

Representations to the Stroud Pre-Submission Draft Local Plan Regulation 19 Consultation (May 2021).

On behalf of Cape Homes Limited

Land off Woefeldane Bottom, Minchinhampton.

Introduction

This site has been submitted as a representation put forward at Woefeldane Bottom, Minchinhampton through the Regulation 19 consultation. It outlines the site location and demonstrates the site is an acceptable location for future residential development. The site should therefore be allocated as such within the Local Planning Authority's Development Plan and recognised at this stage of the Local Plan Review for potential allocation.

This representation supports the allocation of PS05 and its inclusion within the plan however this representation proposes the southern boundary of the site is extended to include the parcel of land off Woefeldane Bottom.

The Site

The site is located within Minchinhampton and is located to the south east of the settlement. In the Local Plan Review the site is located below as PS05 which has been allocated for 80 dwellings, community buildings and open space. This representation is to request that the site should either be included as part of the PS05 site allocation, extending it to cover Land at Woefeldane Bottom, or it could also be a stand-alone allocation for residential development.

The site comprises of 2.26 acres, it is linear in shape and is bounded by stone wall and mature hedging to the south. The site location plan is shown in Appendix A. A large arable field is located immediately to the east; a campsite bounds the site to the north; and, the allotments, cricket club and residential properties bound the site to the west.

