

WHITMINSTER PARISH COUNCIL

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Planning Department
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
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GL5 4UB

F.A.O. Cris Lancaster

15th June, 2023.

Dear Sirs,

Application No. S.23/0440/OUT

Location: Land North Of Grove Lane Whitminster Gloucestershire

Description: Outline application with all matters reserved for mixed use development comprising up to 1,240 residential dwellings, primary school, local centre of 1.6 ha (comprising commercial business and service uses (Use Class E), drinking establishment and hot food takeaway (Sui Generis) with a GIA limit of 4,000 sq m of which no more than 1,207 sq m (GIA) shall be used for retail (Class E(a)). The maximum single retail unit size shall comprise of no more than 835 sq m), local transport interchange hub, sport and recreation facilities. Associated ancillary facilities, works, infrastructure, open space including allotments and landscaping. Vehicular access from the A38 and Grove Lane

At a recent meeting of Whitminster Parish Council the above application was considered. Council resolved to **OPPOSE** the application and would ask that it be refused. The reasons for objecting and relevant comments are set out below:

- The prevailing Stroud District Local Plan includes a defined Settlement Boundary for the Parish of Whitminster. The site proposed is outside of the Settlement Boundary and would extend the village dramatically beyond the A38 toward the M5 motorway. This is in a direction that is contrary from the location proposed for modest expansion of the village, arrived at through public consultation and supported by the Parish Council in response to consultations initiated over the Local Plan review currently ongoing. The proposed development is not a modest Rural Needs Affordable Housing

Exception Site and hence to grant permission would be a departure from the established precedent applied since the inclusion of Settlement Boundaries within Stroud District Local Plans dating from 1992. It would also be contrary to the reasons given for refusal in regard to a number of recent applications concerning land to the East of the A38 and similarly outside of the Whitminster Settlement Boundary.

- Policy CP3 of the prevailing Stroud District Local Plan sets out a hierarchy of settlements. Whitminster is identified as a Tier 3 Settlement defined as having capacity to provide lesser levels of development. 'Lesser' is less than a modest level, being the definition of development growth potential held by Tier 2 Settlements. Quite clearly development of the scale proposed is inappropriate for a Tier 3 Settlement and conflicts with the Stroud District Local Plan.
- The application refers to employment and other ancillary uses but does not address educational nor childcare needs. A development of this scale could potentially generate a need to provide places for over 1,500 children of school age. This is far beyond the capacity of the small village school and nearby secondary school provision. As the application includes no proposals to address this need locally it will be necessary to travel to existing urban centres or new schooling provision to be provided elsewhere. There is an irregular bus service available within the village but no rail nor other transport links. The development would therefore place significant reliance on the use of private motor vehicles and would be in conflict with policies of sustainability.
- Large scale development of the nature proposed has an impact not only on the host settlement but also at a wider District, County and regional level. It needs to be planned for and considered strategically. The strategic allocation of development land is addressed through the Stroud District Council Local Plan that considers wider impacts across the District and neighbouring authority areas. The proposed development is not included in the current Adopted Local Plan nor does it feature as a proposal recommended within the emerging Local Plan, which has been the subject of widespread consultation.
- The applicant has failed to address the need for development of the proposed scale and in the proposed location at the present time.
- The applicant has failed to engage in any meaningful public engagement to assess public views or to identify the potential impact on the local community.
- The applicant has not demonstrated any consideration of alternative sites that may be more suited to a development of this scale.
- This application has been submitted in tandem with an application concerning land South of Grove Lane and larger in scale. Clearly the two applications cannot be considered in isolation and this approach is a contrivance. It must also be noted that permitted and pending applications on land between the M5 motorway and Stonehouse, including a football stadium amongst others, must be taken into account when considering the further impact these applications would have, if permitted, on local infrastructure and highways implications.
- The proposed location will be susceptible to the impacts of noise and pollution from the nearby M5 motorway and proposed football stadium thus having potential for emotional and physical harm to potential occupants.
- The information provided in regard to highways measures and the impact on the local and regional network and existing traffic flows is limited. The local roads are already

congested and at capacity at peak commuting and school times whilst hazardous situations frequently occur at nearby motorway junctions that are at capacity. The allocation of employment land is insufficient to provide adequate local employment opportunities and it is unrealistic not to expect that residents of the proposed development would commute to larger centres such as Bristol, Gloucester, Cheltenham or further afield. Therefore, the proposals would result in a dramatic increase in vehicular movements causing widespread congestion.

