

Minchinhampton Parish Council's response to the Stroud District draft Local Plan

/1/ Minchinhampton Parish is surprised and dismayed to find no consideration of its (or any other) NDP in the draft Local Plan

ES12 makes interesting reading. This Parish has not noted its NDP (adopted by SDC in 2019) being taken into account. Quite the opposite.

Our Parish's NDP forms part of the statutory Development Plan for Stroud District.

All NDPs in force during any part (however short) of the period covered by a Local Plan should be appropriately and completely referenced within it. Any inconsistencies between a new Local Plan and the NDPs in force prior to its adoption should be ironed out during the consultation period with each parish affected such that parish NDPs remain fully consistent with the Local Plan and valid.

The District Council must not allow the situation where its Local Plan and parish NDPs contradict, and should provide resources beyond the precept to enable parishes with an NDP to stay consistent with the Local Plan.

This should not include a presumption that a parish will automatically be required to take changes from the District Council; our own NDP was a four-year-long process of research, consultation, approval by referendum, and so forth. The extension it offers on the 2015 Local Plan are meaningful in our Parish, and must be accounted for properly by the District Council.

/2/ Minchinhampton Parish is pursuing SAC status for its commons and wold edges

Minchinhampton Parish is, as part of its NDP, pursuing Special Area of Conservation (SAC) status (or its successor equivalent) for the Parish's nationally-important grasslands, commons and wold edges.

This will address their inexplicable overlooking when Rodborough Common SAC was constituted, and will complete this protection of the vast wildlife corridor that begins at urban Rodborough and ends at the high wolds, and which integrates the steep and rugged Frome, Nailsworth and Avening valleys.

Minchinhampton Parish's commons habitats (both uplands and edges/slopes) are subject to immense pressure for leisure, and are in no way less important than Rodborough Common (arguably more, especially the edges), and are contiguous with the existing SAC, continuing, extending and enriching the habitats it contains.

It is reductive and artificial to exclude Minchinhampton Parish's commons from the mitigation measures that benefit Rodborough Common. The draft Local Plan highlights (page 44) our commons' utility to, and use by, the eastern part of the entire district.

The next Local Plan must recognise the pressures already faced by all of Minchinhampton Parish's commons, but also the added pressures they will face as PS01, PS02, PS05–07, PS10–13 and other developments come on-line. It must acknowledge their status as Dark Skies destinations, see point /3/.

The Local Plan must require necessary mitigation measures to be in place before any large-scale development is approved within any potential Minchinhampton SAC catchment area.

Noted: Rodborough is not included in the discussion of the Stroud Valleys Cluster (pages 61 to 80). Is it to be considered part of Stroud town? If so, what are the implications for Rodborough Common SAC?

/3/ Minchinhampton Parish intends Dark Skies Destination status for its commons, and recommends dark skies for at least the adjoining upland areas

Stroud District is the 73rd darkest district (of 326) in England according to the CPRE, and Minchinhampton Parish, already one of its darkest parishes, intends to become darker.

Minchinhampton Parish has some of the darkest, least obstructed skies in the District. It intends for its uplands and commons, already a significant day-time recreation and tourism draw, to become a significant night-time one as well, bringing people in to enjoy its dark skies as much for views of distant galaxies as for the excitement caused by its bat, owl and insect populations.

The draft Local Plan should reference, further and protect this aim, which is supported by EI10.

The draft Local Plan should particularly reference the arcs of commons and AONB extending from Amberley to Burleigh (including Culver Hill), and from Hyde to Balls Green (including Burnt Ash, Crackstone, Hampton Fields), which currently provide the Parish's darkest skies.

It should be a consideration made in neighbouring parishes that add to nightglow.

The draft Local Plan should recognise the Dark Skies policy adopted by Minchinhampton Parish in June 2019 (which follows Commission for Dark Skies guidelines). The Parish has referenced it in its responses to planning applications, but has not seen it observed by the District Council.

A Dark Skies policy is observed by the AONB, so it should be a significant consideration and source of policy for the District Council. A Dark Skies policy has significant benefits for human health, biodiversity/wildlife, the built environment and energy consumption.

