

**From:** Town Clerk [clerk@nailsworthtowncouncil.gov.uk]  
**Sent:** 19 December 2018 15:52  
**To:** \_WEB\_Local Plan  
**Subject:** RE: Stroud District Local Plan Review: Emerging Strategy Public Consultation - Additional parish council consultation

Hello,

I've tried to fill in the online consultation but this timed out and I can't get in again now. Please find below Nailsworth Town Council's response to the Local Plan Review, Emerging Strategy Paper.

Numbering follows that of the Emerging Strategy Paper.

[https://www.stroud.gov.uk/media/970666/emerging-strategy-paper\\_final\\_low-res\\_8-11-18.pdf](https://www.stroud.gov.uk/media/970666/emerging-strategy-paper_final_low-res_8-11-18.pdf)

Locality and site specific responses are made for Nailsworth only.

#### **1.0a. Top 5 Issues**

We agree that the issues identified are important. However, there is a very strong focus on housing development (#1, #3, #5), with comparatively little said about encouraging and generating economic activity, and no mention of how accessibility can be maintained and improved whilst reducing reliance on petrol and diesel transport.

Whilst housing is clearly important, and pressures from central government are understood, there is an imbalance in how issues are defined.

#### **1.0b Tackling Issues.**

Issue #2 and #4 should be re-worded to emphasise the important of retaining exiting green space within towns, which may include gardens and small plots. E.g. Issue #4, first bullet: change to "safeguarding local wildlife-rich habitats and wider ecological networks / areas *within settlements and in the countryside* "

Expansion of the AONB would be an effective means of promoting safeguarding of green space on the edge of Nailsworth (and other settlements).

Farm diversification must be very carefully managed so as not to create out of town retail or service centres that could damage town centres. In some places 'garden centres' and 'farm shops' have developed into what are effectively out of town shopping malls with food courts. This should not be permitted in the guise of farm diversification.

Issue #3. Whilst maximising potential of brownfield land for development is correct, the importance of maintaining sufficient employment sites should be acknowledged.

Issue #5. The aim should be to *maximise* the number of affordable homes in developments of 10 dwellings or above (not 'ensure a proportion').

Rural exception sites and exception sites for first time buyers can create major loopholes in planning policies that will be exploited by developers. Exception sites should be *discouraged* not 'encouraged'.

#### **2.1a Local Economy: approach**

We broadly agree with the proposals.

'Faster roll out of broadband' should specify this must be for *much higher speed* broadband. South Korea is currently offering a network with broadband speeds of 1Gbit/s (1,024 Mbit/s). Current 'fast' speeds in our area of 50 Mbit/s will be woefully inadequate early in the plan period.

### **2.1 b Local Economy: Omissions**

The need to maintain local employment sites must be made explicit – since there will be constant pressures to use sites for housing development which can provide much more profitable returns.

The role of town centres as employment generators must be made explicit and prioritised..

### **2.2 a Town Centres**

We generally welcome the proposals for town centres, and the specific proposals for Nailsworth.

Whilst Nailsworth town centre has performed well, the proliferation of retail discounters comparatively nearby is a threat, and the continued growth of on-line shopping creates risk to the success of bricks and mortar convenience shopping generally. We support continuing our town centre's development as a highly distinctive shopping, leisure and service centre that offers an enjoyable experience to local people and to visitors.

Our town centre is the most important employment site in Nailsworth. Maintaining and enhancing this role, including through retail, leisure, small-scale office, and co-working sites is a high priority for the Town Council.

We welcome the support for redevelopment in the town square / Old Market area, and the benefits this can bring to retail and leisure experiences, improved open space, and new smaller non-family housing for younger and older people. The Town Council has a longstanding aspiration to improve the design quality and functioning of the Old Market area, along with Market Street improvements (including pedestrian priority).

We would welcome detailed discussion with SDC to develop a long term plan for the town centre and explore the possibilities of development that would improve the retail and leisure offer; improve public open space, the public realm and access to water; add to the residential stock, particularly in the Town Square area; and deal with the omissions identified in 2.2b, below.

