

Stroud District Council Local Plan Examination

Matter 6 Site allocations

This statement is provided by Hornbeam Planning on behalf of Archstone who have been promoting the site at land east of Tobacconist Road (PS05).

Matter 6a Site allocations - General questions

4. *Site allocations that include housing development specify dwelling capacity figures.*

b. Is the scale of housing for each site allocation justified having regard to any constraints and the provision of necessary additional infrastructure?

The promotion of site PS05 through the Local Plan has had the benefit of the technical evidence that was prepared for a full planning application submitted in 2015 (the application was later withdrawn). The submissions to the call for sites and subsequently, including the technical summaries submitted with the Pre-Submission Local Plan representations, have referred to and built upon this evidence base.

The Concept Plan submitted with the Pre-Submission representations reflects the in depth understanding of the relevant constraints including landscape, heritage and ecology.

Please refer to the supporting Environmental Appraisal, Additional Landscape and Additional Heritage Notes submitted with the Pre-Submission Local Plan representations.

c. Do the site allocations achieve appropriate densities and make effective use of land, in accordance with the Framework?

The Concept Plan provided with Pre-Submission representations for Site PS05, illustrates a low-density scheme suitable for the edge of settlement location within the AONB, with a net developable area of 2.65 ha which could comfortably accommodate up to 80 dwellings. Approximately half of the site is shown as undeveloped to allow for landscape, amenity, drainage, heritage and ecological mitigation, and public open space (the site is 5.27 ha in total).

5. *The site allocation policies refer to the production of masterplans and/or development briefs but no further details are set out.*

b. Is it appropriate for every site allocation to require a masterplan and/or development brief, particularly the smaller sites? Is this justified and proportionate to the scale of development?

Archstone have already produced a Concept Plan for Site PS05. We would be happy to work with the Council to agree a masterplan as part of the pre-application process, although a policy requirement for a separate masterplan/development brief stage is unusual for a site of this relatively small size. Due to the size and nature of the site there are only limited options for how the site will be planned/developed.

c. Is the process by which the masterplans and development briefs would be approved by the Council, clearly defined in the Plan? How long would this process take? Are they to be approved before decisions on planning applications are made? If so, what impact, if any, would this have on site delivery timescales?

We would appreciate clarification in this regard. We would be concerned if the process went beyond officer approval and involved formal consultation and Council approval, which seems unnecessary and would likely lead to delay. The usual pre-application stage (which will also include public consultation) and planning application process, should provide sufficient opportunity to develop and agree a masterplan and appropriate form of development.

Matter 6b Stroud Valley site allocations

Local Sites Allocation Policy PS05 East of Tobacconist Road

6. *The site is allocated for up to 80 dwellings and associated community and open space uses and strategic landscaping.*

a. As regards the site's location within the AONB our queries are as follows:

i. Has its allocation within the AONB been robustly justified?

The Parish of Minchinhampton is almost entirely within the AONB, with only very limited areas associated with the industrial valleys excluded. Minchinhampton town is entirely within the AONB. Minchinhampton is a large settlement with a population of 3,462 and 1,437 households. It is recognised to be a sustainable community with a strong local retail role and a very good level of local services and facilities (SDC Settlement and Role and Function Update 2018. EB72).

There is an acknowledged acute lack of affordability and high need for affordable housing in the Parish.

Minchinhampton Parish Council produced a Neighbourhood Plan which was made in July 2019. The Neighbourhood Plan indicated a need at that time of at least 24 affordable homes. It is unclear why the Neighbourhood Plan did not seek to allocate

a site or sites to address that need. Instead, it planned to identify sites in 3-6 years' time and refers to the possibility of the Local Plan allocating sites. The Neighbourhood Plan has not delivered in addressing the need for more affordable homes for the community.

There was discussion about the need for affordable housing in Minchinhampton at the recent appeal for land at The Knapp (APP/C1625/W/22/3300819). In the appeal decision dated 24th October 2022, the inspector concludes that there is a "high" need of between 8-12 dwellings a year.

In representations to The Knapp planning application and appeal, the Parish Council comment on providing for affordable housing as follows:

"However, the emerging strategy document, while it may not have the planning weight afforded to the adopted plan, remains in our view a material consideration. It is critical in so far as it proposes another site – at Glebe Farm – to meet Minchinhampton's share of housing requirement...

