



30<sup>th</sup> November 2020

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

3<sup>rd</sup> Floor  
Regent House  
65 Rodney Road  
Cheltenham  
GL50 1HX

01242 230066  
www.ridge.co.uk

Dear Sir/Madam

**REPRESENTATION TO STROUD DISTRICT LOCAL PLAN REVIEW: ADDITIONAL HOUSING OPTIONS CONSULTATION - THE NEW LAWN, NAILSWORTH**

This representation has been prepared by Ridge and Partners on behalf of Ecotricity Group Ltd in relation to the Stroud Local Plan Review: Additional Housing Options Consultation. This consultation has been prepared in response to the Government’s standard method consultation, which has the potential to increase the amount of housing land required in Stroud District between now and 2040. This consultation looks at additional housing options and sites which could be brought into the emerging Local Plan, if the Government’s standard method is confirmed.

**Spatial Options**

Part 1 sets out a number of spatial options that could deliver additional housing growth. This includes:

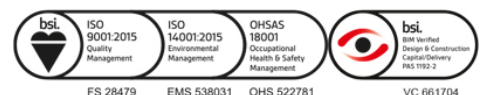
- Option A: Intensify – Additional housing within the boundaries of sites identified within the Draft Local Plan.
- Option B: Towns and Villages – Further housing sites at smaller towns and larger villages.
- Option C: Additional Growth Point – a new growth point
- Option D: Wider Dispersal – a range of additional housing sites across Tier 2, 3 and 4 settlements.

The consultation paper indicates that there could be a need to find land for an additional 1,050 – 2,400 homes between now and 2040. In this context, it is considered that there will need to be a combination of the above options to deliver this level of growth.

Ecotricity Group Ltd is the landowner of The New Lawn, Nailsworth, as proposed to be allocated under PS06 within the Draft Plan, which states the following:

*‘Land at New Lawn, as identified on the policies map, is allocated for a development comprising 80 dwellings and associated community and open space uses, together with enabling infrastructure, subject to the satisfactory relocation of Forest Green football club. Detailed policy criteria will be developed where necessary to highlight specific mitigation measures and infrastructure requirements. A development brief incorporating an indicative 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.’*

Ecotricity Group Ltd supports the allocation of the site for residential development but believes that the site has capacity for a greater number of dwellings; previous representations have been made to the Local Plan Review: Draft Plan on this basis. As such, there is the opportunity for intensification of this site under Option A identified above. The background to the site, and opportunities for intensification, are set out below.



## The New Lawn, Nailsworth

The Local Plan Review: Draft Plan allocates the site for 80 dwellings, as well as associated community and open space uses and enabling infrastructure, subject to the satisfactory relocation of Forest Green Rovers football club. The intention is to relocate Forest Green Rovers to a new stadium on land to the north of the A419, adjacent to M5 Junction 13, and land has been allocated for this purpose under Draft Plan PS20. Planning permission has also been granted for the new stadium (reference S.19/1418/OUT). In this context, Ecotricity Group Ltd are confident on the delivery of a new stadium for Forest Green Rovers in a timely manner, which will free up the site at New Lawn for housing in line with the allocation.

### Planning History

The New Lawn Site has been the subject of 2 planning applications. Firstly, application reference S.17/0850/OUT was submitted for *'the demolition of The New Lawn Football Stadium (Forest Green Rovers FC) and re-development to provide the erection of up to 95 dwellings, up to 0.11 hectares of community uses (which may include D1/D2/A3/B1 uses), landscaping, open space, associated access, parking and infrastructure.'* This was withdrawn in November 2017 whilst discussions progressed on the new Stadium application. This application was resubmitted in April 2018 (application reference S.18/0815/OUT for 95 dwellings), and this application is awaiting determination by Stroud District Council.

For the above applications, a suite of technical documentation was prepared and submitted. These reports conclude that the site is well located to the existing local services, free of technical constraints, and can be effectively integrated with the existing built form and surrounding countryside. As part of the original application submission, an illustrative masterplan was prepared which shows how 95 dwellings could be accommodated on the site.

