

# Minchinhampton Parish Council's response to the Stroud District Local Plan Review.

9<sup>th</sup> July 2021

## Executive Summary.

The Parish Council, having consulted its residents and considered appropriate NDP policies, remains of the view that the proposed development at Glebe Farm (PS05) is inappropriate, primarily due to issues around the protection of the AONB. This arbitrary proposal cannot be delivered in an economic, effective, and efficient way without significant disruption and adverse impact to many households. Collateral benefit from any development through CIL payments, or negotiated community provision, is to be welcomed, BUT it cannot be at any price. On balance the conclusion we have reached is that the negative implications of this proposal far outweigh potential positive advantages. We therefore oppose any Local Plan that includes PS05 and PS05a Land East of Tobacconist Road within its proposals.

The Local Plan Review therefore fails in respect of this Parish on its own terms with respect to:

Soundness:	Collateral damage to the areas adjoining the site because of unacceptable disturbance
Duty to Consult	The Minchinhampton Parish NDP has been ignored
Legal	The Parish NDP has been adopted by SDC. As supplementary planning advice.

## Broad Background Detail.

Minchinhampton has an adopted Neighbourhood Development Plan, (September 2019) with SDC and it follows that as supplementary planning advice, the Parish can expect its findings to be incorporated and considered into any proposal. The NDP discusses the possibility of additional development without identifying any sites. That omission was deliberate, not an oversight. Any growth should be organic, pragmatic, and not forced.

It can be demonstrated that Parish growth has been achieved through windfall and small sites development/ redevelopment. Historically, at least up to 2015 (the current adopted local plan) and continuing through to 2020 windfall has delivered up to 8 additional dwellings per. annum. Most of this has been through "brownfield" schemes, but redevelopment of areas such as the Tynings and Old Common has also contributed to the totals (26 demolished, 46 constructed). Over the plan period proposed, to 2040, that would equate, if that rate continued, to a further 8x19 dwellings, or 152 accommodations. There is no reason to think that might not be achieved, and an overnight growth point of up to 80 units will distort andacerbate absorption problems.

Within the Parish currently there remains the Wimberley Mill development to bring to completion. That is a brownfield site of course but is still scheduled to deliver some 100+ properties. Arguably these will migrate economic activity towards Brimscombe, but children will still need schooling and illnesses treated; school and surgery capacity will be a critical consideration.

The small exceptions sites policies proposed in the Plan will assist finding sites in all the communities in the parish, including Brimscombe, Amberley and Box. That of course is all dependent on suitable sites being identified, and any development of sites that come forward will have to be affordable to meet NDP constraints. The NDP has rightly identified that part of the housing market as where the need is greatest. Already 2 small sites of 7 dwellings each is being built out, one on what was once garages, and the other a demolished

bungalow. Both are within the development boundary of the Town. Thus, practical realism demonstrates that what is written here can be taken as sensible probability.

Brownfield sites yet to be realised within the parish are available, particularly at Dark Mills in the north, adjoining Wimberley Mills.

These are where development should be promoted before any protected greenfield land is allocated, as demanded by the NPPF.

The Parish Council regrets that those recent approvals, notably at Butt Street and Wimberley Mills, have been approved WITHOUT any expectation of affordable housing provision.

**Inexplicably, the site at Dark Mills, which had planning now lapsed for some 55 accommodations (sheltered housing) appears to have been completely overlooked in the Plan review. Why?**

The inclusion of PS05a as a reserve site highlights the likelihood that any development will be used as a lever to force further, or more intensive, development. The reduction in numbers from the 2019 expectation of 100 dwelling to 80 dwellings is a tokenism, easily reversed by aggressive development. The site area is capable of more than the projected number anyway, to perhaps as many as 150 units, by omission of generous public open space provision.

