoining the south-eastern edge of the settlement of Minchinhampton and connects well with it. It sits outside, but adjacent to the development limits of Minchinhampton and is within the designated area for the Cotswold AONB. The submission site is not located within a flood zone 2 or 3 and there are no flood zones to its boundaries. There are no listed buildings nor are there any Public Rights of Way crossing the submission site. It is also noted that within the Draft Plan is the preferred direction of housing growth in landscape terms is to the

east. Minchinhampton has a 'district centre' with a range of shops to serve a small catchment of surrounding villages and hamlets.

As part of the site review work the Council commissioned consultants to undertake an Evaluation of Site Landscape and Visual Issues in October 2019. The report sets out that PS05 is *"still considered to be suitable for housing development providing it is designed to reflect and respect the Cotswold vernacular with the associated proposed landscape proposals."*

Land off Woefeldane Bottom is not only suitable for allocation in terms of the evidence to support allocation but the resulting development of the site would have further benefits providing open market housing, affordable housing and housing for the elderly to meet local requirements. The development of Land at Woefeldane Bottom will assist with bringing new public open space forward with potential for new footpath routes to Minchinhampton from the draft allocation. Development of the submission site would also secure contributions to local infrastructure and facilities via CIL.

The submission site was rejected by the Council through the Strategic Assessment of Land Availability (SALA) and there were a number of points made within their reasons for rejection however these reasons conflict with the allocation of PS05. The submission site was rejected due to the submission site being outside and adjacent to the settlement development limits. PS05 is also currently outside and adjacent to the boundary and so would therefore according to the SALA also be rejected. The submission site is within a land parcel assessed in the Council's Landscape Sensitivity Assessment (2016) as having medium sensitivity to housing development which is the same as the proposed allocation. The SALA reasons go on to say that the development of the site would extend urban development into the countryside however PS05 would ultimately extend the urban edge of Minchinhampton and this submission site would be consistent with the new urban edge.

The lack of inclusion of the submission site within the wider allocation to the north makes little to no sense. There is no explanation within the evidence base that explains the lack of allocation of the submission site despite its previous submission to the Council and why when examining the evidence it has the same sensitivities as the proposed allocation. Indeed, the lack of inclusion of the submission site as an allocation site will lead to potentially perverse outcomes for the draft allocation site:

1. Development will turn its back on the submission site, which surely isn't going to be the right approach in landscape/urban design terms.
2. Even if development faces the submission site then it will be facing land over which there is no control.

Allocation of the submission site will rectify these issues.

Housing Delivery

The NPPF at paragraph 59 makes it clear that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land come forward where it is needed...” The Government have a target of 300,000 homes a year and in the latest publication of the housing supply figures for the monitoring year 2018/2019 the country has a shortfall of 60,000 homes.

The introduction of the housing delivery test in paragraph 75 of the NPPF emphasises the need for local planning authorities to monitor the delivery of their housing requirements; to ensure sites are built out and this is key for the Draft Stroud Local Plan to meet its housing requirements.

The council under the published Housing Delivery Test for 2018 have a test result score of 94%. The council were only marginally under the 95% requirement for no further action required however the council have had to prepare an action plan. The council published their Action Plan in August 2019 and provided indicative test results based on latest monitoring information. The indicative test result provided by the council is 103%. This increase is based on the adopted plan housing requirement of 456 dwellings a year. This is to increase to 638 dwellings under the standard methodology which the emerging plan will need to meet therefore the council are not delivering enough housing to meet this new need.

As quoted in the Draft Local Plan “currently, the Government requires the Local Plan Review to provide for at least 638 new homes per year”, through the Standard methodology. This is a 40% increase from the figure in the current Local Plan of 456 homes per year. Although 564 homes were built in the District last year, to meet this target every year over the 20 year plan period, it will require the Local Plan to identify land for at least 8,000 new homes

Councils have to use the standard method to set the minimum housing figure but they can have an alternative method to have a higher housing need figure. The PPG sets out that there may in fact be circumstances where the higher housing figure is more appropriate. Plans that have a higher housing figure than the standard method will be found sound.