To summarise the key planning considerations as assessed as part of the technical documentation prepared for the above application:

#### *Flood Risk and Drainage*

The proposed site falls outside any areas identified as being at risk from flooding. A Flood Risk Assessment and Drainage Strategy highlights the proposed strategy for surface water drainage which includes the use of SUDS features, which will also deliver biodiversity enhancements, as well as setting finished floor levels 150mm above the surrounding ground. The report concludes that the proposal will manage the risk of flooding and conform to the requirements of the NPPF in terms of flood risk.

#### *Landscape and Visual Considerations*

The site contains a number of mature trees and hedgerows around the periphery of the site as shown within the Arboricultural Statement. The proposals can be sensitively designed to ensure that they do not result in the removal of any mature trees. If any limited removal of hedgerows or scrub does take place then these will be more than compensated for by the proposed landscaping scheme. In respect of trees, the Council's Arboricultural Officer has raised no objection to the application. A Landscape Visual Impact Assessment has also been undertaken to demonstrate that the proposals will not have an impact on the openness or setting of the surrounding landscape. Given the topography of the land and the existing built form at the top of the ridgeline the masterplan has carefully considered the interaction with the town and the surrounding landscape setting. Given the nature of the site and its existing use, the LVIA concludes that there will be a neutral to slight beneficial impact on landscape fabric and landscape character. It also concludes that there will be no significant effects or harm to the Cotswold Area of Outstanding Natural Beauty (AONB) and, in certain instances, enhanced at a localised level. Key mitigation and enhancement measures include:

- Retention of existing landscape features including existing shrub and tree vegetation to the boundaries of the Site (including species rich hedgerow to the western side)
- New tree and shrub planting would further reinforce existing levels of vegetation
- Replacement of the larger block form of the stadium and hardstanding areas with a more varied pattern of buildings interspersed with gardens, planting and multi-functional spaces across the Site.
- The maximum height of the proposed development would be comparable to existing buildings and considerably lower than some vertical elements on the site at present (e.g. floodlights).
- Whilst footpaths adjacent to the Site would not be effected directly, proposed landscape improvement to the Site boundary areas, adjacent to the paths (including improved accessibility) would be likely to provide a physical and visual enhancement.
- Creation of publicly accessible open space and species rich/biodiverse areas would provide enhancement of and connection with GI networks across the Site and beyond
- Features within the immediate surroundings such as the adjacent woodland that is characteristic of the Cotswolds AONB would remain unaffected by the Proposed Development.

#### *Ground Conditions*

The Ground Conditions Desk Study highlights that based on historic land uses and its current operational use, the overall risk from land contamination at the site is considered to be low, and low to moderate for a re-developed site, but would need to be confirmed by appropriate intrusive investigation, testing and assessment of the results of the investigation.

#### *Highways*

The Transport Assessment highlights that the site is in a location where, in travel terms, a sustainable development can be achieved. To assess the traffic impact of the proposed development, detailed capacity analysis has been undertaken of the site access roundabout junction between Another Way and Nymphsfield Road, the mini-roundabout between Spring Hill and the A46, and the A46 / B4014 priority junction during the weekday AM and PM peak hours when the demand for travel is greatest. The traffic generated by the proposed development is expected to have no significant effect on the operation of these junctions. It is considered that the proposed development accords with national and local policy, in that it will provide a sustainable development with safe and suitable access for all people. It will have access to existing facilities without the need for car travel, thus enabling travel by sustainable modes. There is therefore no reason in transport terms why the proposed development for 95 dwellings should not be permitted. As part of the application, Gloucestershire County Council has confirmed that the proposed 95 dwellings meet the criteria of the NPPF and recommended no highways objection be raised subject to conditions.