- Taken together with permitted and pending applications to the West the proposals, if permitted, would create urban sprawl from the town of Stroud beyond Stonehouse and across the M5 corridor into the villages of the Severn Vale. This would be to the detriment of the character of the locality and impact on the view from and setting of the Cotswold escarpment, being an Area of Outstanding Natural Beauty as the backdrop to the Severn Estuary RAMSAR designated area beyond.
- As the site would not be a strategic allocation for housing there has been no opportunity to plan for the provision of local service such as the expansion of General Practice medical services, diagnostics or hospital provision across all grades. This would therefore place an unacceptable burden on existing services that are under strain and be to the detriment of the health and wellbeing of the current local population.
- The site is impacted by the presence of critical high-pressure pipelines and other existing services.
- Development would lead to the loss of footpaths featuring within the Whitminster Village Walks guide that was progressed as a Millennium Project and has recently been demonstrated to be invaluable in maintaining good mental health and fitness through experiences arising from the pandemic.
- Increases in traffic volumes would impact on quiet roadways in the vicinity currently used for mixed modal transport to the detriment of highway safety and sustainability objectives, as those moving to walking or cycling for local journeys cease doing so as it becomes hazardous.
- Local knowledge has identified area of the land used for the disposal of waste materials and are likely to be hazardous.
- Inclusion of a transport hub is of little value in a location where public transport options are limited and where the use of private motor vehicles will be the only practical means of reaching the services and facilities of surrounding higher order settlements.
- Council is concerned at the loss of agricultural land contrary to national policies aimed at achieving self-sustainability in agricultural production.
- The proposed development will give rise to the loss of a valuable environmental habitat and wildlife corridor. Local knowledge also suggests the presence of a high level of biodiversity and protected species that cannot be disturbed.
- Although noted as not being susceptible to flooding the development of such a large area will undoubtedly have an impact on water penetration and run-off, irrespective of mitigation measures, downstream in local catchment areas. The River Frome and other tributaries feeding the River Severn already over-top at times of heavy rainfall and the situation will only be made worse if this development is permitted giving rise to flooding in local villages.
- There is no capacity for additional foul water disposal or treatment capacity.

- The scale of development, especially when combined with the tandem application, could essentially increase the population of the village eightfold or more. This would destroy the community that has grown organically over centuries and would place an unacceptable strain on local facilities and the community at large. This would be exacerbated by the impact of the recently consented solar farm wrapping around the village to the West.
- The proposals would clearly have a direct and derogatory impact on Moreton Valence to the North (as well as all local villages) and Council fully endorses and supports the comments made by Moreton Valence Parish Council that duplicate some of the comments made above. This comments in object are repeated below:
We object to this application using Material Planning Considerations as follows:
This is not in the existing or emerging local plans.
The loss of privacy for existing homeowners especially those on the A38 backing onto the development.
Highways issues as outlined in the Highways Agency response and those of other residents.
The amount of extra noise this development will cause in an otherwise quiet village.
The size of this development which is extraordinarily massive in context with its location and the impact it will have on this small village.
The loss of landscape and green fields which is irreversible.
The loss of wildlife habitat.
We also note:
The severe lack of secondary school places in this area.
The infrastructure in this area is already abysmally inadequate even without this development. This includes pedestrian and cycle routes/paths, especially on the A38 but also on the surrounding lanes.
Car use is essential in this rural location. Station parking is woefully inadequate, even without this development.
By splitting this application and that South of Grove Lane, it potentially dilutes the impact of both these developments on the local area and it's residents.
What will be the physical and mental health implications for those resident's living so close to such a busy motorway?
Recently built dormitory towns in this locale have been a disaster with huge crime rates. There are no local amenities or jobs for these thousands of new residents.

To reiterate, Whitminster Parish Council objects in the strongest possible terms to this application as it would be outside of the defined Settlement Boundary, is not a strategic

allocation in the Stroud District Local Plan and neither is it proposed as such in the emerging plan and it would be development of a nature not consistent with the Whitminster Village Design Statement that stands as supplementary planning guidance.

Yours faithfully,

A handwritten signature in black ink, appearing to be the letters 'WPC' in a cursive, stylized font.

WHITMINSTER PARISH COUNCIL