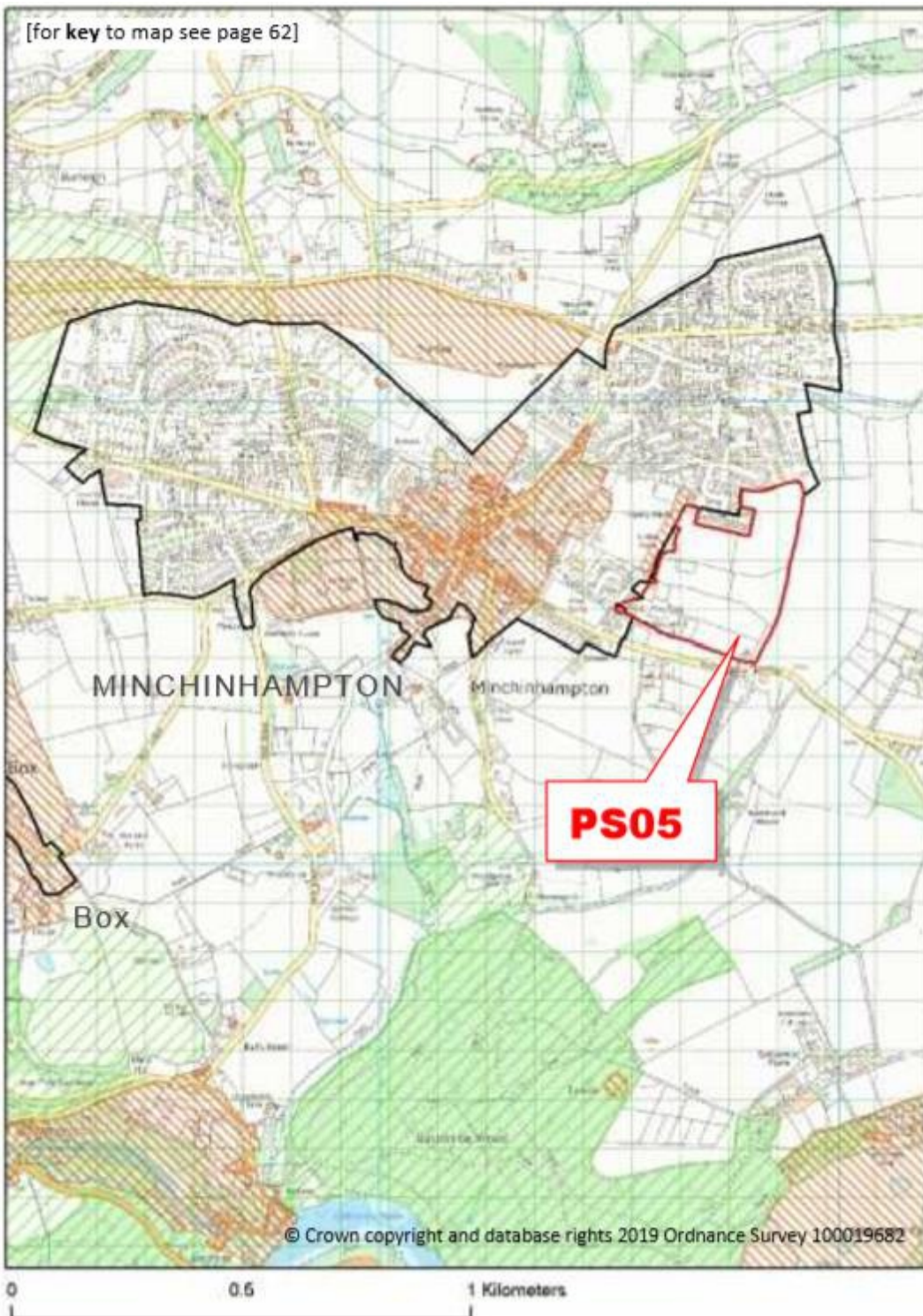


Figure 1: Stroud District Local Plan – Draft Plan 2019

Policy PS05: East of Tobacconist Road, Minchinhampton


Local Sites Allocations PS05: East of Tobacconist Road, is allocated for a development comprising up to 80 dwellings, community building and associated open space uses and strategic landscaping. We are in support of this allocation at PS05 and consider that the allocation should include PS05a and the land to south.

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PS05 allocation...

Local Sites Allocation Policy PS05
East of Tobacconist Road

Land east of Tobacconist Road, as identified on the policies map, is allocated for a development comprising up to 80 dwellings and associated community and open space uses and strategic landscaping. Affordable housing will be for those with a local connection to address local housing needs within the AONB. Particular issues to address include minimising landscape impacts within the Cotswolds AONB, conserving and enhancing heritage assets and local biodiversity, delivering high quality locally distinctive design, incorporating the existing Public Right of Way within landscaped open space and delivering a sustainable drainage solution. A masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.



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The Strategy Paper states that Minchinhampton is a Tier 2 settlement and one of the district's local service centres which has a strategic role in providing services or facilities that serve a district-wide or wider than local catchment purpose. There has been a 3% increase in the number of new dwellings between 2015 and 2018.

The Stroud District Settlement Role and Function Study – Update 2018 states that “Minchinhampton and Painswick are amongst the district's most vulnerable large settlements in terms of ageing population and socio-economic trends. Both are highly constrained, and both have experienced low rates of growth ... In these places, targeting and tailoring any future development to address these pressures should be a priority when it comes to planning any future growth or development.” Allocation PS05 and Land at Woefuldane Bottom will help to address this need.

Paragraph 72 of the National Planning Policy Framework (NPPF) makes it clear for larger scale residential developments, key facilities such as primary schools and local shops should be located within walking distance of most properties, which this site delivers. While this site itself would not be a large-scale development it would enable a larger allocation site in this regard to the north with access from Woefulane Bottom. This would ensure that the sustainability and integration of the PS05 allocation is secured through the provision of an essential access and offer of further housing and investment.

The Stroud District Settlement Role and Function Study Update (2018) highlighted the fact that housing accessibility and housing affordability varies markedly across different parts of the district. Effects on social cohesion and the vitality of communities may be particularly acute in settlements that have seen low levels of housing growth in recent decades, including some communities in the AONB. The study notes a core aim is to "prioritise growth at the district's larger and better-resourced settlements". Therefore, it has already been recognised that "it should be the case that a higher proportionate growth (above the district average) will be seen at higher tier settlements" such as Minchinhampton.

