

**Re: Minchinhampton Neighbourhood Development Plan (NDP) – Comments under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (As Amended) and the Localism Act 2011**

To fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the Council has commented on the emerging Minchinhampton NDP on a number of occasions.

We are committed to helping the qualifying body deliver a successful plan. In order to achieve that, we take this opportunity to offer constructive comments on issues that we consider have not yet been addressed in a satisfactory manner.

To communicate our response in a simple and positive manner; we produced a table containing an identification number for each comment, a copy of the relevant section/policy of the NDP, our comments and, where possible, a recommendation.

Our comments at this stage are merely a constructive contribution to the process and should not be interpreted as the Council's formal view about whether the draft plan meets the basic conditions.

Yours Faithfully



Director of Development Services

Stroud District Council

**TABLE 1**

Section	NDP Section or Policy	Comment	Recommendation
	<b>General</b>	Page numbers are not displayed until p38	Format to include missing page numbers
	<b>General</b>	The Local Plan is in the process of being reviewed to cover the period to 2040 and policies and proposals intended to be cross referenced in the NDP may be amended.	Consider removing references to specific Local Plan policies and proposals to ensure that the NDP when made does not become out of date when the Local Plan Review is completed in 2021/22.
<b>1.2, 2.1</b>	<b>Introduction / What the NDP aims to achieve</b>	The first sentence of this paragraph could be construed as being a criticism of the Local Plan, and gives the impression that the people of Minchinhampton were not consulted in the preparation of the local plan. Similarly, para. 2.1 implies that the Local Plan does not contain local guidance nor reflect the wishes of local communities.	Remove the first sentence of para. 1.2, and after the second sentence include the following: “The NDP will refine the policies in the Stroud Local Plan to provide a new layer of local relevance to the development plan”. Delete the first sentence of para. 2.1.
<b>1.4</b>	<b>Introduction</b>	The first sentence should be amended for clarity.	Amend the first sentence as follows: “Planning applications should be decided in accordance with the development plan unless material considerations indicate otherwise.”
<b>1.4, 1.11, 2.1</b>	<b>Introduction</b>	Whilst Stroud District Council is the local planning authority, other decision makers (e.g. Planning Inspectorate, Secretary of State) will also need to have regard to the NDP when taking decisions.	Amend wording to refer to decision makers (i.e. not just the District Council).
<b>2.10, 2.14</b>	<b>Background – Data on Growth of Housing in the Parish/Future Growth</b>	Under the new NPPF SDC is required to identify a housing requirement figure for designated neighbourhood areas.	Consider identifying the requirement figure for Minchinhampton Parish in your NDP. SDC officers will help to identify this figure.
	<b>Policy MP Env 3 Nature Conservation, bullet point 1</b>	Whilst assistance with evidence gathering is always welcome, the first bullet point does not add anything to the policy in terms of managing development.	Remove from the policy, and perhaps include in the supporting text.
	<b>Policy MP Env 3 Nature Conservation, bullet points 4 and</b>	These requirements will not apply to all developments, and will be dependent on the site location and baseline	Add “Were necessary and appropriate” to the start of both bullet points.

	<b>5</b>	ecological conditions.	
	<b>Policy MP Env 4 Minchinhampton Common, bullet point 4</b>	This point reads more like an aspiration rather than a policy	Amend to read “ The Parish Council will support measures to mitigate the effects of recreation on the local ecology of Minchinhampton Common”
<b>4.1</b>	<b>Development, housing and sustainable growth</b>	The reference to the NDP potentially modifying the location and type of development is not helpful.	Suggest this phrase is deleted unless it is clarified in terms of what the NPPF says about the relationship between Local Plans and NDPs.
<b>4.3</b>	<b>Supporting Sustainability</b>	Sustainability is a wider concept than simply reducing out-commuting or encouraging walking.	Amend first sentence to read “Measures that support sustainability include those which would reduce out-commuting....”
<b>4.4</b>	<b>Supporting Sustainability</b>	The final sentence either requires clarification /justification or deletion.	Delete final sentence.
<b>4.7 and 4.8</b>	<b>The Crown Inn</b>	Both of these paragraphs go into unnecessary detail on the ownership of the Crown Inn. They are also contradictory in their reference to the pubs ownership and highlight how changes of this nature can quickly make information in the NDP out of date. The reference to “Asset of Community Interest” should read “Asset of Community Value”.	Revise both paragraphs into 1 single paragraph that gives a brief introduction to the pub and its role as an Asset of Community Value. Avoid references to specific owners.
<b>4.10 and 4.11</b>	<b>Schools and educational provision</b>	Are school places in demand only from people moving in to the area, or from people outside of the area choosing these schools (e.g. see para. 4.12), or from increased birth rates from households already within the area? The picture is complex but these paragraphs imply only one cause.  The final sentence implies that the NDP authors have not discussed this with GCC. It would be preferable for the sentence to confirm the position after having had those conversations.	Either confirm the evidence for this viewpoint or amend the paragraphs to refer to a combination of pressures.
<b>4.18</b>	<b>Minchinhampton Doctors Surgery</b>	The position of the NDP on the surgery should be more transparent. Policy MP Dev 2 appears to be suggesting that the best approach would be to redevelop the existing site and immediate area to enhance community	Reword the paragraph to make a clearer link between the objective and Policy MP Dev 2. Alternatively, consider wording to commit the Parish Council to working with SDC to identify the best site