Against the definition of settlements set out by SDC the reality of the situation and the essential retail limitation in the this community point the way clearly to a Tier 3 designation for the settlement. MPC has consistently argued this case. Given the hierarchy was originally assessed in 2012, re-evaluated in 2019, during which period at least four more retail businesses have closed with no replacement, the situation has deteriorated further. (Perhaps 40+% of our total)

The Plan, however, proposes the Minchinhampton should remain as a Tier 2 settlement, which we believe is incorrect against definition. This is exacerbated by poor outward connectivity. The bus service is slight, and infrequent. Outlier parts of the parish such as Box and Amberley see Nailsworth as their natural core providers. As currently categorised, Minchinhampton and Nailsworth are adjacent Tier 2 settlements: their commercial centres are approx. 3.4 km apart. Box, a Tier 4 settlement and Minchinhampton Parish's fourth-largest community, sits on Nailsworth's border.

We remain resigned to a contracting retail opportunity, but need to be practically pragmatic to its implication. The Local Plan proposals fail to recognise that.

The draft Local Plan states an intention to enhance Nailsworth's commercial centre. It intends for Nailsworth to have a wider local catchment. That inevitably impacts on Minchinhampton, and is contradictory to reality

At the same time, it calls for Minchinhampton to be enhanced as a district centre, demonstrably impractical.

The SDC Local Plan defined strategies for Minchinhampton, and Nailsworth demonstrates a lack of understanding of connectivity, with a strong focus on differentiation and identity. The two things are mutually conflicting and therefore both are not possible, in our view.

The situation will be worsened further when the Brimscombe Port development proceeds to completion. SDCs aim is clearly to promote community focus as part of that scheme. It sits exactly on our northern border and will drag economic and social activity from the residential areas of our Brimscombe ward.

As a fundamental base case the Local Plan must address this. Whilst education and health provision may be considered as currently adequate, parking and infrastructure are not, and Broadband remains largely an

aspiration. To put Minchinhampton in the same category as places like Nailsworth and Berkeley appears a fundamental misjudgement, and error. Sustainable growth is more problematic in a Tier 3 settlement which is where we believe we sit..

### **Special Status of Minchinhampton's Landscapes.**

Minchinhampton Parish sits totally within the Cotswolds AONB, and it is therefore of critical importance regarding any development, as NPPF para 172 applies. (Protected landscapes) The District Council has recognised this to some degree in its Plan, majoring development sites into the Severn Vale; indeed, SDC's own observations (page 26/ 2.19) notes that and development should be specifically focussed on needs arising from the AONB itself. This does not mean open market-driven development with inappropriate housing, which in some cases can do further damage to protected landscapes. Further, there is no proven need for agricultural or rural business-related housing.

The AONB is not limited to the Commons which surround the residential communities. It remains a significant constraint to land generally in the Parish. This appears to be overlooked in the SDC LP submission.

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 'escarpment edges.

This will address their inexplicable overlooking when Rodborough Common SAC was so constituted and will complete the protection of the significant wildlife corridor. The National Trust has launched an initiative to create wildlife corridors to link it's Woodchester Park estate, across the Commons, and into the ecologically important habitats in the Frome valley. Stretching this eastward brings in Avening and Chalford as well and proposing a significant interruption in the east will clearly be very unhelpful. The good work being proposed will not be undone but will be compromised.

Minchinhampton Parish's Commons habitats (both uplands and edges/slopes) are subject to immense pressure for leisure and, in our view, are in no way less important than Rodborough Common. (Arguably more so, especially the edges), It would thus be contiguous with the existing SAC, supplementing, 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 our commons' utility to, and use by, the eastern part of the entire district. Those pressures are discussed below.

### **Dark Skies.**

The Commons are of course free from artificial light sources to some large degree. There is spillage from the valleys and town itself (Amberley and Box are largely free of street lighting.) A minor victory has been achieved at Wimberley Mills, where the GCC have agreed in principle to adopt new streets without lighting columns, The GCC have started reducing lighting intensity generally through the county, and the Parish Council has spent the last three years designing a scheme for the main conservation area that further reduces intensity. All of this and more can contribute to the areas over the common being used positively for night-time sky appreciation. This is included in the NDP as an aspiration.

