

**Stroud District Local Plan Review
Draft Plan, Additional Housing
Options. October 2020**

**Consultation Response on behalf
of
Whitminster Parish Council**

Prepared by:

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1.0 INTRODUCTION

- 1.1 This response has been prepared on behalf of Whitminster Parish Council in respect of the consultation document 'Stroud District Local Plan Review Draft Plan, Additional Housing Options' dated October 2020.
- 1.2 An additional highway response has been prepared by Mr Mark Baker of MBC Consulting Limited and this should be read in conjunction with the comments set out below and forms part of the objection by Whitminster Parish Council.
- 1.3 The Additional Housing Options Consultation has been instigated by Stroud District Council as part of a response to the Government's proposed change to the methodology for calculating the minimum housing requirement for each local authority. This revised Standard Method proposes an increase in the housing requirement for Stroud District from 638 homes per annum to 783 homes per annum. Based on current monitoring, the Council estimate that this could equate to an additional 1050-2400 new homes between now and 2040. The Council is therefore consulting on additional sites for housing that could be bought into the Local Plan if the Government confirm the revised methodology. These sites would also act as a 'reserve supply' to ensure the Local Plan delivers the housing it is already required to provide.
- 1.4 Whitminster Parish Council wish to **object in the strongest terms to the potential allocation of WH1014 Land at Grove End Farm, Whitminster** and this forms the focus of this consultation response.
- 1.5 As far as possible, we have tried to keep the response related to the questions posed in the Consultation and we have answered those we feel are relevant.

2.0 QUESTION 1 : WHICH STRATEGY WOULD YOU SUPPORT IF ADDITIONAL HOUSING LAND IS REQUIRED?

- 2.1 Whitminster Parish Council would generally support a combination of the Option to Intensify and the Option of Wider Dispersal should additional housing land be required. The Option to Intensify should be fully explored first.

3.0 QUESTION 2 : REASONS WHY OPTION/S ARE SUPPORTED

- 3.1 Whitminster Parish Council would support the Option to Intensify as it would make the most effective use of the highest tier settlements that offer the best opportunities to provide sustainable housing close to existing services and facilities.

- 3.2 If it is not possible to provide all the additional housing by intensifying existing sites at the most sustainable locations, the Parish Council would support some wider dispersal across the District on the basis that small amounts of housing spread between a number of settlements would assist in the viability and vitality of existing communities. However, as the Draft Local Plan states this should take account of the cumulative impact of successive developments and Whitminster has already seen a significant amount of development and two sites for further development have also been identified in the Draft Local Plan.

4.0 QUESTION 3 : DO YOU SUPPORT THE APPROACH OF IDENTIFYING RESERVE SITE/S?

- 4.1 The Parish Council do not support this approach. The sites promoted in the current consultation document have not been subject to the same scrutiny or public consultation as those in the Draft Local Plan. No evidence has been provided regarding the consideration of other sites. A failure to objectively consider other sites, on an evidence led basis, recently resulted in the West of England Joint Spatial Plan being abandoned. Whitminster Parish Council would prefer a review of the Local Plan in the event that the Standard Method is revised to fully consider all the options, including those previously discounted, in an objective and proper manner.

5.0 QUESTION 4 : WHICH STRATEGY OPTION WOULD YOU SUPPORT IF A RESERVE SITE/S IS REQUIRED?

- 5.1 The Council do not support the current approach to identifying 'reserve sites', particularly as this rules out the possibility of growth/intensification of identified strategic locations – these represent the most sustainable options available.

6.0 QUESTION 7 : NEW HOUSING SITES

- 6.1 Whitminster Parish Council do not wish to comment on sites outside their Parish.
- 6.2 In respect of WHI012 Hyde Lane, the Parish Council do not support this site on the grounds of poor highway/pedestrian access. The lane is narrow and unlit with no footway, there is a lack of inter-visible formal/informal passing places and the opportunity for pedestrian/vehicular conflict would be high.