Commission for Dark Skies guidelines on lighting can easily transfer to the Local Plan. A Dark Skies policy furthers the aims of DCP1, CP4, DHC5, CP14, CP15, ES1, ES3, ES6, ES7, ES12, and DES2. Dark Skies considerations may usefully require CP5, CP8, HC1, HC5, HC6, HC8, DHC6, DHC7, CP11, CP12, CP13, EI4, EI5, EI7, EI8, EI11, EI12, EI16, DES1, and ES10 to be amended.

Minchinhampton Dark Skies is potentially as significant a regeneration initiative as the Thames and Severn Canal, and deserves its own District-level policy statement along the lines of ES11.

/4/ Minchinhampton Parish wants to know how "Minchinhampton will grow..."

(page 62, paraphrased elsewhere) There is often ambiguity between Minchinhampton town and Parish in the draft Local Plan. The Parish covers approx. 23km² with three other defined settlements besides the town, and a number of small villages and hamlets in rural settings. The town accounts for approx. 45% of the Parish population.

Apart from allocating PS05, the draft Local Plan says nothing specific about how and with whose support the town "will grow". The Local Plan should draw on the Parish NDP, discussing the purpose, aims and needs the town has as the large and dominant settlement on the Cotswolds uplands.

The town's strategic role is under-estimated, eg it has more registered patients at its GP surgery than there are people living in the entire Parish. The town has an important and targeted role to play for the district north-east, east, and south-east of Stroud.

/4a/ Balancing Minchinhampton and Nailsworth as commercially-significant, adjacent local centres

Minchinhampton and Nailsworth are adjacent Tier 2 settlements: their commercial cores are approx. 3.4 km apart. Box, a Tier 4 settlement and Minchinhampton Parish's fourth-largest community, sits on Nailsworth's border.

The draft Local Plan states intentions to enhance Nailsworth's commercial centre (summarised page 42). It intends for Nailsworth to have a wider local catchment. That inevitably impacts Minchinhampton Parish.

At the same time, it calls for Minchinhampton to be enhanced as a district centre (eg pages 62, 69).

It follows that strategies for Minchinhampton and Nailsworth require co-ordination, with a strong focus on differentiation and identity, so that both centres can flourish synergistically and serve their communities. Nailsworth mustn't drain Minchinhampton (eg draft Local Plan para 2.65).

Any Local Plan must address this.

/4b/ Minchinhampton Parish is looking for commitments to improve Minchinhampton town's accessibility

Minchinhampton town is a district centre and Tier 2 settlement, but is more than usually constrained when compared to other Tier 2 settlements, eg Berkeley and Wotton-under-Edge, and so relatively inaccessible.

The Local Plan should address this directly with a dedicated transport strategy that will concurrently address vehicle use of the commons, including bolstering public transport, principally bus transport suitable to older people, commuters and young families.

Proposals should also be made (as indicated on page 43) as to how NCR45 might connect, via Minchinhampton town, to the cycle route being considered in the A419 Inspiration Study, and as to the Parish's connectivity with the regenerated Thames and Severn Canal.

A train station or halt in the Frome Valley on the Parish's northern boundary (potentially by and as part of Dockyard Works, ER4) should be considered. (E114)

Schemes to improve access to Cam and Dursley station (page 28) and motorways (page 29) simply make the Parish's problems worse, with the presumption of the out-commuting and old, private transport technology that is contrary to our Parish NDP.

/5/ Minchinhampton Parish opposes PS05: East of Tobacconist Road as it is proposed

Minchinhampton Parish considers PS05 to be far too big and exceptionally poorly-conceived.

The case for PS05 has not been made. It is contrary to NPPF para 84. It does not comply with the Parish NDP. It in no way addresses para 2.26. It does not comply with CP8. The necessary ecological, archaeological and highways studies have not been done. It is vital that any development proposal in the Parish, given all its constraints, be robustly justified from the start in order to deter further speculative proposals.

There is no need for any big site

There is no need to allocate a specific large site for housing in Minchinhampton Parish: the Parish has demonstrated the ability to meet its housing stock growth targets through small developments and infill. PS05 is

clearly an attempt to discharge the entire Parish's CP2 allocation on one site, thereby acknowledging its much greater than usual constraints on new build.

The PS05 site is much too big

PS05 is essentially the entirety of land parcel M06, which can potentially hold well over 200 houses. PS05 specifies 80. The reasonable expectation is that PS05 would, in short time, become saturated with added piecemeal development to M06's actual capacity for new housing, an outcome that would grossly increase the problems discussed here and introduce a set of completely new ones.

There is no indication where and how housing will be located/concentrated on PS05.

Development beyond PS05

PS05 would move Minchinhampton's SDL an unnecessary and significant distance into the AONB, and ease the case for further development along Woefulane Bottom, towards and beyond Hampton Fields. This will necessarily lead to infrastructure changes that massively impact not just east Minchinhampton because the town with its bottlenecks will force (road) development either onto the Avening Valley or Crackstone.

The effect of a massive spike in vehicle traffic around east Minchinhampton

PS05's location is unsustainable without substantial new transport infrastructure off-site: road-building, PRoW and public transport. PS05 is unsuitable to this, with all options affecting the local natural and built landscapes, and the communities within them to an unacceptable degree.

Minchinhampton town is already choked. Traffic leaving/entering PS05 will likely be steered either east (via unsuitable Tobacconist Road) towards Hampton Fields and Crackstone, which already face problems caused by rat-run traffic from Cotswold district, or north through the Glebe estate. Either way, traffic will therefore increase on Cirencester Road (which is already over-pressured), heading towards Aston Down or unsuitable routes through Brimscombe, Butterow, Rodborough, Box, and Culver and Bear Hills into Woodchester.

Access to the site is impractical for this number of houses, suggesting it will justify road links to and loss of Woefulane Bottom.

It is hard to see point 3 of CP13 being met.

The lack of accompanying infrastructure

No matching employment is planned for PS05 (para 2.59). Minchinhampton has no meaningful public transport (E112). Without commensurate other development, PS05 is unsustainable and acts to destroy the character of the town.

PS05 would remove a section of AONB

PS05 is contrary to NPFF para 172 and the Glover Report.

It is in the AONB, outside the SDL, in a greenfield site with potentially significant archaeological and farming value. The Parish's commons are nationally-important in terms of ecological, geological and cultural heritage, and not just generic countryside. They should not be so cheaply lost.

The site has to be considered in its broad context as an integrated part of a network of protected landscapes (eg SSSIs, SAC, ecological corridors), farming and recreational uses that would all experience unjustified detriment from this scale of concentrated development.

/5a/ Minchinhampton Parish places minimum requirements on PS05 going ahead

A generic 80-home addition to Minchinhampton town within the boundaries specified for PS05 is a poorly-conceived proposal that is deaf to local housing needs, the local landscape, and local planning history. It is not consistent with para 2.26.

The Parish NDP describes a shortfall in affordable housing and an over-supply of larger homes.

The town has an aging population. This is also true of the wider Parish.

Woefulane Bottom to the immediate south of PS05 has already been turned down at appeal for many of the reasons that will be taken into consideration when PS05 comes to detailed proposal (S.19/015/APPREF).

What Minchinhampton town needs is housing suitable for older couples and singletons to move into, perhaps sheltered housing or care home places (so creating local jobs), consistent with DCP2. This would free up existing, often larger and requiring retro-fit properties, possibly for redevelopment into new, sustainable housing units, possibly introducing two or three homes into sites previously containing one inappropriately-large dwelling. (Thereby addressing the targets leading to PS05's proposal.)

It also needs a moderate supply of explicitly-affordable homes.

These measures would be consistent with CP7 and CP9.

If PS05 is to be retained in the draft Local Plan

The proposed site is much too large. It should be restricted to PS05's north-west third. It should match local housing needs, and be protected from developers' decisions as to where best profits lie.

It should require the establishment of significant new wildlife corridors and enhanced PRow along its south-east boundary, and protect and enhance existing corridors. The Parish Council expects significant tree-planting, thus establishing the sharp boundary with adjacent open countryside that is considered characteristic of the Parish's settlements and described in its NDP.

It should otherwise be fully compliant with the Minchinhampton Parish NDP.

Access should be through the Glebe estate, which itself should see accompanying infrastructure development, at least including meaningful inclusion on bus routes to desired locations at appropriate times.

