

SHF/CIR.P19-0133

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18<sup>th</sup> January 2019

Local Plan Review  
The Planning Strategy Team  
Stroud District Council  
Ebley Mill  
Stroud GL5 4UB

Dear Sir

**Stroud District Local Plan Review - Emerging Strategy Consultation - Land adjacent to Lower Newmarket Road, Nailsworth (SALA site ref NAI007)**

Pegasus Group have been instructed by Highland Estates to submit representations to the above consultation in respect of land adjacent to Lower Newmarket Road, Nailsworth (SALA 2017 site ref: NAI007).

The representations respond to the questions as set out in the Emerging Strategy document in respect of the shaping the future of the Stroud Valleys.

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

Pegasus Group on the behalf of Highland Estates generally supports the proposed mini-vision for the future of the Stroud Valleys.

It is noted that:

***"Nailsworth town will play a supporting role: providing for its own growing community, but also drawing from a wider local catchment and attracting visitors from outside the District."***

Pegasus Group would like to further emphasize the importance of suitable housing being identified as an element needed to provide for its own growing community, as already mentioned in the mini- vision.

**Question 5.0b - Would you like to propose alternative wording? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to.**

No comments.

**Question 5.0c - Do you support the identified key issues and priorities for action for your area(s)?**

Pegasus Group supports the identified key issues and priorities for action for the Stroud Valleys. Pegasus Group would like to highlight the importance of acknowledging the

promotion of housing development in the area in order to create a sustainable place to live and work.

**Question 5.0d - Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).**

The emerging growth strategy for the district currently proposes at least 12,800 additional dwellings to meet needs for the next 20 years. The delivery of the emerging growth strategy is to be achieved partly through the development of the potential sites identified in the Emerging Strategy Paper.

**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)**

The Strategic Assessment of Land Availability 2017 provides a detailed analysis of the land adjacent to Lower Newmarket Road, Nailsworth (site ref NAI007). The document identifies a brownfield land of a gross site area of 0.14ha. The site has an identifiable net developable area of 0.13ha and a capacity to accommodate 4 residential units. Currently the land is unused, adjoining settlement boundaries and is outside the Conservation Area. The area is primarily residential, with a number of new dwellings delivered in close proximity to the site. The site is not within an area at risk of flooding (ie. it is not in Flood Zones 2 or 3). The site assessment suitability physical constraints sections identify no ground contamination across the site. The only issue identified in the document is potential land stability issue. The information is unsubstantiated as it is not based on any expert assessment and would require further investigation. In any event it has not rendered adjacent land undevelopable.

The potential impact summary section of the report states that the site has a potential to be developed without any harm to any designated heritage assets and no impact on any designated natural environment site. Furthermore, even though the site is located within a larger land parcel identified in the Landscape Sensitivity Assessment as medium sensitivity to housing and high sensitivity to employment uses, the site is a vacant plot of a brownfield land situated along the Lower Newmarket Road. The site constitutes a gap in-between the existing residential infrastructure. Therefore, subject to high quality design, it is argued that the potential residential development would only constitute an infill into the existing built up area with minimal impact on the local landscape. The document states that:

***"the area's sensitivity lies in its steep valley sides which are relatively open, highly visible and form a coherent green corridor from the wider countryside of the AONB into the settlement form. The only potential housing development opportunity is for a single line of 3-4 high quality houses south of Lower Newmarket Road at its eastern end."***

The overall conclusion around the suitability of the site states the following:

***"Although not currently policy compliant, the site has no overriding physical constraints or potential impacts preventing housing development".***

Achievability summary indicates that there is a reasonable prospect of the development, with the site being economically viable and the capacity of the developer to complete and sell the properties in the timeframe expected in the area is good.

Crucially, the site is a brownfield land and residential development on this parcel would support the key objectives of the National Planning Policy Framework. The NPPF 2018 chapter 11 "Making effective use of land" paragraph 117 states the following:

***"Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously- developed or 'brownfield' Land."***

Furthermore, NPPF paragraph 118-point C states planning policies and decisions should:

***"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land".***

Pegasus Group, on behalf of our client would like to highlight the fact that the site identified in the Strategic Assessment of Land Availability 2017 does not constitute the housing supply list identified in the Sustainability Appraisal Report for the Stroud District Local Plan Review November 2018 that accompanies Stroud District Local Plan Review Emerging Strategy Paper November 2018.

Pegasus Group would like to highlight the suitability of the site for residential development and would like to see more emphasis being put on the site in the Stroud District Local Plan Review Emerging Strategy Paper November 2018. The proposed site is a brownfield land adjacent to Lower Newmarket Road and would constitute a natural built up infill into the existing residential infrastructure along the road. The proposal would contribute towards achieving the Emerging Growth Strategy housing goals and reduce the housing pressures in the area. The above evidence suggests limited/no harm to heritage assets, biodiversity and geodiversity and therefore, the site could be delivered without any harm to a designated natural environment site.

Our overall conclusion and recommendation is that the site should be formally allocated for housing. If the site is deemed too small for allocation, then the settlement boundary should be amended to include the site so that it can come forward as a policy compliant windfall site within the built-up area.

We would like to remain on the consultation database and receive future correspondence as the Local Plan review progresses.

If you have any queries in respect of the response, please do not hesitate to contact me.

Yours faithfully

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**Regional Director**  
Email: