



RIDGE

**STROUD DISTRICT COUNCIL
LOCAL PLAN REVIEW
(EMERGING STRATEGY PAPER
NOVEMBER 2018) PS06
ECOTRICITY**

December 2018



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Prepared for

Ecotricity

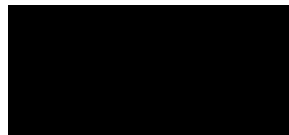
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1. INTRODUCTION

- 1.1. This representation has been prepared by Ridge LLP on behalf of Ecotricity Group Ltd in relation to the consultation on the Stroud District Local Plan Review: Emerging Strategy – November 2018 (LPR). Ecotricity is the longstanding promoter of Land at M5 Junction 13, West of Stonehouse.
- 1.2. The Stroud District Local Plan (LP) sets out the Council’s strategy for distributing development within the District. The plan was approved in November 2015.
- 1.3. In line with best practice the District Council has now commenced the process of reviewing the operative LP. An Issues and Options paper was released for consultation during the autumn of 2017. Submissions made to that consultation paper highlight that a lack of jobs within Stroud District is of great concern to local people; meaning that many people living within the area need to commute to larger city areas for employment. That consultation process also highlights the most popular locational choice for additional growth is along the M5 corridor.
- 1.4. Following detailed consideration of the responses received from the 2017 Issues and Options consultation, the District Council has now published its emerging development strategy in the form of the LPR. The LPR illustrates how the District seeks to meet its growth requirements over the next 20 years identifying sites for potential development.
- 1.5. On behalf of Ecotricity, Ridge LLP have made the following three representations to the LPR;
- Referencing site PS06: New Lawn Housing
 - Referencing site PS20a: M5 Junction 13
 - Referencing site PS20b: M5 Junction 13
- 1.5. The plan accompanying PS06 is detailed below.



1.6 The representation the subject of this document makes specific reference to site PS06 which states;

PS06 The New Lawn, Nailsworth Up to 80 dwellings and community uses – subject to relocation of football ground

1.7 This representation will aim to address the following key question which is raised in the LPR

Making places: potential sites and alternatives...

If you would like to comment about whether we have identified the right settlements for growth, or whether other settlements have growth potential,

Question 5.1a

*Assuming some growth is desirable, have we identified the best site(s) at each town and village? (Please clearly specify which settlement(s) your comment(s) relate to, and use the **site reference numbers** shown on the map, where relevant).*

1.8 This representation supports the proposed potential site for residential development, which is located on a site within a settlement identified as a local service centre where modest levels of growth will be delivered. However, it will be demonstrated within this submission that the site is suitable, and has the capacity, for an increased number of dwellings. Equally, it will be set out that reference to the community use should be omitted. As such this representation will demonstrate that the following wording is more appropriate for this site;

PS06 The New Lawn, Nailsworth: Up to 100 dwellings – subject to relocation of football ground

Structure of this Report

1.9 Section 2 of this representation looks at the proposed site identified as PS06 in more detail and will provide a summary of the site and surrounding area, whilst also referencing any planning history. Reference will also be made to the current planning application which proposes the relocation of the football ground. Section 3 will assess relevant planning policy and guidance, including the revised NPPF. Section 4 will reconfirm the support to the principle of residential use on the subject site and will propose amended wording to the policy. In doing so Section 4 will analyse the site's potential in terms of increased use and capacity, confirming that it meets the sustainable objectives and the identified national and local plan policy. Section 5 will provide conclusions.

2. SITE PS06a

2.1 Guided by the responses made to the 2017 Issues and Options consultation, the District Council's emerging development strategy seeks:

i) *To concentrate development requirements at locations where there is best access to services, facilities, jobs and infrastructure,*

2.3 Ecotricity supports the principle of this emerging development strategy in relation to the residential use. However, it is of the opinion that the community use is not required, that there is no evidence base case for such uses and that instead a more efficient and effective use of this brownfield site should be made to support the delivery of much needed new housing at sustainable market town locations.