/6/ Secondary issues relating closely to Minchinhampton Parish

/6a/ Minchinhampton Parish needs better information than that provided by Appendix B: Suitable land for wind and solar

The maps in Appendix B are entirely inadequate to allow informed comment on their content.

They should be drawn with regard to existing restrictions acting upon the installation of such power-plants, eg the AONB, SSSIs, and with regard to specific local features. In Minchinhampton Parish this would include eg airspace restrictions around Aston Down airfield and protected bat populations at Iron Mills.

Maps should also indicate how sites would integrate with the power-grid and/or designated communities (and the infrastructure investment implications thereof).

Appendix B should in actuality be a chapter of the draft Local Plan identifying specific sites in the same way that the plan identifies residential and employment sites.

/6b/ Minchinhampton Parish considers it necessary to specify strategic tree-planting sites and tree-planting policy

ES8 is woefully inadequate commentary on tree-planting in the District. It is widely acknowledged that huge numbers of trees will be planted in the near future. It is entirely likely that tree-planting will frequently be mismanaged and unsustainable, with the wrong species being planted in the wrong places, ignorant of the green infrastructure network the draft Local Plan discusses.

Strategic tree-planting sites need to be identified now to make sure that when trees are planted they are valued by and valuable to nearby communities. Policies need to be written to promote tree-planting along both new and existing streets, in squares and in gardens. There should be a vision of the plant (and associated animal) communities and corridors strategic tree-planting could create/strengthen/rescue.

There should be a chapter of the plan devoted to this.

/6c/ Minchinhampton Parish considers it a priority to identify a sustainable travel network for the District

Following on from point /4b/, there should be policy support in the Local Plan for the designation (in response to present need and in anticipation of future development) of clearly-identified, well-specified/maintained and sensible walking/cycling routes from all defined settlements, major employers and schools in the District to all other settlements etc. within, say, 4km.

/6d/ Minchinhampton Parish is concerned that employment space will be lost at ER4 Dockyard Works

Minchinhampton Parish notes that brownfield land is being lost to housing rather than being regenerated to provide in-District employment opportunities. This exacerbates a number of the District's problems.

In the 2015 Local Plan, SA1f Wimberley Mills ('Wimberley Park') was intended for a mix of housing and employment uses. Those employment uses have not materialised.

Adjoining ER4 Dockyard Works is in the draft Local Plan. Given its location, the non-materialisation of jobs at Wimberley Mills, and the likelihood of out-commuting by Wimberley Mills residents, it is a priority to ensure a near-future supply of high-quality employment spaces and varied opportunities at ER4.

If part of ER4 is used for housing (which E12 permits), it should make the best use of its location and existing connectivity and provide affordable starter housing suitable to people capable of travelling to work sustainably (via bus, cycle, foot) or live-work units as per DHC3.

/6e/ Minchinhampton Parish is seeking redesign of the A419 Aston Down roundabout

Redesign of the Aston Down roundabout (A419 & Cirencester Road) is a priority identified in the Parish NDP that needs mention in the Local Plan. The roundabout presently acts to direct unsustainable volumes and types of traffic across the Parish's commons and along its problematic road network, in contradiction of the Parish NDP and the Local Plan's intentions.

/6f/ Preferred development locations in Amberley and adjoining villages

Amberley (page 63) is a multi-centred community, so development proposals should be actively steered towards a preferred zone that enhances integration of the village with Theescombe, St Chloe, and Littleworth.

/6g/ Error in the wording of Core Policy CP9: Affordable housing

Amberley is listed as a rural Parish. It is in fact part of Minchinhampton Parish. SDC needs to be clear whether CP9 extends to all of Minchinhampton Parish.

/7/ General observations on the draft Local Plan

Housing and employment sites are poorly-matched in scale and location.

Priority 23 (page 17). This is a key issue in our Parish. There is nothing in the draft Local Plan that offers a lead on this.

Priority 32 (page 17). How? What green spaces are liable to be adopted into this wish? Would eg our Parish's commons be included?

Priority 35 (page 19). One of many instances where an aim is not tied to a metric. The draft Local Plan generally makes well-intentioned aims that cannot be argued against, but does nothing to suggest how progress towards those aims should be tracked. The same observation can be made of enforcement. It is predictable that unless specific standards are used that developers will race to the bottom of any obligation (ES1 especially).

