

Stroud District Local Plan Review: Draft Plan November 2019

Nailsworth Town Council response 22.01.20

Numbering follows the draft plan

We broadly agree with the issues identified, and comment when we have concerns. Locality and site specific responses are made for Nailsworth only.

Development Strategy

We broadly agree with the strategy, and its emphasis on focusing growth in locations with the best infrastructure, including new settlements at Sharpness and Wisloe. (2.3)

We welcome the statement that housing development at Nailsworth should be focused on meeting local needs (2.23) and will be modest (2.48).

We have concerns about rural exception sites and exception sites for first time buyers as these can create major loopholes in planning policies that will then be exploited by developers. Exception sites should generally be *discouraged* not 'encouraged'. Sites should be allocated on the basis that they are suitable for development. Provision of land, including SDC owned land, to Community Land Trusts provides a means of ensuring that affordable housing is provided for local people

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. It is not clear that DP E15 protects against this.

We agree that Nailsworth has 'the potential to increase market share of convenience goods floorspace' (2.65). Nailsworth town centre has performed well, but 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.

Whilst ‘qualitative improvements to the retail offer’ (2.65) will help achieve that, such improvements in turn are linked to such planning matters as improvements to the environment and quality of the public realm. And the first policy principle should be to do no harm. It is extremely disappointing that SDC recently chose to permit the out of town development including a new football stadium at a motorway junction, that amongst other things will have the effect of damaging the viability and vitality of Nailsworth town centre as a consequence of the loss of the FGR football club, and the spend it generates. We clearly evidenced this in our comments on the application. Compensating improvements to make the town more attractive to shoppers and visitors will be required to counter that damage before the town can begin to increase its market share.

We support proposed improvements to Nailsworth town centre (2.68) but:

- 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 to the public realm.
- Free parking is integral to the town centre’s success and must be maintained, until substantial improvement in public transport and walking and cycling provision have been achieved.
- Indication of how we can move to implementation of proposals (e.g. redevelopment of town square) is needed. The brief section on Delivery (8) does not provide this.

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 including improvements to design quality, and to explore the possibilities of development that would improve the retail and leisure offer; improve public open space, the public realm and access to water; and add to the residential stock, particularly in the Town Square area.

DCP1 Carbon neutrality. We support this aspiration but would find it more plausible had the District Council not recently granted planning permission for a car based, out of town “eco-park” at a motorway junction. The notion that this will “discourage the use of the private car” is absurd.

CP3 We agree Nailsworth is a Tier 2 settlement.

3 Making Places

Nailsworth

Landscape sensitivity

This should read ‘preferred direction of housing growth ... is to the *northwest*’. This is consistent with proposed development sites at Forest Green. 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). We pointed this out in previous consultation.

Development Strategy

We agree that minor infill and redevelopment should be permitted within the settlement development limits (SDL). However this should be limited and avoid development in gardens or small open spaces that will cumulatively change the character of the town, and increases to vehicular traffic on narrow lanes, which would be counter to the aspiration to increase walking and cycling.

It is our strong view that settlement development limits (SDL) must be maintained and strictly enforced. Permitting “suitable development adjacent to settlement limits” is an invitation to speculative development, and describing this as “exceptional” does not help. Policies HC3 and HC4 open the door to development outside SDL, and will encourage further speculative applications.

Policy HC1, even including HC1, (3), seems unlikely to prevent this. Permission was granted on appeal for the speculative development at Pike Lane, Nailsworth, when LP policy on development of green field sites at the edge of the settlement was insufficiently robust to provide protection. We fear that current policies will encourage similar developments, and strongly oppose policies that permit development outside SDL in Nailsworth.

We agree that P506 (assuming the football club moves) and PS07 are development sites.

The combined development is very large for the town (105 dwellings), and if it goes ahead, an area that was originally public open space (PS06 New Lawn) and is currently greenfield (PS07) will become a dense development. Development of PS06 will remove 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.

These sites should be treated as a major development, and we strongly support creation of development briefs and detailed criteria; the Town Council expects to be fully involved in their creation.

Infrastructure and other requirements for these two sites offer opportunities for much improved connections between Forest Green and the town centre through imaginative and substantial measures to improve public transport and cycling. Improving non-car access from Forest Green to the town centre is in line with CP13 (2) and is necessary to achieve DCP2, Supporting Older People; CP7 Lifetime Communities; and CP8(2) New Housing Development. By encouraging use of the town centre it will help achieve CP12 (B), Town Centres and Retailing. However, provision for increased car traffic may still be required

There are also opportunities for improved services and employment in the Forest Green area. Development on these sites should include provision for open space, perhaps including allotments, and for business uses e.g. convenience store, medical treatment room, pharmacy, live/work units.

There is an opportunity here for an exemplary scheme that demonstrates how new development can respond to the climate emergency in its own design and planning, and through improving the neighbourhood in which it is located. This is a rare opportunity for the town and should not be wasted. Nailsworth Town Council will work with SDC to achieve this.

5 Economy and Infrastructure

We broadly support CP12, Town Centre and retailing.

We agree that EK 22, 23, and 24 are the key employment sites in Nailsworth. However, employment use should normally be retained at other sites where it currently exists.

We support a Sustainable Transport strategy. However DPI1 Mode Specific Strategies proposes very specific and implementable measures to use parking restrictions to discourage car trips whilst offering much less in the way of specific and achievable alternative provision. The proviso in DPI1 that car trips should be discouraged only “where viable sustainable alternatives exist” is fundamental, and must inform parking policy. Otherwise, reduced parking spaces or charges for parking in Nailsworth will simply reduce footfall and spend, and thus town centre viability. It cannot be stressed too strongly that ample free parking is available at nearby out of town supermarkets, including those for which SDC recently granted planning consent.

If the opportunities for substantially improved public and cycle transport presented by development at Forest Green are taken, it may be possible to reduce car use.

6 Our environment and surroundings

We generally support the Core Policies and Delivery Policies. We strongly support Delivery policy ES7 Landscape Character. We would welcome extension of the AONB around Nailsworth to provide added protection for remaining green spaces.

We think that small existing green space, which may include gardens and small plots, are essential to the character of our town and should not be lost to development. It is acknowledged at 2.70 that 'there are existing places and spaces valued by the community but not explicitly recognised in existing plans... Local green spaces can be identified for special protection'. However there is no apparent read across to a policy to protect these spaces; there should be.

RAM 23.01.20 / 27.01.20