The move of NTC's offices and services to the Library / Mortimer room building adds to the opportunities

### **2.2 b. Town Centres - Missing elements**

Design quality is an essential element of an attractive experience for visitors and shoppers. A clear and effectively enforced policy on design in the town centre is needed, particularly on signage, shop fronts and piecemeal alteration to existing buildings. A long-term plan for better and consistent street furniture, paving and surfacing would bring about gradual improvement.

Free parking is integral to the town centre's success and must be maintained.

The creation of an effective 20 mph zone in the town would substantially enhance its attractions for local people and visitors.

### **2.3 a. Local Housing Need**

We agree with the overall approach, apart from the treatment of ‘exception sites’. Rural exception sites and exception sites for first time buyers create major loopholes in planning policies that will be exploited by developers. Exception sites should be *discouraged*.

We make specific comments about housing in Nailsworth at section 5 below.

#### **2.4 a. Local green spaces and community facilities.**

We agree with the overall approach. We strongly support protection for all existing green and open spaces within settlements. In addition to their value for recreation, they are essential to Nailsworth’s setting; reflect its heritage as a series of small settlements and hamlets; help create its distinctive character, important to residents and visitors alike; and are highly valued by local people. (The proposed development at Pike Lane attracted fierce local opposition, including almost 1,000 individual written objections).

#### **2.4 b. Green Spaces – omissions.**

Extension of the AONB would be an effective means to enhance protection of green and open spaces.

#### **3.1 a., b. Vision for the Future**

This inevitably broad-brush description is a good attempt at capturing a vision for the future.

The very obvious omission is anything about how we actually get around. Difficult as it is, without some reference to future transport this is a very partial vision.

#### **3.2 a., b. Strategic Objectives**

We cannot take exception to these very broad strategic objectives.

However it is not clear how they relate to other elements of the strategy. For example, the protection of green space does not seem to be encompassed. SO4 deals with transport and travel – but this topic has had little prior discussion.

The way in which strategic objectives are derived from and link to other elements of the strategy should be made much clearer.

### **Emerging Growth Strategy**

#### **4.2 a Broad approach**

We agree that concentrating housing growth in Cam and Dursley, Stonehouse and Stroud, with new settlements at Sharpness and Wisloe is the best approach. Future additional growth at Sharpness and Wisloe would allow enhanced facilities in those new communities.

We strongly agree that only modest levels of growth should take place in Nailsworth, and that any development should be used ‘to overcome existing infrastructure deficiencies and to deliver enhancements to places’ (p34). It is absolutely essential that mechanisms are put in place to ensure such enhancements are delivered from any development.

There is no scope for reserve sites in Nailsworth

### **Settlement hierarchy**

4.3a. We agree that Nailsworth is a Tier 2 settlement.

4.3 b Tier 4 and 5 settlements should be included in the hierarchy. Though small they are settlements, not open countryside, and should be treated as such.

4.3 c Cumulative impacts should be managed. This is best achieved through strict definition of sites that are suitable for development – and those that are not; very clear settlement boundaries; and strict policies to limit infill development, especially in large gardens and open spaces within the settlement.

### **Settlement development limits**

4.4 a. It is absolutely essential that clearly defined settlement development limits are maintained and strictly enforced. Any move to ‘criteria based’ approaches is an invitation to speculative development that will result in unrelenting pressure for development on green spaces on the edge of towns. It is our strong view that settlement development limits must be maintained.

4.4 c. We strongly oppose any development beyond settlement development limits.

4.4 e. f. The Strategy proposes not to change to Nailsworth’s settlement development limits. We agree. No change is required or wanted.

### **Making Places:**

#### **5.0 Stroud valleys mini-vision**

We broadly support this mini-vision, and the references to Nailsworth.

However the wording on Nailsworth should be amended to read “ ... providing for its own resident community ...” (deleting ‘growing’) to emphasise the very limited scope for development in the town, as acknowledged elsewhere in the Strategy.

#### **5.1 a. Potential Sites and Alternatives: Nailsworth**

##### **Settlement role and function**

##### **Planning constraints and designations.**

We agree, but wish to see settlement development limits strictly enforced, and an extension of the AONB to more fully protect green spaces at the edge of the town.