Location

2.4 The subject site is situated to the west of Nailsworth and is currently occupied by Forest Green Rovers Football Club. It comprises some 2.8ha of brownfield land. The existing stadium dominates the site which is bounded to the east by the access road known as Another Way, beyond which are sports fields. To the west and north are open fields whilst woodlands form the southern boundary. The site is within close proximity of a primary school, Arkell Community Centre and a number of dwellings.

2.5 The site falls outside, but adjoins, the Cotswolds Area of Outstanding Natural Beauty (AONB). The site does not fall within any landscape designations. The site does not comprise any heritage assets, nor is it located in close proximity to any such asset. The site does not contain any designated features of biodiversity interest and it is not located within or adjacent to an area of nature conservation value. Woodchester Park SSSI is located some 400m to the northwest of the existing stadium site.

2.6 The site is located within the market town of Nailsworth, which offers a high order and wide range of facilities, services and employment opportunities.

2.7 The site is also served by regular good bus services with direct links to the heart of Nailsworth, as well as the larger settlements of Stroud and Cheltenham.

Planning History/current applications.

2.7 Planning permission was granted for the existing stadium in 2006 (ref: S.04/0096/FUL). In 2018, planning permission was granted for alterations to the west terrace of the New Lawn Stadium comprising an additional 100 seats.

2.8 In April 2018, an outline planning application was submitted by Ecotricity for the demolition of the New Lawn Stadium and its re-development to provide the erection of up to 95 dwellings, upto 0.11 hectares of community uses (which may include D1/D2/A3/B1 uses), landscaping, open space, associated access, parking and infrastructure. All matters are reserved except access (using existing access). That planning application has yet to be determined.

2.9 A extant planning application is under consideration for the relocation of the existing football club on land near junction 13 of the M5 Motorway near Stonehouse. This application, referenced S.16/0043/OUT, incorporates the following;

- 5,000 capacity football stadium and other ancillary uses (Use Class D2);
- Two full-sized grass pitches and a goal practice area for First Team use;
- Parking for c.1,700 vehicles, with signalised site access and dualling of A419;
- A signal controlled pedestrian and cycle crossing of the A419, with a combined footway/cycleway on the south side of the A419 linking to National Cycle Route 45 (NCN45) at Grove Lane;
- A scheme for improvements to NCN45 from Stonehouse
- Bus connection between the proposed stadium and Grove Lane to enable buses serving the West of Stonehouse development to serve the Revised Scheme on match days.

3.0 NATIONAL AND LOCAL PLANNING POLICY

National Planning Policy Framework 2018 (NPPF)

- 3.1 Chapter 2 of the NPPF discusses the requirement to achieve sustainable development. Chapter 8 confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, these are as follows;
- a) An economic objective
 - b) A social objective
 - c) An environmental objective
- 3.2 The NPPF confirms at paragraph 11 that plans and decisions should apply a presumption in favour of sustainable development. For plan making this means;
- a) Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.*
- 3.3 Chapter 3 of the NPPF discusses Plan- making and confirms at paragraph 15 that plans should;
- a) Be prepared with the objective of contributing to the achievement of sustainable development*
 - b) Be prepared positively, in a way that is aspirational but deliverable*
 - c) Be shaped by early proportionate and effective engagement between plan makers and communities, local organisations, businesses infrastructure providers and operators and statutory consultees.*
- 3.4 Paragraph 17 of the NPPF requires Development Plans to set growth strategies that meet the strategic requirements of the Plan's area. Paragraph 59 of the NPPF sets a requirement for planning authorities to significantly boost the supply of homes. Paragraph 60 goes on to refer to note the standard method of housing need assessment.
- 3.5 Emphasis is placed upon the need to support the Government's objective of significantly boosting the supply of homes. Paragraph 59 confirms that it is important that a sufficient amount and variety of land can come forward where it is needed.
- 3.6 Furthermore, at paragraph 122, the NPPF is clear that planning policies should support development that makes efficient and effective use of land.