Vision to 2040 (page 22). If tourism is a key industry, what are the resources that will help protect eg our Dark Skies (point /3/), SSSIs and built heritage from poorly-managed visitor number increases?

(page 32). If more care home places are needed, why are care home sites not being identified strategically (and existing homes being closed)?

(page 34). There is nothing in the local draft Local Plan that encourages young people to stay in our Parish. The loss of skateboarding and indoor football from nearby Brimscombe Port, the loss of employment spaces, the neglect of play areas works against this.

(page 35). This set of aims is much too ambiguous (what is cramming, how are local needs identified?) and does nothing to indicate how eg "additional affordable homes working with parish councils, co operatives, community land trusts and community housing groups" will be achieved given that such enterprises are often inexperienced and under-resourced.

Stroud "integrated transport hub" (page 42). It must connect adequately with user-led routes/timetables to nearby settlements such as those in our Parish.

(page 51 and others). "at least 30% affordable housing on all sites capable of providing 4 or more dwellings" – does this not encourage cramming?

CP8. While some issues, such as transport, are appropriately considered at the Cluster level, Minchinhampton Parish's greater size and more constrained and rural nature indicate that housing should not, and should instead be considered at the Parish level. The Parish does have its own Housing Needs Assessment. Enhancing biodiversity is always appropriate.

HC5 does not make sense. A building can be replaced only if it is a heritage asset? And the reasons why a dwelling has been abandoned should be taken into account before writing it off.

HC6 to HC8. Include cycle storage, charging points, wildlife roosting, nesting, feeding, foraging and hibernation opportunities. Extra loading onto local highways to be taken into account.

CP9 should ensure that housing which could be classed as affordable at the Local Plan's start date remains so until its end, and is not redeveloped, extended or otherwise altered to take it out of the affordable category.

DHC6. "Development proposals shall not involve the whole or partial loss of open space within settlements..." Or indeed compromise their use, quality or ecological value. DHC6 should additionally provide support to

parishes and community groups that wish to take such spaces out of private ownership and secure them as an ongoing community benefit.

DHC7. How is the population figure arrived at for a development? Youth spaces should be larger than children's spaces. Should there be allocations for burials and pedestrianised spaces? "For strategic allocations, where the achievement of these standards is unrealistic or inappropriate within the boundaries of the development site, a financial contribution will be sought in lieu of on-site provision." The presumption should be that it is always realistic and appropriate, and it should be up to the developer to prove otherwise.

CP11, point 6. "Industrial symbiosis" is one of a number of inadequately-explained terms in the draft Local Plan. The draft should be reviewed for plain English.

CP13. Proposals need to examine how they contribute to peak loading on transport networks, which itself leads to the construction of capacity that goes unused (but still requiring maintenance) for most of the day.

EI2. "Site rationalisation should provide at least the same employment opportunities for the local community as existed when the employment space was previously used" is poor phrasing providing for too much wrangling. A developer could argue that no opportunities had previously been provided for 'the local community'.

EI12 must not be used as an excuse to avoid creating new public transport infrastructure.

DEI1. Where are delivery vehicles in this? On tight and overloaded roads such as those in our Parish it would make sense to introduce a 'shared destination strategy' (ie community depots) to match the shared mobility strategy. (Indeed, where is the widespread encouragement for community-owned communal assets?)

CP13, EI12 and DEI1 do not address the needs of horse-riders or mobility-aid users.

EI16. A contribution to (responsibility for) maintenance would encourage developers to install more robust shelters and seating.

CP14, point 12. Is this not a clause enabling developers on eg mix-use sites (such as, often, the PS and ER sites) to ignore CP14?

ES8 should include drystone walls and key road verges.

ES11. Essentially this is a loop meaning that developers pay s106 to ensure they can sell their developments for more. These contributions could be used in much more impactful (for the wider community) ways.

DES2. There should be something to benchmark and characterise the interaction of people with the various aspects of green infrastructure.

(page 194, 7.12 & 7.13) These reports should include assessments of change in: local, sustainable transport networks; energy generation; food production; and ecological improvement.