7.0 QUESTION 9A : DO YOU SUPPORT/OBJECT TO SITE POTENTIAL GROWTH SITE 1 (PGP 1) LAND AT GROVE END FARM, WHITMINSTER

- 7.1 Whitminster Parish Council wish to **object in the strongest terms** to this location as a potential growth point (PGP)
- 7.2 Throughout the review of the Local Plan and the successive public consultation drafts, Whitminster has remained a **Tier 3 settlement with limited potential for growth identified**. In the Draft Local Plan 2019 it is stated 'This part of the District will experience no 'strategic' growth or development during this plan period' – the proposed site at **Grove Lane for 2,250 new houses is in direct contradiction** to this well rehearsed and presumably well considered statement. Yet, PGP 1 proposes to locate almost the whole of the maximum possible requirement for additional houses within the District (assessed as being 1050-2400 new homes) in one, poorly conceived, unsustainable location.
- 7.3 The settlement hierarchy put forward in the 2019 Draft Local Plan is based on the initial '2014 Settlement Role and Function Study'. The Council also carried out additional work in their '**2018 Settlement Role and Function Study Update**' (2018 SRFS) to further assist in their understanding of the current and future roles and functions of the main towns and villages in the District and help establish which places could support further growth and which places could not.
- 7.4 Whitminster was categorised as a 'medium' size village in the 2018 SRFS. Of the six villages in this category, Whitminster saw the greatest percentage increase in housing between the 2011 Census baseline and 2018 baseline. It also saw above average housing growth when compared to the District as a whole (7% increase in growth, compared to a District wide average of 6% increase in growth). **Whitminster** is amongst the settlements considered to have '**already experienced significant proportionate growth**' with an outstanding commitment in 2018 to extend this growth to 16% (since implemented). Whitminster is described as being a settlement that could benefit from some planned development, targeted and scaled to maintain diversity and demographic vitality, but it is recognised as having a healthy working age population that does already sustain services and facilities.
- 7.5 Following the research and outcomes of the 2014 and 2018 studies and the Local Plan consultations, Whitminster Parish was considered to remain a settlement with scope for lesser levels of development, being mainly a dormitory settlement. This calculated approach is now **completely at odds** with the proposed PGP, with green field land adjacent to the village being considered suitable for a major growth point.

- 7.6 The site at Grove Lane would **not comply with Draft Core Policy CP3** which identifies Whitminster as a Tier 3a Settlement (Accessible Settlements with Local Facilities) where further development should be focussed inside settlement limits or exceptionally on the edge of settlements to **meet local needs**.
- 7.7 The SALA Assessment 2020 concluded that the area promoted to the north of Grove Lane (WH1014) (part of the current proposed PGP) was not policy compliant.
- 7.8 A separate **highway assessment** has been provided by a transport planning consultancy regarding the suitability and sustainability of this site. However, a new core policy in the Draft Local Plan, **DCP1 'Delivering Carbon Neutral by 2030'** clearly states that all new development should be designed to **discourage use of the private car**, irrespective of fuel source and should **prioritise (in order of importance) walking**, cycling and public transport. By locating a major housing site between a major A road and the M5 this clearly encourages use of the private car directly contradicting the aims of this policy. The opportunity for walking (being the highest ranked preferred mode of transport) to access services and facilities beyond those offered at a local level would be extremely low, particularly when compared to those at other strategic sites. The site is also a considerable distance from a railway station and is poorly served by public transport. The SALA Assessment 2020 appears to take no account of the accessibility of the site, its reliance on the car or its impact upon the local infrastructure.
- 7.9 In terms of employment, the 2018 SRFS recognises that just 6% of Whitminster residents work within 2km of home and a below average number of residents (when compared to other settlements in the District) have jobs within the District's administrative boundaries. The majority out commute for work to Gloucester, South Gloucestershire/Bristol and Cheltenham. **The residential land take proposed far outweighs that proposed for employment**. The proposal would not address the current imbalance, but **add to the numbers out commuting**. It is far more sustainable to allocate new housing adjacent to existing employment centres.
- 7.10 The NPPF at paragraph 72 considers how large scale development can be best achieved. It states that any new settlement should be well located and designed and supported by the necessary infrastructure and facilities. Local Planning Authorities (LPA's) should **work with the support of local communities** to identify such sites. In doing so, LPA's should 'ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself, or in larger towns to which there is good access'. Any development should also consider opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for environmental gains.