Stroud District Local Plan November 2015

- 3.6 Core Policy CP2 specifically refers to strategic growth and new development locations, seeking to concentrate most of the District's new growth at a series of targeted key locations. Nailsworth is identified as a Local Service centre and as such a Second Tier Settlement suitable to accommodate growth.
- 3.7 It is therefore evident that Nailsworth is identified within the operative LP as a sustainable settlement and one which is capable of accommodating new housing development.
- 3.8 The key housing policies are discussed in Chapter 4 of the LP. Policy CP7 sets out how new development will be expected to contribute towards meeting the needs of all sections of the community.
- 3.9 The subject site is currently identified on the proposals map as a protected outdoor play space.

Nailsworth Town Council, Neighbourhood Development Plan

- 3.10 There is no adopted Neighbourhood Development Plan (NP) for Nailsworth.

4.0 PROPOSED AMENDMENTS TO THE WORDING OF PS06

- 4.1 Site PS06 has been identified in the LPR as a site for potential development for housing and community use. It can be concluded from the above that the use of this site for housing, would comply with all layers of planning policy including the NPPF and LP.
- 4.2 The use of the site for residential use is supported by Ecotricity. However, it is contended that the community use should be omitted and that a better and more effective use of the site should be made to meet local housing need. This is said considering the duty placed upon the Council to significantly boost the supply of new homes and the expected increase in the housing numbers that will be required within the *Submission* draft of the emerging Local Plan. It is self-evident that any increase in the Plan's housing requirement will require the identification of additional greenfield sites or an increase in housing densities on allocated sites. Through good design, an increase from 80 to at least 100 dwellings can be achieved at New Lawn without compromising Ecotricity's vision for an innovative development of low carbon and sustainable homes. Equally, mindful of the brownfield nature of the site, increasing the density from 80 to least 100 dwellings, and removing a requirement for community uses, will undoubtedly increase the viability of the site to ensure the delivery of affordable homes in line with the emerging Local Plan's policies.
- 4.3 In terms of the methodology for assessing the local housing need assessment, while the LPA's calculation within the LPR of 638 dwellings per annum appears mathematically correct¹, the LPA is reminded that the figure comprises only a minimum starting point. Ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs are all additional to the local housing need figure. Equally, the LPA is reminded of Government's objective of significantly boosting the supply of homes. Furthermore, there is a national expectation that future ONS projections and subsequent revisions to the National Index of Local Housing need will result in an increase in the housing requirement for the District.
- 4.4 The provision of just 80 dwellings at this 2.8ha site represents an inefficient use of this brownfield resource. The allocation should be amended to enable the provision of at least 100 dwellings, which in turn will help assist in the securing of the above noted objectives.
- 4.5 In consideration of the above point, it is contended that an additional "community use" at this location is not required given the close proximity of the site to Nailsworth which has a number of community facilities including the Arkell Community Centre Facility which is located approx. 1000 metres to the east. Other community facilities include the following;

- Town Hall, Main Hall, Stage and Kitchen - capacity 150

¹ Based on the 'Standard Methodology' advocated within the Framework; using the ONS 2014 projections and National Index of Local Housing Need.

- Library/Mortimer Room and Kitchen - capacity 50
- KGV Football Pitch
- Nailsworth Subscription rooms
- Nailsworth Recreation centre

4.6 There is also a wide range of places of worship within the town. Equally, there is no evidence base to suggest the need for additional community space/land uses at Nailsworth.

4.7 As such, it is submitted that the wording of PS06 should be revised to read;

PS06 The New Lawn, Nailsworth: Up to 100 dwellings – subject to relocation of football ground

5.0 CONCLUSION

- 5.1 On behalf of Ecotricity, this representation seeks to support the potential site for development identified within the ELR as site PS06 for residential use. The site represents a sustainable location. The importance of providing additional sites for residential use at sustainable locations is identified at national and local planning policy level.
- 5.2 However, it is contended that there is no evidence base to support the need for additional community facilities at this location. The location is served by a number of facilities which are located in close proximity. As such, it is concluded that the site should be used solely for residential use. Additionally, it is contended that an allocation of just 80 dwellings on this 2.8ha brownfield site represents a significant inefficient use of the site. An increase to 100 homes will better help achieve the the LPA's objectives of supporting economic growth, delivering affordable housing and meeting unmet housing needs. Equally, that increase in housing density will help assist in meeting the Government's objective of significantly boosting the supply of new homes.



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