

Stroud Local Plan Review Emerging Strategy Paper November 2018

Land north of Nymphsfield Road, Nailsworth

Prepared by Black Box Planning
on behalf of Freeman Homes





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1. Introduction

- 1.1. These representations to the Stroud Local Plan Review 'Emerging Strategy' consultation paper (November 2018) have been prepared by Black Box Planning on behalf of Freeman Homes. The representations have regard to Freeman Homes' land interest at land north of Nympsfield Road, Nailsworth (site reference PS07). A site location plan is attached at **Appendix 1**.

- 1.2. Freeman Homes welcome and support the preparation of the Stroud Local Plan Review and the expedient manner in which the District Council is conducting the review, following the adoption of the Stroud Local Plan in November 2015.

- 1.3. Freeman Homes support the identification of land north of Nympsfield Road/Nortonwood Junction for housing development within the Emerging Strategy consultation paper. As confirmed by these representations the site is suitable, available and deliverable for residential development. The site is free of any technical constraints that would restrict, limit or hinder the delivery of residential development on the site. The proposed allocation for the site is 25 dwellings. However, initial assessments of the site suggest its capacity is closer to 40 dwellings, and therefore the allocation should be revised as 'up to 40 dwellings' or 'approximately 40 dwellings'.

- 1.4. These representations comment with reference to the relevant consultation questions set out in the Emerging Strategy Consultation Paper. Throughout these representations, regard is had to the plan making policy of NPPF, including the application of the tests of soundness for the plan to be positively prepared, justified, effective and consistent with national policy.

2. Policy Representations (Consultation Questions)

Question 1.0a Have we identified the top 5 issues for you?

- 2.1. The identification of housing development as Issue 1 for the plan to address is supported, as it seeks to ensure housing is located where it can be supported by services and infrastructure to create sustainable development. The identification of Nailsworth as a Tier 2 settlement where some residential development growth can be allocated in a sustainable manner in accordance with Issue 1 is supported.

Question 1.0b Do you agree with the ways we intend to tackle them?

- 2.2. The identified ways to tackle the issues are generally supported, however it is not obvious that these are clearly reflected in the Preferred Strategy growth allocations. Development sites within or adjacent to existing settlements with appropriate provision of existing services and amenities should be maximised to help boost housing delivery.

Question 2.3a Do you agree with the ways in which the emerging Strategy intends to meet local housing need?

- 2.3. Freeman Homes generally support the approach taken to assessing the housing requirement, in so far as the calculation is based on the standard methodology set out Government's national planning guidance. The proposed minimum number of homes needed over the plan period at 638 dwellings per annum is therefore supported, but the preferred strategy should be reflective that this is the minimum requirement. The plan should be positively prepared and the opportunity to promote growth above and beyond the minimum requirement in the plan would bolster housing delivery across the plan period, thereby helping to ensure development control decisions are locally made and plan led.
- 2.4. Regarding self-build plots, it is not appropriate or realistic to seek to allocate a proportion of self-build on allocated sites under the control of house buildings. Such development sites will either require a degree of conformity within an approved design code, or will set a design precedent by virtue of the housing developer house types/product, and therefore these sites do not provide realistic or desired context for aspiring self-build homeowners. Self-build plots should only be sought on smaller scale bespoke allocations for entirely self-build plots.

Question 2.3b Do you support an alternative approach or have we missed anything?

- 2.5.** Paragraph 59 of NPPF (July 2018) requires the planning system to significantly boost the supply of homes, so a housing growth target above and beyond the minimum requirement would provide a degree of boost as sought by Government. Further allocations beyond the minimum requirement would also provide flexibility in strategic policies in order to enhance prospects of housing delivery at a rate which maintains a robust 5-year housing land supply over the plan period.

Question 3.2a Do you agree with the Strategic Objectives as drafted?

- 2.6.** The housing element of Strategic Objective S01 should be more aspirational. The wording 'decent housing' gives the impression of mediocrity rather than higher standards of urban design, masterplanning, architecture and living space which the local planning authority should be seeking. Moreover, it is suggested the strategic objective should be to deliver quality homes to meet the full needs of the District and neighbouring authorities where appropriate.
- 2.7.** Strategic Objective SO4 relating to transport and travel is supported, but it is questioned whether this objective is best achieved with the strategic allocations identified in the Emerging Strategy. Are the proposed strategic allocations best positioned to provide homes near employment opportunities, shops, medical and other critical services, education and other amenities?

Question 4.2a Do you support the broad approach of the emerging growth strategy in terms of distributing the growth required by national policy for Stroud District

- 2.8. At the outset of the Emerging Strategy, Key Issue 1 is identified as ensuring housing development is located in the right place and supported by the right services and infrastructure to create sustainable development. On page 7 of the consultation paper, it is stated that Key Issue 1 is addressed by ensuring new housing development is concentrated in locations with best access to services, facilities, jobs and infrastructure. Taking this issue into account, and dovetailing it with Strategic Objective SO4 to promote sustainable travel patterns, it is not clear how the emerging strategy distribution of growth. Rather, opportunities for development growth within or adjacent to established settlements with good service provision, such as the proposed allocation at land north of Nympsfield Road in Nailsworth, should be maximised and be sequentially preferable to isolated strategic allocations or allocations requiring substantial infrastructure investment.

Question 4.2c Have we identified the right towns and villages for growth?

- 2.9. The identification of Nailsworth as a sustainable Tier 2 settlement to accommodate some development growth is supported. Nailsworth benefits from a thriving town centre with numerous shops and services. Located on the urban edge of Nailsworth, land north of Nympsfield Road/Nortonwood Junction (site reference PS07) is entirely sustainable for housing development. As indicated in the introduction of these representations, the site capacity is however circa 40 dwellings, so the proposed allocation should reflect this.

Question 4.3a Are any settlements in the wrong tier?

- 2.10. The identification of Nailsworth in Tier 2 is supported. The town benefits from extensive provision of local amenities and is a sustainable location for appropriate levels of development growth to be allocated in the Stroud Local Plan Review.

Question 5.0a Do you support the proposed mini-vision for your area (s)?

- 2.11. The identification of land north of Nympsfield Road/Nortonwood Junction (site reference PS07) for residential development within the Nailsworth mini-vision is entirely supported. Freeman Homes propose to deliver the site with a quality housing development following a planning application in due course, which will be submitted at an appropriate stage as the local plan review advances.