- 7.11 There is little detail on the extent of the infrastructure development and the current location offers no opportunity to tap into a local economy as Whitminster itself offers limited employment opportunities. The limited environmental gains offered would not in any way outweigh the loss of good agricultural land and wildlife habitat, but create a very large residential development that would be reliant on the private car for work, services such as healthcare, secondary school education, financial services, leisure etc. This has to **fall foul of the Council's new aim for Carbon Neutral development** and the aims of the NPPF when considering the best locations and opportunities for strategic growth.
- 7.12 The Draft Local Plan states that the **precious landscape and habitats** will remain high priorities. The development proposed fails to take account of wildlife corridors, the value of **historic orchards** that are a diminishing valuable habitat and part of the village's history, two of which immediately abut the development site (see Whitminster Design Statement 2014), the impact upon key local and national wildlife sites and the valued views both to and from the west.
- 7.13 The impact on the **River Frome Key Wildlife Site** which would abut the proposed development has been ignored and overlooked by the promoters and seemingly downgraded in its importance as only being of local nature conservation interest. Little reference is also made to the **close proximity of Severn Estuary Special Protection Area, Special Area of Conservation and Ramsar Site**. The wildlife impact of such a development, on such a scale, would be far reaching. This is not the location for this scale of development. The area should not be considered as a suitable PGP. It is not enough to carry out an Initial Phase One study within the boundaries of the site, the impact of such a large housing/commercial development would not be limited to within the site boundaries.
- 7.14 In June 2016 Stroud District Council commissioned a report on the 'Severn Estuary (Stroud District)' based on visitor survey responses. This was intended to provide a baseline of visitor data and recreational pressure to inform and 'design an effective impact avoidance strategy for housing development coming forward in the District' (paragraph 1.4). Whilst the impact of tourism (both local and from further afield) has to be carefully considered, so too does the impact of locating a major new settlement on the **door step of this European Marine Site (EMS)**. The report notes that the EMS extends well beyond the survey area.

- 7.15 The 2016 Severn Estuary report was published when there was a requirement for 7,700 new homes across the District between 2015-2031. The impact of potential local tourism from these new homes needed to be assessed in the context of such a precious resource. We are now talking about considerably greater housing targets, with additional/reserve sites – the development proposed alone would see an **additional 2,250 new households** within the catchment of the European Marine Site. The impact of this cannot be underestimated and should be fully assessed, including the increased recreational impact and the **cumulative effect** of the housing proposed within the catchment of the EMS i.e. Wisloe Garden Village, Hunts Grove, Eastington etc.
- 7.16 The development of low impact tourism and the recognition of this part of the Severn Vale as an attraction to visitors, when carefully managed, does offer some advantages for the local economy. The District Council have taken steps following the publication of the Severn Estuary Report to mitigate for the projected levels of tourism. Whitminster Parish Council wish to encourage low level tourism as it benefits local businesses. This would be undermined, however, with such a large development at its entrance. A development of this massive scale will **urbanise** what is cherished rural area for locals and visitors alike.
- 7.17 In recent years your Authority has refused to grant modest developments adjacent to the site on the basis of **landscape impact** and these views have been supported by Appeal Inspectors. The area has been described as being largely rural in context with far reaching views of open countryside to the west (towards the River Severn). Part of the landscape harm identified was not only by those on foot, but also the **experience of passers-by and users of the road network**.
- 7.18 The site is a '**greenfield**' site, undeveloped field pastures, interspersed with small wooded copses with a strong rural feel, separating and providing a buffer between the village and the M5.
- 7.19 The Natural England Land Classification Map South West Region (ALC006) shows the land as being Grade 3 agricultural land. The promoters of the development refer to the Natural England Map and state that the 'entirety of the Site is located on undefined Grade 3 (Good to Moderate) agricultural land'. However, the Natural England maps are only intended for strategic purposes and as such 'are not sufficiently accurate for use in assessment of individual fields or sites'.