Although the Council must be commended on using the most up to date figure available for its Local Plan there is of course a chance this could still change in line with the Government’s aim to significantly boost the supply of housing. It must be highlighted that some of the figures in the Local Plan review Draft Final Plan 2019 to meet the 12,800 targets are questionable. As noted on page 32, paragraph 2.44 “some of the dwellings likely to be built from 2020 have already received permission or are firm “commitments” (i.e. they are awaiting signing of legal agreements)”. However, it goes on to state that “not all permissions are likely to be implemented”. Permissions that have not been legally signed off are also not firm commitments and therefore

further allocations should be made in key centres such as this site, to mitigate these future issues that could arise. The evidence that the Council need to provide to demonstrate that a site is deliverable are set out in the NPPF as ; current planning status, written agreement from the site developer of delivery, firm progress of site assessment work, information on site viability and inclusion within the Housing and Economic Land Availability Assessment can be used to demonstrate deliverability. This submission site has been previously been included within the SALA.

It is capable of delivering homes either as part of the potential allocation to the north, or as a stand-alone site. It is clear from the extracts in Appendix A that it is suitable for development.

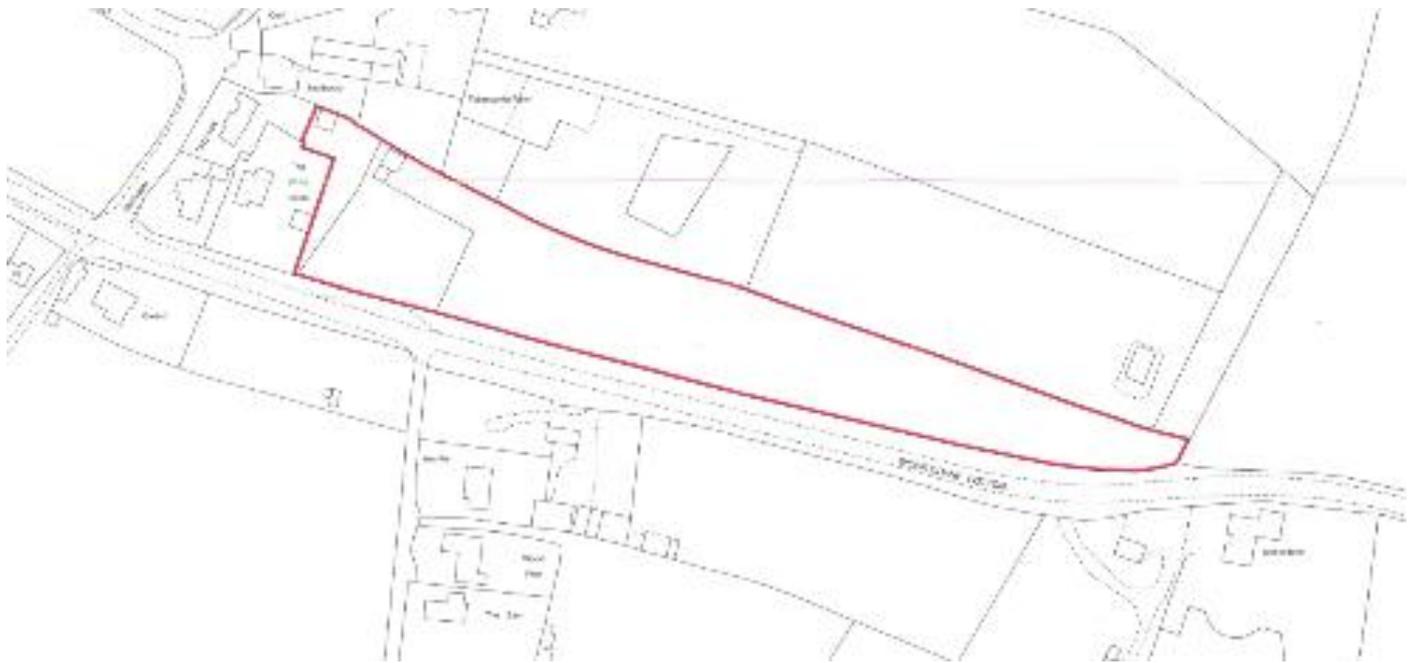
Conclusion

This Representation is for the Stroud District Plan Review, Draft Local Plan Consultation (November 2019 - January 2020) and demonstrates the submission site comprises of land in a sustainable location in close proximity to the settlement and main urban area, its services, public transport routes and current draft allocated sites.

The submission site is available, suitable, and achievable; it is therefore deliverable in accordance with the definition in the National Planning Policy Framework for the future development required within the Stroud District, the Draft Local Plan and the National Standard Housing Methodology 2018.

On this basis, we would urge Stroud District Council to allocate the land for housing either on its own or in combination with PS05 which would also help to provide housing in the local area, customers to the existing services and places to the schools in Minchinhampton. We look forward to your response on these matters in due course as part of the on-going consultation process.

Appendix A – Site Plan



The Site: Woefuldane Bottom