Particularly, the emerging plan proposed a site for 70 [sic] dwellings on land to the east of Minchinhampton, which, while controversial, is arguably less intrusive to AONB considerations and sustainably closer to the centre of town. That site if adopted will support the identified affordable housing need at 30% of construction, a Local Plan policy."

In their representations to the Pre-Submission Local Plan, the Parish Council say that historically windfall developments have on average provided an additional 8 dwellings a year. However, as they point out, the typical nature of these sites (small and brownfield, including in the industrial valleys) has not usually yielded affordable homes.

Therefore, there is no prospect of significantly addressing the acute lack of affordability and high need for affordable housing, without a substantial allocation in the Local Plan at Minchinhampton within the AONB.

The potential of the Site PS05 to accommodate growth for the town has long been recognised. It was identified at the preferred site following a Planning for Real exercise undertaken by the Parish Council in 2010.

Given the context of the AONB, the assessment of potential sites in Minchinhampton has been strongly influenced by the landscape. The Cotswold AONB Board has agreed in recent representations that Site PS05 is the least sensitive location to accommodate the necessary growth of the settlement.

The site is well related to the existing settlement and is sustainable in terms of its proximity to local services and facilities. The Concept Plan provided with our representations show how the site can be sensitively developed, allowing for the constraints and providing for up to 80 dwellings of which 30% would be affordable.

The allocation of the site is therefore fully justified.

- c. *The policy seeks to incorporate the existing Public Right of Way within the landscaped open space. How much open space is sought and what other types and levels of community and open space uses and strategic landscaping would be required, or are these covered by other Plan policies? Are these justified?*

The Concept Plan provided with Pre-Submission Local Plan representations illustrates how the existing Public Right of Way could be accommodated within a wide, attractive area of public open space and landscape buffer, with only a minor diversion to its existing route across the site. If it was decided to be preferable, the low-density scheme could incorporate the existing route of the footpath.

- d. *The evidence in EB39 Appendix A includes statements that, in regard to this site, there are 'Very significant heritage constraints' and that this is 'a highly sensitive site which directly adjoins The Bulwarks designated Scheduled Ancient Monument (SAM)'. The policy only states that heritage assets need to be 'conserved and enhanced' and provides limited further detail.*
- i. *What assessments have been carried out of the impact of the proposed development of the site on the significance of relevant heritage assets? How has this informed the decision to allocate the site and what are the development requirements?*

Representations from Historic England to the Pre-Submission Local Plan refer to the SALA Heritage Impact Appraisal (2017) (EB50), which states that the site is highly sensitive. Such statements in relation to heritage are to some extent out of date. The Appraisal refers to the entire SALA site which includes the proposed safeguarded site and takes no account of the available mitigation through setting development back from the boundary near to the Scheduled Monument (as illustrated by the Concept Plan).

The Additional Heritage Note by EDP provided with our representations to the Pre-Submission Local Plan provides detailed commentary on the heritage context of the proposed reduced allocation. The includes consultation with the Historic England and a response to the comments from the AONB Board on heritage. EDP conclude the site can be developed with no impact to the significance of the scheduled monument.

- h. *Some of the representations raise concerns about other issues affecting the site including site access, traffic, loss of grazing land and accessibility to local services and public transport. Have these and any other relevant factors been suitably assessed as part of the process to allocate this site?*

Following the consultation on the Draft Local Plan (November 2019), the proposed allocation was reduced to the northern parcel, with vehicular access shown from Farm Close.

This revision to the draft allocation generally accorded with the comments from the Parish Council on the Draft Plan, when they suggested:

“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.”

Prior to revising the Concept Plan for the site, Archstone’s highway engineer undertook an inspection of the Glebe estate and Farm Close and concluded that it could provide an appropriate access for the proposed allocation.

A cohesive allocation (as opposed to small windfall sites) has the benefit of providing for off-site highway mitigation as required, which could include some of the improvements to the town centre proposed in the Neighbourhood Plan.

The site is sustainably located in relation to the existing settlement. The Concept Plan includes a footpath/cycleway to the south to Tobacconist Road which would provide a route past the nearby community Hub building and of circa 0.5km to the High Street.

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