##### **Landscape sensitivity**

This should read ‘preferred direction of housing growth ... is to the *northwest*’. Stating that west is a preferred direction of growth gives support to future attempts at speculative development in the Newmarket valley, west of the Pike Lane site.

##### **Settlement Role and Function**

We agree with this description / analysis.

Note however that Nailsworth no longer has a bank (although there is a building society).

##### **Potential sites for development**

### **PS06 New Lawn**

This site has been added since previous consultation – a reasonable response since the owners are seeking planning permission for development.

The development is very large for the town, and if it goes ahead an area that was originally public open space will become a dense development, removing the private open space of a soccer ground and a community facility – the gym – whilst generating substantial profits for the landowner. Nailsworth Town Council strongly believes that the people of the town, and of Forest Green in particular, should enjoy a large share of this windfall in the form of improvements to the area. Any development here and on the adjacent PS07 site, must include substantial measures ‘to overcome existing infrastructure deficiencies and to deliver enhancements to places’ (Emerging Strategy, p34).

We are keen to see imaginative proposals to improve access to the town centre from Forest Green for those without cars and to create opportunities for improved services and employment opportunities in the Forest Green area. Development on this and the adjacent site should include provision for open space, perhaps including allotments, and for business uses e.g. convenience store, medical treatment room, pharmacy, live/work units. Development will require upgraded infrastructure to provide access and cope with traffic growth. Development must be coordinated and harmonised with PS07

### **PS07 North of Nympsfield Road**

This site is contiguous with PS06, and the development of the two sites must be coordinated, as above. Development on this site should contribute to the enhancement of Forest Green as set out above.

### **PS08 North of Avening Road.**

We agree that this should remain a garden centre or employment site.

### **Alternative sites**

We strongly agree that all blue lined sites were rightly rejected in the appraisal and are unsuitable for development. There are no additional suitable development sites within the settlement development limits or outside them.

## **Background Studies**

### **6.1 Other Local Studies**

We are perhaps on the threshold of a major transport revolution, with the possibility of smart vehicles becoming ubiquitous well before 2040. The transport strategy work should encompass these perhaps radical and rapid changes.

Extensions to the AONB would be welcome and supporting studies would help.

Kind regards



Town Clerk

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**From:** Local.Plan@stroud.gov.uk <Local.Plan@stroud.gov.uk>

**Sent:** 30 November 2018 12:06

**To:** PARISH.COUNCILS@stroud.gov.uk

**Cc:** MEMBERS@stroud.gov.uk

**Subject:** RE: Stroud District Local Plan Review: Emerging Strategy Public Consultation - Additional parish council consultation

Dear Parish Council Clerk,

**Stroud District Local Plan Review: Emerging Strategy public consultation – Additional parish council consultation**

A couple of weeks ago we wrote to you to let you know about the public consultation on the Local Plan Review. Please see the email below and list of exhibitions attached for more details.

We are emailing you again to draw your attention in particular to the proposals contained within the Emerging Strategy paper to allow for limited development of new homes outside of settlement development limits at smaller settlements\*.

The specific proposal in the consultation is to amend the Local Plan to allow at Tier 4 and 5 settlements\*, in addition to rural exception sites, the development of small sites of up to 10 dwellings outside settlement development limits in the interests of maintaining social sustainability, provided that the policy is supported by the local community through the making of a neighbourhood plan.

The thinking behind the proposal is that a small number of new market houses (including 30% affordable housing if sites can accommodate 6 -10 market houses) can help to maintain local rural communities and offer the potential for family members to buy or rent homes to maintain their local connections. The requirement for the preparation of a neighbourhood plan before any planning application could be considered favourably ensures that there is public support for such a proposal because in order to have a neighbourhood plan approved, it has to be subject to a local referendum within the parish.