The draft Local Plan should reference, further and protect this aim. Any new development should be conditioned to specifically exclude external floodlighting after say 11.00pm., and limit fenestration in proposals. Ideally, we would like this extended to neighbouring parishes as well. Very little of this has seen any support in planning permissions granted in the last 7 years. Why?

A Dark Skies policy is included by the AONB Management Board in its policies, so it should be a significant consideration and included by District Council objectives. The AONB accounts for about 50% of the District. A

Dark Skies policy has proven benefits for human health, biodiversity/wildlife, the built environment, and energy consumption reduction.

The Commission for Dark Skies guidelines on lighting can easily transfer to the Local Plan.

### **The Value of the Commons.**

The Commons are a vital component in the quality of life in the whole of the eastern part of the District, not just the Parish itself. Apart from their historical importance for ancient grazing rights, and the quality of the grassland that derives from unimproved agricultural use, with attendant ecological richness, they must double up for leisure activity. This creates enormous pressure, which as a community we try to manage and mitigate.

Audits of vehicle activity in the car parks show visitors come from all over; this is not just about the Parish, but the whole district and beyond (e.g., Bristol, Birmingham etc.) A trip to the Commons is seen as a day out. We recognise that pressure, and the Commons (not just Minchinhampton which has 7 separately designated areas but Rodborough and Selsey too) is a massive contributor to mental and physical well-being. That pressure however needs to be controlled. Increase in dog walking through covid has only worsened the problem. It is in our view **nationally important** that development pressures here are contained. Any proposed development that increases that pressure – litter, dog messing, erosion, and the like – can only be detrimental to wider community benefit.

Commons grazing rights are protected in the Commons Registration Act of 1965. This is a fixed acreage, and no further expansions to that right have been allowed since the legal door was bolted. (in spite of a review a few years ago.) The fields comprising PS05 and PS05a are registered. Once lost to development, the pool of farmers and their registered land is lost to grazing activity, meaning fewer animals can theoretically be released to manage the grass. For this reason alone, potential for development is unwarranted and should be resisted.

Other agencies are also involved in this protection. The Cotswolds Natural Landscape CNL (formerly the CCB Cotswolds Conservation Board), CPRE. The National Trust as primary landowner are all opposed to further pressure from development in areas within easy access of the Commons, and will have made their own submissions to the review.

Surveys are currently taking place to identify and quantify traffic pressure across the Commons. Vehicle numbers and speeds are at capacity with respect to free grazing animals. Any plan must reflect SDC-supported reduction if possible.

The unfortunate provision of the roundabout at Aston Down has had an unfortunate effect on traffic volumes across the Commons. Signage there and road alignments encourage cross Common routing.. We believe it's installation should be reversed to the previous layout. ( A T-junction) Whilst it may have been granted automatic planning consent as a county highway initiative, (triggered by commercial pressure at Aston Down airfield) it's subsequent consequences need to be fed back into it's detail design. Highways CIL moneys should be allocated to that end. The speed reduction measures in Cirencester Road do not properly address this and are deemed inadequate and poorly designed and conceived by users. They have been modified by tinkering, but a back-to-basics approach will be more effective.

Of course, we are privileged to live here, and that is reflected in house prices. But this is not NIMBY. This is about keeping the Commons protected for posterity, for all.

### **For the above reasons, MPC MUST resist inappropriate development**

Minchinhampton Parish considers PS05 to be far too big and poorly proposed, and has value as back-up winter grazing unrecognised by the Local Plan proposals.

The case for PS05 has not been made. It is contrary to NPPF para 84, especially with its access difficulties through the Glebe estate where parking on both sides of narrow roads limits heavy goods access. Children use the streets for play (skateboards) in addition to accessing designated play areas. The proposed theoretical access goes right past one, along a road that may not even have been fully adopted. These difficulties would become “Life and Death” issues when needing access for emergency vehicles such as Ambulance, Police, and the Fire Service.

