

Stroud Local Plan Review: Matters, Questions and Issues Arising: Matter 2 Point 15.b

Additional Statement Ref Minchinhampton's designation as Tier 2

In their Matters Arising, Planning Inspectors have raised the question of Minchinhampton's designation as Tier 2 following the Regulation 20 Representations phase of the SDC Local Plan review exercise:

"It has been suggested by representors that some settlements (including Minchinhampton) should be re-categorised within the hierarchy. Does the settlement hierarchy accurately reflect the role and function of different settlements within the District and are the settlement categorisations justified by robust and up-to-date evidence?"

While Regulation 20 Representations focused mainly on the allocation of PS05 and PS05a as sites for development, the designation of Minchinhampton as a Tier 2 settlement was touched upon only briefly by the Local Plan Response Group. As Tier designation for Minchinhampton has been identified as a MIQ by the Inspectors, the Local Plan Response Group wish to provide an additional statement on this subject prior to the hearings. MPC have been included in the preparation of this statement.

1. SDC confirm that EB71 and EB 72 were produced as desk-based studies
 2. Information relied upon is often several years old and therefore out of date.
 3. Suppositions are made with no supporting evidence.
 4. Some statements made with regard to Minchinhampton are misleading or incorrect.
 5. SDC do not appear to acknowledge or accept the historical context of Minchinhampton's development, nor do they set the settlement in the context of modern way of life in the modern world and accept how those changes have affected Minchinhampton.
 6. No proper assessment has been made on the possible negative impact of development on Minchinhampton.
 7. An illogical approach appears to have been taken by SDC in the determination to designate Minchinhampton as Tier 2.
 8. There has been no sensible dialogue with Minchinhampton Parish Council to discuss tier designation.
- Desk – based studies mean that it is possible that an appreciation of the elevation of the settlement with respect to its location to other settlements offering a wider range of services and facilities has been missed if the impact of contours on topography have not been appreciated. Walking distances are therefore not as presented in tables. Similarly, the lack of pavements and street lighting on routes out of the town to other settlements will not have been appreciated and so travel times do not rely on safe realistic walking routes. Where is the evidence for various statements made?

- Bus timetables relied upon are more than six years out of date. No evidence of bus timetables is provided, and it is not clear if SDC is also relying upon school bus timetables which run in term time only. Travel times and bus frequency should be accurately assessed to determine if public transport provision from and to the settlement is meaningful. Access to a MIU/A&E by bus/foot is scored as taking on average between 16 and 30 minutes? Is this realistic or even possible?
- SDC describe Minchinhampton as being among the district's most vulnerable large settlements, with there being pressure on its vitality, but no evidence is provided as to why the settlement's existing profile should make it "vulnerable", nor why this might cause pressure on its "vitality". This statement is not backed by evidence and is even incorrect and a proper assessment of the settlement would lead to a different conclusion. There is in fact good evidence of the town's existing vitality which is borne from the mix of people living in the town today. Designating Minchinhampton as Tier 2 to justify development for this reason is not supported by evidence.
- A key consideration is the provision of a library. Minchinhampton does have a library, but it is run and manned entirely by volunteers after Gloucestershire County Council decided to close it. So, its continued existence is dependent on good will and not certain. Nailsworth's library is a County Council run library. A further consideration is the provision of an NHS dentist. The dentist's surgery in Minchinhampton has been shut for over a year. Assessments made are not entirely accurate nor up to date.
- SDC refer to Minchinhampton as a village in their Local Plan material (for example "The minimal employment role of Minchinhampton village....."). Yet Tier 2 settlements are described as towns.

Minchinhampton has a village feel to it and is described in nearly all literature, publicity and in common usage as a village. That it has a technical status as a town is due to an historic charter dating back to the 13th Century. That has nothing to do with the actual type of settlement it is today. Is Minchinhampton's nomenclature as a town confusing the issue and clouding judgement?

- Minchinhampton has a centre that was designed before motor vehicles existed and every access point (N, S, E and W) to the centre is single file. Many of the older houses in the Conservation Area centre where the retail outlets are located have no parking and this adds to pressure on on-street parking. No assessment has been made of the impact that additional cars will have on the parking pressures in the town centre given the distance PS05 lies from the retail outlets and the poor walking access proposed.

Vehicle accidents and incidents in the past 15 years in the heart of the town's centre at the bottom of the High Street where retail outlets are based include a car driving into the side of the Chemists, another demolishing the wall opposite the Chemists, a bus damaging the wall of the Counting House, a car damaging the window sill of Corbel House as it manoeuvred out

of the way of oncoming traffic and another incident where a mistake at the crossroads saw one car driven into a run of parked cars which shunted a car into the wall of a cottage. It is a miracle that no pedestrians were killed or hurt.

It is possible that any development that expands the town's settlement boundary could bring so much additional traffic into the town centre that it becomes a zone to be avoided for those who wish to shop there, due to pedestrian safety issues, parking availability and general quality of the shopping experience? No assessment has been made of the impact on additional traffic on the town's ability to maintain its current retail provision or if it might even damage it.

