

19 July 2021

The Stroud Local Plan Inspector
c/o Strategy Team
Stroud District Council

Objection: Minchinhampton: Site Allocation PS05 / PS05A

Basis of Objection

1. I write to object to the proposed Allocation PS05 in Minchinhampton in the Pre-submission Draft Stroud Local Plan in its present form. In my view allocation PS05 is;
 - unimplementable,
 - prejudicial to good planning, and
 - risks rendering the Local Plan unsound.

Further, it cannot be ascertained that in relation to allocation PS05 the Plan has been Positively Prepared; the allocation is based on a passive call for sites that cannot be described as positive planning.

Minchinhampton Neighbourhood Development Plan

2. The Pre-submission Draft SDCLP makes no mention, in the context of PS05/05A, of the thorough consideration by the people of Minchinhampton, including widespread and well-documented consultation, that underpinned the Minchinhampton Neighbourhood Development Plan, which was adopted by MPC and SDC, and became part of the statutory Development Plan on 18 July 2019.
3. Nor does the SDC PSD Local Plan reflect the Policies in the NDP for development, traffic, town centre, and other matters. The NDP policies recognise that future health of Minchinhampton may require some further development; but it also set out considered criteria to be satisfied and the policies to allow this to happen.
4. The NDP noted that any future growth other than infill would be likely to be eastwards, notwithstanding the AONB (the whole of Minchinhampton is, in any event, within the AONB); because the environmental constraints to the south and north, and especially west, were of considerably greater significance.
5. Local Sites Allocation PS05 at Tobacconist Farm recognises the eastward trend of development potential, but it does not comply with any of the specific principles or policies in the Minchinhampton NDP.

6. NDP Policy Dev 1 sets out that future development that makes a positive contribution to resolving the social and environmental aims of the NDP will be supported. No such support could be given to PS05, which would exacerbate rather than solve the current problems.
7. The NDP noted that Minchinhampton needs alternative traffic circulation routes to reduce conflict and congestion in the town centre and allow for more access to shops and services. It proposed a Feasibility Study to:
 - identify amendments to access and land uses in the centre of Minchinhampton, particularly around the school, library, and doctors' surgery (Policy MP Dev 2), and;
 - the means of funding these changes, which may involve District, Parish and County Council Departments as well as funding from developers.

As yet, the Parish Council has not pursued the Feasibility Study, although there is an NDP Implementation Group established to do so. Such a study requires facilitating by an experienced local/town centre planner with a track record of enabling agreement between parties.

Implications of Site PS05

8. In addition, the NDP proposes investigation of a range of traffic routing and management measures to improve vehicle movement and reduce conflict with pedestrians. Improvements to the Market Square and town centre are suggested, possibly including a Shared Space, for which the shape of Minchinhampton centre is ideally suited, if through traffic can be reduced. Policies MP Traffic 1 and Traffic 2 set requirements for new development, and are part of the statutory Development Plan. PS05 cannot comply with these policies.
9. PS05 will severely prejudice the suggested enhancement process, and is inimical to sound planning in that:
 - On the one hand it is too small to enable contributions to town centre management, whilst on the other it is large enough to cause considerable problems,
 - Its access route through the Glebe estate is wholly inappropriate, unsound, tortuous, narrow and dangerous,
 - It will merely deliver further traffic to the already difficult junction at Blue Boys, and to the congested town centre.
 - It conflicts with the wider aims of the Minchinhampton NDP to create a peaceful, walkable, shared space in the Market Square.

Linkage of PS05 / PS05A

10. The Local Plan PS05 explanatory text states that SDC will require a Masterplan to be prepared for PS05, presumably by developers, to be approved by SDC. However, the Plan also states that Site PS05A, to the south of PS05, is to be safeguarded for future expansion.
11. The allocation of PS05 relies on a tortuous and counter-intuitive northern access to the Cirencester Rd, with only pedestrian and cycle access to the south. It is inconceivable that development of PS05A could also use such a northern exit.

Positive 'good' planning, as opposed to passive responses to individual developers' opportunistic proposals, clearly requires that these two sites be considered in a coordinated way. Indeed, the safeguarding of PS05A in the PSD Local Plan is itself a clear admission that this is the correct approach. If PS05 is found sound by the Inspector, any Masterplan should be required cover both sites, as well as the land connections north and south. Together a proper plan is possible; separately a chaotic result is inevitable.

Policies PS05 / 05A: Plan Review

12. It would be more satisfactory if PS05 / 05A were withdrawn to allow studies to be carried out prior to the next Local Plan Review. To reduce traffic in the town centre, whilst accommodating organic growth and securing a better framework for traffic and land use around Minchinhampton, it would seem to be necessary in due course to provide an eastern link between Tetbury Road and Cirencester Rd. Should these allocations be approved in due course, a process for their gradual implementation at a rate compatible with past development rates should be agreed between the District and Parish Councils, developers and local groups working in consort, to ensure that the community benefits of such growth are realised.
13. A Masterplan for the eastern boundary of Minchinhampton as a whole would clearly require consultation with landowners including probably the National Trust who own a small parcel of land (a driveway, unmanaged at present) at Old Common.

Good Planning

14. As Planning Authority Stroud District Council should fulfil its duty to 'secure the wise use of land', and undertake or sponsor these investigations to see if there is an acceptable means of managing the gradual growth of Minchinhampton without serious intrusion in to the AONB, and providing benefits to the town. Such a proper planned solution might require compulsion to acquire access, in which case SDC would of course have to justify this against alternatives, including examining whether there is a justification for the growth proposed in the plan.

Conclusion

16. In sum:
 - a) Allocation PS05 is not justified by evidence, nor effective in delivering sustainable development; because it does not have a practicable access.
 - b) Allocation PS05 is not compliant with the Development Plan because it fails to address the policies in the Minchinhampton NDP
 - c) PS05 and PS05A should be planned together. They should be withdrawn from the Plan until a Masterplan for the east of the town is prepared by the District Council and others prior to the next Plan Review.