#### *Heritage and Archaeology*

The Heritage Desk Based Assessment confirms that the site has been subject of an archaeological evaluation in 2004 which identified no archaeological remains. Following that, the site was developed for the football stadium and attendant infrastructure. On this basis, there is considered to be no potential for archaeological remains within the site. Detailed assessment of the 'setting' of heritage assets in the wider vicinity of the site has been carried out. Due to the undulating topography, tree cover and post-war residential development, which greatly restricts inter-visibility with the site, no adverse effects upon heritage assets have been identified with regard to removing the current football stadium and constructing housing. The hedgerow defining the western boundary of the site comprises an 'important' hedgerow under the criteria for archaeology and history of the 1997 Hedgerow Regulations, as it is illustrated on the c. 1840 Tithe maps. This hedgerow can be retained as part of the proposed development.

*Ecology*

An Ecology Survey has been undertaken which concludes that the redevelopment of the site for housing will have no significant effect on statutory designated sites, particularly Rodborough Common SAC. The main ecological receptors on site were an historic hedgerow along the western boundary combined with a verge of species-rich grassland, and protected species identified were slow worms, bats, birds and badgers. The historic hedgerow will be retained along with the associated grass verge so that any effect of the proposed development will be not significant. The main protected species affected by the development is the slow worm, and mitigation during construction will ensure that the effect of the proposal is minimised. Any significant effect on bats using the site will be mitigated by sensitive construction methods and appropriate lighting regimes. The effects on birds will be mitigated by sensitive timing of construction to avoid the bird breeding season. Enhancement measures include newly created grassland, additional tree planting, bat and bird boxes and the provision of SUDs features.

**Intensification of the Site**

As set out above, the site is allocated in the Local Plan Review: Draft Plan for 80 dwellings. Ecotricity Group Ltd supports the allocation of the site for residential development but believes that the site has capacity for a greater number of dwellings. Up to 95 dwellings has been tested through the submission of planning applications on the site, which has involved assessment in respect of detailed technical matters. The above assessment identifies that the site is free from constraints and there is no reason why further development could not be accommodated on the site.

This is in line with key policy objectives, particularly within the NPPF, to make the most efficient use of land. Paragraph 122 identifies that Planning policies and decisions should support development that makes efficient use of land and Paragraph 123 highlights that *'where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.'*

Given the work undertaken to date, there is no reason why the site cannot deliver further housing in line with this aim, and it is considered that the site has the potential to deliver a greater number than 95. In this context, it is considered that the allocation of the site for 100 dwellings would be appropriate. This greater number would ensure a viable mix of housing sizes can be delivered, including a greater proportion of smaller 2-3 bedroom starter homes rather than more larger 4 bedroom properties.

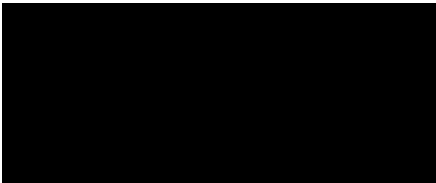
Ecotricity Group Ltd also aim to utilise offsite, modular construction techniques with the ultimate aim of the proposed development being zero carbon. This would assist in the delivery of Stroud District Council's aspirations to become Carbon Neutral by 2030 ahead of the Government target of net Zero Carbon 2050 (in line with emerging Core Policy DCP1).

**Summary and Conclusion**

Ecotricity Group Ltd support the allocation of the site at PS06 for residential development but believe that the site has capacity for a greater number of dwellings. This is in line with Option A of the Additional Housing Options Consultation which considers the intensification of existing allocations. The site has been subject to a host of technical assessments that accompanied the application for the redevelopment of the site for 95 dwellings, up to 0.11 hectares of community uses (which may include D1/D2/A3/B1 uses), landscaping, open space, associated access, parking and infrastructure. The detailed work undertaken as part of this application reinforces the suitability and achievability of the site to deliver a greater number of dwellings than currently allocated. The site is reasonably unconstrained in terms of factors affecting the potential layout and density of development and the NPPF is clear that in this context, density should be increased where possible. As such, in line with the NPPF, and the aim of

making efficient use of land, it is requested that the Council revisit the capacity of the site and it is suggested that the site is allocated for 100 dwellings. This would assist the Council in delivering a potentially greater number of dwellings as part of the Local Plan Review, if the Government's standard method is adopted.

Yours faithfully,



**For Ridge and Partners LLP**