The proposed development would throw another minimum 160 vehicles through the estate. Four movements per household daily equates to another 600+ pd. journeys. Nothing has been even considered as far as off-roading the parked vehicles in the Glebe is concerned. Who would fund that, and where would the cars go, without hugely detrimental concreting over of front gardens? This has not been thought through.

Furthermore, it does not comply with the Parish NDP. The necessary ecological, archaeological and highways studies have not been done. PS05 adjoins a scheduled ancient monument. It is vital that any development proposal in the Parish, given all its constraints, be robustly justified from the start to deter further speculative proposals. None of that has been done.

In that regard the reserve site PS05a is inappropriate as well as it sends the wrong message to developer expectation. Without PS05 it is irrelevant.

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. (See above). Not evaluating the Dark Mills site for parish growth is frankly a gross disregard for brownfield before greenfield allocations. What is needed is subsidised land for social housing and that can only be met through exceptions sites policies. Driving such development with market housing is a gross mistake, and a cynical response to developer pressure, rather than public need

It is also clear that the development of the town itself is restricted to the north and west (protected landscapes) and south (geological constraints) and can theoretically only therefore go east. However, access difficulties render that equally impossible, without serious intrusion into open countryside. We are seriously concerned that access has not been adequately considered in this submitted plan review, regardless of landowner’s willingness to release acreage.

The town itself is restricted to single track access from the proposed development site, and is generally constrained by a 17<sup>th</sup>/18<sup>th</sup> century expectation of design around the needs of a horse and cart. The additional pressure on the Commons, and the inadequate highway network of the Parish, is not welcomed. The Glebe estate through which access is proposed was built in the 50s and 60s, with recent increases. As already identified, it has narrow roads, and little off-street parking and is constrained by usage. It is in short totally inadequate to accommodate heavy construction traffic and then a disproportionate amount of residential traffic compared with the remainder of the estate

These assumptions by SDC appear to be the result of desktop / google map studies with no interpretation of practical, safe, and considered wellbeing for residents and their families across the demographic age range. There is no indication that the Planners who have prepared this Local Plan have spoken to the housing department of the same council, who will be most affected by the damage caused.

## **Transport.**

The NDP has looked at this and proposed speed and parking reviews across the Parish. That is “work in progress”. No further development should be entertained until that work is complete, and its conclusions implemented. There is considerable public expense to be found in delivering that.

In addition, local bus services have been progressively reduced through GCC cuts. Anyone living here needs decent transport out, as the Town itself cannot deliver everything needed for convenient existence. More development is paradoxically not the answer to increasing facilities provision. Historically the Town did support more localism, but the ring of supermarkets allowed by the District Council has killed off most of it. 80 additional homes will offer only marginal benefit to the viability of what remains, and impact on school pressure..

While we recognise that public transport is not a District Council responsibility the Local plan has to take account of provision. For example, ANY new dwellings must have adequate parking and access to main roads without extended walking. Rural areas, and we are no exception, rely on the car however fuelled for transport.

A sustainable transport policy here is increasingly irrelevant.

### **Mitigation.**

If the proposal at Glebe Farm (PS05) remains after the review, including representation to the Inspector at EiP., then the Parish Council would ask that the following is recognised and incorporated:

The establishment of significant wildlife corridors and enhanced PRoW Tree planting is a parish priority. This can over time soften landscape impact, and aid mental health and wellbeing.

Any development must be fully compliant with the Minchinhampton Parish NDP.

The Council is actively seeking additional allotment land.

The Council is looking to enhance recreational opportunity.

The Council is mindful of wider NDP expectations, which will require significant investment to deliver.

End.

NCH June 21 ( Revised 14 July 21.)

### **Glossary**

NPPF National Planning Policy Framework

SDC Stroud District Council

MPC Minchinhampton Parish Council.

NDP Minchinhampton Neighbourhood Development Plan.

EiP Examination in Public. A key requirement of the planning process.

PRoW Public Rights of Way

AONB Cotswolds Area of Outstanding Natural Beauty.