In an email to Minchinhampton's MP on 15.06.21, SDC accepted that there is congestion in the centre due to traffic volumes and that any routing of additional traffic from a development on PS05 and PS05a would have to be to the north and not onto Tetbury Street. However, there is no plan to then prevent this traffic coming into the centre once it arrives on Butt Street if drivers wish to leave the settlement to the south, east or west. If congestion within Minchinhampton's centre is already accepted to be an existing problem due to traffic volumes and this has a knock on effect on pedestrian safety and enjoyment of the retail experience here, then if this experience continues to worsen with increasing numbers of traffic using the centre as a driving route, it is possible that this will have a negative impact on Minchinhampton's ability to keep attracting people to shop here. This has not been assessed or quantified.

Any suggestion that development could happen on PS05a with access to the south of the PS05a site will mean that traffic will arrive directly into the settlement's historic centre and would by SDC's admission have an immediate and direct impact on congestion here.

The potential negative knock-on effects of such a large-scale development at PS05 or PS05a on Minchinhampton's existing viability even with traffic exiting the site to the north needs to be properly assessed and mitigation proposals explored, costed, and directly funded.

Even if the Planning Inspectors were to assess SDC's designation of Minchinhampton as a Tier 2 settlement as accurate, could future development proposed in the Local Plan threaten Minchinhampton's ability to continue to deliver the level of services it provides today and thereby threaten that Tier 2 status?

- The logic of designating both Minchinhampton AND Nailsworth as Tier 2 settlements is not borne out by the evidence:

In the last 15 years in Minchinhampton, the Old Post Office, Trumpet Antiques, the News Agents, Sophie's restaurant, the electrical shop and the dentist's surgery, among others, have been converted back to residential properties. Stafford Cottage (clothes) is to close at the end of March and the Salon is currently empty and up for sale. The retail outlet centre has become smaller as businesses located in West End and Tetbury Street have closed or in the case of the Post office relocated to the High Street to replace a closing business there.

This contrasts with Nailsworth, Minchinhampton's closest retail centre two miles away, which has expanded dramatically over the same time to provide a very wide range of retail outlets which offer wide choices and which mean you can buy many things in one place with barely an empty shop today (if any) and a steady constant shop ownership. This reflects the modern

way of life, modern attitudes and modern shopping trends and how Minchinhampton's proximity to a much larger retail outlet such as Nailsworth makes it difficult for all but very specialist or "niche" shops (wedding dress, quality butcher, chemist), independently owned cafes, or those now being the only remaining shop of their kind (one corner shop and one financial base (Post Office)) to survive.

A lack of employment locally, increasingly poor public transport and Minchinhampton's elevation and location means that travel by private car has become the norm, making the people who live there more mobile. This has happened at the same time as shopping habits have changed and when it is more common for two parents in a family to work and therefore drive, especially where there is limited local employment. Supermarket shopping, online shopping, home deliveries, willingness to travel longer distances to shop by car, to shop conveniently on the way home from work, when a wide choice of products is now expected as the norm means that the retail centre of a settlement like Minchinhampton has inevitably got smaller. As these changes to the way we live have happened, the larger settlement of Nailsworth which lies two miles away has grown as a retail centre with more retail outlets opening while the evidence is that at the same time a number of those in Minchinhampton have shut.

Nailsworth is a purpose-built retail outlet centre with good, easy on street parking, designated car parks for shoppers and a wide variety of shops. It is also better served by public transport with its own bus station and is on a flat designated cycle route to other settlements. Nailsworth also provides a wide range of employment opportunities both in the town and within easy access of the town – all of this brings in a large number of people who shop there, supporting the retail outlets. This is in contrast with Minchinhampton.

How is it possible for Minchinhampton to compete as a Tier 2 settlement with another much larger Tier 2 settlement so close given the way people live today?

- Minchinhampton and Nailsworth are treated differently and regarded differently at an administrative level:

Minchinhampton falls under the Parish of Minchinhampton which includes Amberley, Box, Burleigh, Hyde and parts of Brimscombe and extends out towards Aston Down as well as taking in Minchinhampton Common. It has a Parish Council which covers all these areas. It has only two representatives at the District Council level to represent the whole area. Nailsworth has a town council and a town mayor and runs a busy town council office. The ward of Nailsworth covers mostly the built-up area of the town and has three representatives at District Council level. At a District Council level, the two settlements are treated and regarded differently.

At a County administrative level Minchinhampton joins with Chalford and Brimscombe/Thrupp and all these areas combined are represented by one County Councillor. Nailsworth has its own county councillor.

The level of infrastructure in Minchinhampton is also much poorer than in Nailsworth. It is not treated as an important settlement by Gloucestershire Highways and the present infrastructure is not coping with the volume of traffic that uses the roads as it is.

All of the points above lead us to ask that if SDC were to carry out a more robust, accurate, evidence based assessment of Minchinhampton, to fully recognise the impact of modern attitudes to shopping and the current way people live their lives, to fully appreciate the existing vitality of the settlement and to properly assess the possible consequences of large-scale development on the town's ability to thrive, then it would be more appropriate to designate Minchinhampton as a Tier 3 settlement?

The following evidence can be supplied to the Planning Inspectors if required:

Photographic/video evidence

Lists of retail and other facilities in Nailsworth and Minchinhampton

List of events on offer in Minchinhampton to show its vibrancy

Evidence of elevations and walking distances and lack of safe walking routes

Pattern of growth of Minchinhampton

Descriptions of Minchinhampton as a village