During the preparation of the Emerging Strategy, District councillors suggested that some parish councils representing small villages may be prepared to support a small number of new homes outside settlement development limits but were unlikely to want to prepare neighbourhood plans because of the resources and time required to prepare them. **As part of this consultation, therefore, we would particularly like to hear from any parish council which would support some limited development at smaller settlements\* but does not intend to prepare a neighbourhood plan.** If we receive clear support from these parish councils we will consider listing these villages within the draft Local Plan as locations where some limited new homes may be acceptable (subject to meeting design and environmental criteria) without the need for the preparation of a neighbourhood plan. This would then be subject to public consultation across the District next year.

\*Smaller settlements (identified as tiers 4 and 5 in current Local Plan) are listed below:

Arlingham, Box, Brookthorpe, Bussage, Cambridge, Cranham, Eastcombe, France Lynch, Haresfield, Hillesley, Longney, Middleyard, Newport, Nymphsfield, Randwick, Saul, Selsley, Sheepscombe, South Woodchester, Stinchcombe, Stone, Thrupp

As this specific option for parish councils is not raised in the consultation document or in the online survey, and for the avoidance of doubt, we would be grateful if any parish council which may want to support some development at smaller settlements within their parish but does not intend to prepare a neighbourhood plan

would email us during or shortly after the consultation period. We would then be very happy to meet with that parish council after the end of the consultation period to discuss how we could progress this policy initiative. If your parish council does not support this idea you do not need to respond to this email. This is a specific “opt-in” option for parish councils who do see potential in this idea.

If you have any questions please email us and we would be very happy to discuss matters with you.

**Planning Strategy Team  
Stroud District Council**



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**From:** \_WEB\_Local Plan  
**Sent:** 16 November 2018 15:15  
**To:** \_DL\_PARISH/TOWN CLERKS  
**Subject:** Stroud District Local Plan Review: Emerging Strategy Public Consultation

Dear Town/Parish Council Clerk,

**Stroud District Local Plan Review: Emerging Strategy Public Consultation**

The Stroud District Local Plan was adopted in November 2015 and sets out a planning strategy for distributing development within the District and policies for protecting and conserving the natural and built environment. The current Plan covers the period to 2031.

The District Council started the process of reviewing the current Local Plan in 2017 to cover the period to 2040. It is important that the Local Plan is kept up-to-date and the current Local Plan commits the Council to undertake an early review. This consultation paper sets out the Council's emerging strategy for meeting development needs over the next 20 years but also highlights other options.

The public consultation on the emerging strategy will run for 9 weeks from **16 November 2018 to 18 January 2019**.

You will receive a hard copy of the emerging Strategy paper in the post. It is available to view and download at [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview). Hard copies of the documentation will also be available at the following locations:

- Town and parish council offices that open to the public: Berkeley, Cainscross, Cam, Chalford, Dursley, Minchinhampton, Nailsworth, Painswick, Rodborough, Stonehouse, Stroud, Upton St Leonards, Wotton-under-Edge
- Public libraries at Berkeley, Brockworth, Dursley, Nailsworth, Minchinhampton, Miserden, Quedgeley, Stonehouse, Stroud, Wotton-under-Edge
- Stroud District Council, Ebley Mill reception There are computers for public internet access here as well.
- The Tourist Information Centre at the Subscription Rooms, Stroud

We are holding public exhibitions around the District during the consultation period. This will provide an opportunity to chat to officers working on the Local Plan review. A copy of an A5 flyer is attached. Hard copies are in the post. Time and venue details can be found on the webpage [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

We would also like to give you advance notice of a Town and Parish Councils conference, scheduled for **8 January 2019** between 2pm and 5pm in the Sub Rooms, Stroud. Further information on this event will follow shortly.

We will also be contacting you shortly on the specific issue of whether your council would support limited additional development beyond settlement development limits.

Further information on the Local Plan Review and the consultation is available to view via [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

To respond to the consultation, we would prefer you to complete the online survey available on the Local Plan Review webpage. Alternatively, you can email your response to [local.plan@stroud.gov.uk](mailto:local.plan@stroud.gov.uk) or by post to **Local Plan Review, The Planning Strategy Team, Stroud District Council, Ebley Mill, Westward Road, Stroud, GL5 4UB**. Please respond by **18th January 2019**.

**Planning Strategy Team  
Stroud District Council**



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