		provision. If this is correct, this paragraph should be reworded to make clear that this is the objective.	through the Local Plan Review.
<b>4.35 and 4.36</b>	<b>Sources of Funding</b>	The statement in the first sentence of para. 4.36 is disputed. Paragraph 4.55 provides a more balanced explanation. Contributions are either required by development or not under planning policy to mitigate the impacts of development. The lack of any large schemes which would trigger S106 contributions is the main reason why resources have not been collected in the past. Relying on small windfall developments has not generated the resources to deliver major community projects. However, having an NDP in the future will assist through the collection of CIL monies.	Suggest para. 4.35, 4.36 and 4.37 are reworded to look forward rather than back – to make the simple point that development can secure funding for infrastructure and community projects, either directly through on-site facilities and the provision of land or indirectly through contributions from S106 and CIL.
<b>4.63 – 4.65</b>	<b>Growth and funding of community facilities</b>	Under planning law, you cannot require developments to solve existing problems. However, the NDP can seek to resolve existing problems through positive planning and through the use of CIL monies raised from development.	Reword to avoid the impression that development will be required to solve existing problems.
<b>4.67</b>	<b>Growth and funding of community facilities</b>	The minimum level of growth required for Minchinhampton in the future will be set within the Local Plan. This will not be subject to negotiation. However, there is scope for this NDP, and for individual projects in practice, to go above this level. That will be driven by evidence and negotiation where appropriate.	Reword to reflect comments.
<b>4.69 - 4.71</b>	<b>How much development is likely to take place</b>	See comment under 4.67. Some of the information in these paragraphs is now out of date or factually inaccurate.	Reword in line with previous comments e.g. General and paragraphs 2.10,2.14
<b>4.74- 4.76</b>	<b>Policies for Growth and Development</b>	See comments under 2.10-2.14 and 4.67.	
<b>4.79- 4.84</b>	<b>Housing Needs Survey</b>	Housing needs survey are specifically designed to identify the need for new affordable homes. However, settlements will also have people within them who have a future need for market housing. It is important for this	Amend the paragraphs to make clear that the survey identified the quantum of need for affordable housing not the overall quantum of housing needs within Minchinhampton.

		section to clarify that this survey does not address the quantum of future need for market housing from people currently living within Minchinhampton.	
<b>4.88</b>	<b>Providing affordable housing</b>	The evidence appears to suggest a current need for affordable housing of at least 24 households although the survey only had a 30% response rate. It is therefore unclear the justification for saying 5 a year is an appropriate and sustainable rate for new affordable dwellings in the parish. The policy refers to a minimum of 5 a year.	Provide justification for identifying a supply of affordable housing of 5 a year or delete the sentence.
<b>4.89 and 4.95</b>		There appears to be a conflict between the “uniformity of style” in para. 4.89 and the “mixture of styles” in para. 4.95.	Amend wording to clarify the nature of the local character.
	<b>Policy MP Dev 1 New Development</b>	The final bullet point seems to be 2 separate points in one. It should be split so that the provision of broadband is a separate bullet point	Remove “provide....businesses” from the final bullet point and place in a separate bullet point.
	<b>Policy MP Dev 2 Minchinhampton Town Centre</b>	This is not currently worded as a planning policy or proposal but as a statement of intent by the Parish Council. Suggest rewording to create a planning policy.	Reword to read: “Land within Minchinhampton town centre currently occupied by the library and surgery will be redeveloped to enhance the current level of community provision and to improve access to the school. Development proposals for the area incorporating traffic management and parking provision and links to the Market Square and Bell Lane access to the park will be required to conform to a masterplan to be the subject of local consultation.”
<b>P43</b>	<b>Policy MP Emp1 Business and Employment</b>	Remove “the Parish Council particularly encourages” in first sentence and replace with “Proposals will be supported for”.  Please clarify the nature of changes to business use	See comment.

		classes envisaged under this policy.	
<b>P43</b>	<b>Policy MP Emp 2 Working from Home</b>	Formatting issue with paragraph 1	See comment
<b>P51</b>	<b>Policy MP Traffic 2</b>	It is difficult to envisage how developments away from settlement centres and schools could comply with this policy. Suggest reword to make a positive policy.	Reword policy to read “Development proposals will be supported which contribute to the improvement of traffic movement and circulation within the Parish, especially around the centres of the communities and around the schools.
	<b>Policy MP Transport 2</b>	Suggest minor amendment as not all development is large enough to provide routes.	Amend to read “Development proposals should provide access to safe and convenient walking and cycling routes to local services and facilities.”
<b>P51</b>	<b>Policy MP Parking 1</b>	Remove the word “encouraged” and replace with “supported”	
<b>P51</b>	<b>Policy MP Parking 1</b>	The second part of the final sentence diverts from the main focus of the policy, which is car parking. It is not clear how cycle racks and electric car charging points contribute to this from the way it is presented. If cycle racks are seen to be a way to alleviate car parking problems through encouragement of cycling, perhaps this would be better presented in a separate policy. There is no previous mention of electric car charging points in the supporting text. If this is an aspiration arising from the evidence base, this should be noted in the supporting text, and presented as a standalone policy.	Remove the second part of the last sentence from the word “including”. Consider expressing support for cycle racks and electric car charging points in 2 separate policies.
<b>P51</b>	<b>Policy MP Parking 2</b>	Parking standards are set out in Policy E112 and Appendix 2 of the Stroud Local Plan. The requirements of this policy would therefore only be relevant should a developer propose a parking provision which differs from the standards set out in the Local Plan.	Add “,should the proposed parking provision differ from that set out in the Stroud Local Plan” to the end of the policy.
<b>7.20 and P57-59</b>	<b>Phased implementation of the Vision</b>	It is assumed that the identified promoters set out in the phasing table have agreed to deliver these projects.	Confirm that the promoters have agreed to deliver these projects.

