



## Consultation response form PART B:

If you have several different comments to make, you may wish to use a separate PART B sheet for each one (although you do not have to). If you use multiple PART B sheets, please make sure you fill in your name on each of them (you only have to fill out PART A once, as long as it is clearly attached to your PART B sheets when you submit the forms to us).

Your name

Your organisation or company

CALA Homes (Midlands) Ltd

Your client's name/organisation  
(if applicable)

The consultation is seeking views about whether the big issues identified within this paper are the right things to focus on and what options exist for tackling them. Are there other issues, options or opportunities that have been missed? **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (download a copy of the sites form at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)).**

**We ask a series of questions (highlighted in pink boxes) throughout the consultation paper. Each of the questions is numbered. Please can you reference the question number(s) and/or the topic here:**

Question number: 3.5a / 3.5b and Minchinhampton Locations / Potential Sites

Please use this box to set out your comments:

*(Attach additional sheets of paper or expand this box if you need to)*

Question 3.5a

Option 1 and Option 2 would provide the most flexible way of delivering plan-led housing sites, to help meet the local and national requirements for housing. Sites should be considered in the planning balance, against the landscape issues of the sites themselves, heritage impacts, sustainability and other criteria. Sites should also be assessed against other sites in the settlements, to deliver the housing required, establishing which sites best fit into the settlement patterns and minimising harm to heritage assets.

Question 3.5b

In the adopted Local Plan, Minchinhampton is classified as a Local Service Centre – the Second Tier of the settlement hierarchy. As such Minchinhampton is a highly sustainable location for future housing growth in Stroud, although sensitive in terms on heritage and landscape. It is proposed that SHLAA site MIN002 offers an opportunity to provide growth for the village, without impact on heritage assets and suitable landscape mitigation.

Sites in Minchinhampton

The two sites in Minchinhampton identified as broad locations for future growth ('South of Cirenceseter Road' - MIN A / MIN004 and 'East of Tobacconist Road' MIN B / MIN005) are not suitable for future housing development in Minchinhampton.

MIN 004 (MIN B in issues and options document)



This site is located on the eastern village edge, off Cirencester Road. Any development on the site would be a significant expansion of the village into the open countryside to the east. The settlement boundary on the eastern side of Minchinhampton is well defined, and development of this site would be incongruous with the existing settlement pattern. The site could not be considered as 'rounding off' the settlement and would be a highly visible encroachment into the countryside.

The site is also given a development potential of 50 houses in the 2017 SHLAA, which would constitute major development in the AONB. Which is contrary to the NPPF:

Para 115 of the NPPF states: "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads."

Para 116 of the NPPF states: "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."

Therefore unless the site can meet the three tests above it should not be considered for allocation.

#### MIN 005 (MIN A in issues and options document)

This site is located in the eastern / south eastern side of the village off Tobacconist Road. The principal reason this site is not deliverable is due to the sensitivity of the nearby Scheduled Ancient Monument (SAM) "The Bulwarks". Historic England describe the SAM as: "The Bulwarks: an Iron Age bank and ditch: The linear bank is 10m to 12m wide and c.1.5m high at its highest point. A ditch 10m wide and c.1.2m deep runs parallel to the bank on its eastern side. A partial excavation in 1937 by Mrs Clifford demonstrated that the bank had a stone revetment on the side facing the ditch. Pottery from beneath the bank and in the primary fill of the ditch suggest a Late Iron Age date for its construction."

As the above quote shows delivery of the site if approved would likely be slowed by the existence of archaeological remains. Furthermore, it is probable that development could cause substantial harm, to a heritage asset which would conflict with Paragraph 132 of the NPPF.

NPPF para 132 states that "Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional." Therefore, development of this site should not be considered as less than substantial harm or wholly exceptional.

Furthermore, as a large site, the development would likely constitute major development in the AONB, which as per para. 115 and 116 of the NPPF stated above, should not be considered for allocation unless it complies with the tests of 116.

#### MIN 002

This site is located to the north of the existing settlement. The site has been subject to a withdrawn application some years ago by CALA Homes. Through the application it was established that due to the AONB location minor development would be suitable in this location. As such, any development would be 24 units or below to be considered as minor development. Furthermore, through the application process a highways solution was agreed, which would be incorporated in any future development of the site. CALA Homes have an agreement with the landowner, and are ready to deliver the site immediately.

Previous SHLAA assessments have excluded MIN002 due to "likely high landscape impact". This is because the SHLAA methodology considers this impact because the site is within a high landscape sensitivity area and would "adversely affect the setting and character of Minchinhampton Common". However, the actual landscape



impact of the site would be mitigated by suitable landscaping along the western edge of the site. Furthermore, the site is not actually visible from the common, and the view from the wold edge has already been impinged by the existing developments on Cirencester Road. This site, if developed would provide a softer boundary to the settlement than the existing recent development.

The site is also in a sustainable location within walking distance to many local amenities, and would not represent obvious development in the open countryside. There are no heritage assets nearby which the development would adversely impact. Given the historically important nature of Minchinhampton and the surrounding area, few sites could provide housing without a heritage impact.

Therefore, the MIN002 site should be considered for allocation in the Local Plan review, as the impact on heritage is negligible, landscape impact can be mitigated, a highways solution is pre-agreed, at a scale in keeping with the AONB and the site is immediately deliverable and achievable.