- 7.20 Government legislation and policy seeks to **protect the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals**. The NPPF requires LPA's to make decisions that contribute to and enhance the natural and local environment by protecting landscapes, geology and soils and considering the economic and other benefits of BMV agricultural land. LPA's should try to use areas of poorer quality land instead of higher quality land.
- 7.21 The site, or parts of the site, could be within a Grade 3A agricultural land classification as the Natural England Maps do not distinguish between Grade 3 sub-grade A or B. It is important to establish this independently as Grade 3A constitutes BMV agricultural land. Natural England should be consulted on any BMV sites for development over 20 hectares (the site covers an area of over 100 hectares).
- 7.22 Grade 3 A land is capable of producing moderate to high yields and Grade 3 B land is capable of producing moderate yields, both have value and before destroying land for food/crop production, all brown field sites should be exhausted. The impact of both Brexit and the pandemic have turned attention to the necessity for self sufficiency and the loss of valuable agricultural land.
- 7.23 The SALA Assessment 2020 of the northern portion of the site recognises the **landscape constraints** and the impact of development in this regard. The site is considered to be of **medium to high sensitivity**. Views from the adjacent Cotswold Escarpment also have to be taken into account.
- 7.24 The site is also visible from the **Industrial Heritage Conservation Area** and would detrimentally impact upon the setting of the listed building, The Forge. A full, considered assessment of these heritage assets should be carried out. It is of note that the **2020 SALA Assessment when considering the impact upon the Conservation Area** of only the northern portion of the site concluded that this alone could **preclude development**. The special character of the Conservation Area is in large part derived from the juxtaposition of the industrial and agricultural land uses, the proposed development would destroy the agricultural, rural backdrop.
- 7.25 **Noise, vibration and air pollution** would impact upon the health of the potential occupiers of these homes. Whilst mitigation can alleviate pollution to some extent it cannot mitigate that suffered in outdoor amenity areas etc. We should really be asking if this location is appropriate for high density residential development, wedged between a major A road and one of the busiest motorways in the country, and whether it will provide a high quality, safe environment for future generations to inhabit?

- 7.26 Noise pollution, for example, is often mitigated by mechanical ventilation. The ability to open a window and ventilate habitable rooms naturally is something most of the population take for granted, to create a development reliant on artificial mechanical ventilation due to its proximity to a high source of noise and air pollution will inevitably create a very poor environment for its occupants. In this regard, the scheme would fail to address the provisions of a new policy in the Draft Local Plan, Delivery Policy DHC5 'Wellbeing and healthy communities'.
- 7.27 The **scale of the development would simply overwhelm** the social equilibrium of the village and change the very nature of this part of the Severn Vale forever. Whilst Whitminster Parish Council has been and will continue to be supportive of small scale developments that serve and support the local community, and has accepted a number of these in recent years, it cannot support a development of this scale. A scale of development that until now, as part of a reactionary response by the District Council, was not considered at all appropriate for Whitminster.
- 7.28 The scale of the development also prompts the question about the **rate of delivery**, the timescales involved, the **continued practice of land banking** and who benefits from such a development. Smaller, dispersed developments often get implemented quicker, provide employment for local people, create a stronger local economy dispersed across a wider area and are often of higher quality than large developments by regional and national house builders – this has been recognised in the emerging White Paper and the NPPF.
- 7.29 The proposed site and scale of development **flouts all the principles expounded in the Local Plan Review and resultant Draft Local Plan**. For the reasons set out above Whitminster Parish Council on behalf of local residents **OBJECT** to this site, both as an additional housing site and a reserve site.