The site is located adjoining the south-eastern edge of the settlement of Minchinhampton and connects well with it. It sits outside, but adjacent to the development limits of Minchinhampton and is within the designated area for the Cotswold AONB. The site is not located within a flood zone 2 or 3 and there are no flood zones to its boundaries. There are no listed buildings nor are there any Public Rights of Way crossing the site. It was noted that within the Draft Plan the preferred direction of housing growth in landscape terms is to the east. Minchinhampton has a 'district centre' with a range of shops to serve a small catchment of surrounding villages and hamlets.

As part of the site review work the Council commissioned consultants to undertake an Evaluation of Site Landscape and Visual Issues in October 2019. The report sets out that PS05 is "*still considered to be suitable for housing development providing it is designed to reflect and respect the Cotswold vernacular with the associated proposed landscape proposals.*"

The Pre-Submission Draft Plan has now established that there will be Safeguarded Land PS05a which will be safeguarded for potential allocation in the next Local Plan Review therefore it would make sense that the allocation would include our client's land.

Land at Woefulane Bottom is not only suitable for allocation in terms of the evidence to support allocation, but the resulting development of the site would have further benefits providing open market housing, affordable housing, and housing for the elderly to meet local requirements. The development of Land at Woefulane Bottom

will assist with bringing new public open space forward with potential for new footpath routes to Minchinhampton from the draft allocation. Development of the site would also secure contributions to local infrastructure and facilities via CIL.

Housing Delivery

The NPPF at paragraph 59 makes it clear that “to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land come forward where it is needed...” The Government have a target of 300,000 homes a year and in the latest publication of the housing supply figures for the monitoring year 2019/2020 the country has a shortfall of 56,230 homes.

The introduction of the housing delivery test in paragraph 75 of the NPPF emphasises the need for local planning authorities to monitor the delivery of their housing requirements; to ensure sites are built out and this is key for the Stroud Local Plan to meet its housing requirements.

The Council under the published Housing Delivery Test for 2020 have a test result score of 130%. The Council in 2018 were under the 95% requirement for no further action required as a result the council prepared an action plan. The Council published their Action Plan in August 2019 and provided indicative test results based on latest monitoring information. Since then, the council have passed the annual requirement each year. This increase is based on the adopted plan housing requirement of 456 dwellings a year. This is to increase to 630 dwellings under the standard methodology which the emerging plan will need to meet therefore the Council are not delivering enough housing to meet this new need. Although 662 homes were built in the district last year, to meet this target every year over the 20-year plan period, it will require the Local Plan to identify land for at least 12,800 new homes.

Councils must use the standard method to set the minimum housing figure, but they can have an alternative method to have a higher housing need figure. The PPG sets out that there may in fact be circumstances where the higher housing figure is more appropriate. Local plans that have a higher housing figure than the standard method will be found sound. The council have undertaken along with the other Gloucestershire authorities a Local Housing Needs Assessment and they have arrived at a local housing requirement which is in line with the standard method.

It can deliver homes either as part of the potential allocation to the north, or as a stand-alone site. It is clear from the extracts at Appendix A that it is more than deep enough to provide suitably size.

Conclusion

This Representation is for the Stroud District Plan Review, Pre-Submission Draft Local Plan Consultation (May 2021) and demonstrates the site comprises of land in a sustainable location near the settlement and main urban area, its services, public transport routes and current draft allocated sites.

The site is available, suitable, and achievable; it is therefore deliverable in accordance with the definition in the National Planning Policy Framework for the future development required within the Stroud District, the Pre-Submission Draft Local Plan, and the National Standard Housing Methodology 2018.

On this basis, we would urge Stroud District Council to amend the plan to allocate the land for housing either on its own or in combination with PS05 which would also help to provide housing in the local area, customers to the existing services and places to the schools in Minchinhampton.

Appendix A – Site Plan



The Site: Woefeldane Bottom