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Stroud Local Plan Review Emerging Strategy Paper November 2019

Land north of Nympsfield 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 'Draft Plan for Consultation' (November 2019) 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 support the preparation of the Draft Plan following consultation on the Emerging Strategy Paper in November 2018. The progress of the local plan review provides critical guidance for the development sector to make investment decisions which in turn leads to housing delivery to help meet local needs for both market and affordable homes.
- 1.3. Freeman Homes support the allocation (PS07) of land north of Nympsfield Road for housing development within the Draft Plan. Following on from our previous representations to the 'Emerging Strategy' Consultation (November 2018), the site remains available, suitable and deliverable for housing development. From the outset, attention is drawn to an assumed drafting error on the redline site boundary illustrated for allocation policy PS07 (page 72 of the Draft Plan). The natural field boundary abuts the play area adjacent to the northeast corner of the site as illustrated by Appendix 1. The Draft Plan redline shows an arbitrary boundary cutting off the corner of the site. The redline allocation area for PS07 should be corrected accordingly.

1.4. The site is allocated in the Draft Plan for development of up to 25 dwellings. Freeman Homes are in the process of undertaking feasibility testing regarding the site capacity taking into account the landscape sensitivity of the site boundaries, and the requirement for open space and strategic landscaping. At this stage, it is envisaged that the site can comfortably accommodate the draft allocation with scope for more than 25 dwellings whilst retaining strategic landscaping and open space.

1.5. Throughout these representations, consideration is given to national planning policy requirements for plan-making as set out in Chapter 3 of the National Planning Policy Framework (NPPF), including paragraph 35 which stipulates the tests of soundness for examining local plans as follows.

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.6. The representations are also put forward in the context of NPPF Chapter 5, *‘Delivering a sufficient supply of homes’*.

2. Detailed Representations

Chapter 2: Making Places

- 2.1.** The strategic objectives set out in Chapter 2 of the Draft Plan are generally supported. Strategic objective SO5 relates to climate and environmental limits. The overall objective is generally supported by Freeman Homes. However, the Council should seek stakeholder engagement through workshops or other means in order to understand what is required to ensure that the specific objective of '*securing zero carbon development through building design*' is both realistic and attainable. Does this mean that new buildings should be carbon zero in operation, or buildings should be zero carbon throughout the development process including construction for example? The strategic objective needs to be unambiguous in this regard.
- 2.2.** Paragraph 2.27 of the draft plan invites views on deliverability of allocated sites and the potential need for additional reserve sites to be identified should allocation not perform. In this context, the plan should seek to ensure allocations provide for the efficient use of land without comprising design quality or character with overly ambitious densities. Freeman Homes suggest that an increased number of small to medium allocations across the District may yield faster rates of delivery than some ambitious large-scale strategic sites, such as new garden villages, which rely upon burdensome infrastructure leading to substantial delayed delivery. The plan should ensure there is a supply buffer to adopt a realistic position of slow delivery that is likely from the proposed new garden villages.

Housing (2.5)

- 2.3.** Section 2.5 of the Draft Plan sets out the housing requirement for the District up to 2040. The calculation using the Government's standard methodology is supported (638 dwellings per annum = 12,800 dwellings over the 20-year plan period to 2040).
- 2.4.** The plan identifies a residual requirement of 8,000 homes (i.e. requirement less commitments). It is assumed that the Council has applied the definition of deliverable set out in Annex 2 of NPPF and adopted a 'realistic assessment' of delivery trajectories as required by NPPF paragraph 72.

Core Policy DCPO1: Carbon Neutral by 2030

- 2.5.** The principle objective of this policy is supported by Freeman Homes in seeking to address climate change considerations in plan making. The proposed allocation at PS07 is entirely consistent with the criteria set out in the policy in so far as:
- The site will deliver homes in a location which minimises the need to travel including the promotion of self-containment with proportionate levels of new growth at Nailsworth.
 - The proximity of the site to key infrastructure and amenities within Nailsworth presents a realistic opportunity to promote non-car travel including bus, cycle and pedestrian movements.
 - The scheme will provide appropriate levels of green infrastructure including planting and amenity space taking into account the site context.
 - Freeman Homes are always seeking to embrace new technology and adapt new homes accordingly to provide energy efficiency in line with increasing requirements within Building Regulations.

Core Policy CP2: Strategic growth and development locations

- 2.6. The identification of housing allocations totalling 105 new homes at east Nailsworth is supported by Freeman Homes, including the allocation of land north of Nympsfield Road. The role and function of Nailsworth as one of the principal settlements in Stroud District makes it an appropriate location for the allocation of proportionate sustainable growth.

Core Policies DCP2 (Supporting Older People) and CP7 (Lifetime Communities)

- 2.7. These policies require development proposals to increase the available range of housing options, promote active lifestyles and creating living environments which are accessible and cater for all age groups and disabilities including lifetime accommodation.
- 2.8. Freeman Homes promote a mix of housing types and sizes on their development proposals, often including an element of over 55s housing, and support these policy objectives.

Core Policy CP9: Affordable Housing

- 2.9. The policy objective for at least 30% provision of affordable housing across the District is supported by Freeman Homes. However, the policy should also provide some recognition to the NPPF minimum requirement for 10% affordable provision on major development proposals to allow for unforeseen circumstances, such as abnormal construction costs, may lead to site viability being explored. Although there are no known viability concerns with site PS07 at this juncture, some clarification with regards to the degree of flexibility the Council will consider and in what limited circumstances, would provide a more effective policy.

Delivery Policy HC3: Self build and custom build housing provision

- 2.10.** Freeman Homes object to the 2% requirement of dwellings on strategic sites to be provided a self build or custom plots. The Government promotion for custom self build is related to significantly boosting the supply of housing with policy encouragement for as many forms of house building as possible (i.e. in a similar manner to the promotion of smaller sites, NPPF paragraph 68).
- 2.11.** The policy appears to simply transfer the self-build provision to strategic sites with no increase in housing delivery as a result. Self or custom build provision will also hinder delivery of allocated sites with uncertainty over take-up and scheme completion, which are critical elements for development funding and viability for schemes to progress. The requirement will sterilise land within allocations which should be made available for normal housebuilding (market and affordable). There are also practical difficulties for the build programme by seeking to allocate self/custom build plots within a larger residential development.
- 2.12.** The other driver for Government's promotion of self-build plots is to ensure policy provision is made for those wishing to commission their own home. However, such homes are normally bespoke in terms of site selection and design, which is not compatible within a larger residential development scheme or the development briefs required by the draft policy allocations.
- 2.13.** For the reasons above, the policy as drafted is unsound. The requirement for 2% self builds or custom build on allocated strategic sites should be deleted.

Core Policy DHC7: Provision of new open space and building and indoor sports facilities

- 2.14. Freeman Homes reserve the right to comment further on these standards during the Plan's examination following further technical work regarding the masterplanning of land North of Nymphsfield Road.

Delivery Policy EI12: Promoting transport choice and accessibility

- 2.15. The objectives of the policy are generally supported by Freeman. However, the reference parking standards requires an electric vehicle charging point (minimum 7kW and at least Mode 3 or equivalent) for every designated residential parking spaces. This policy duplicates building regulations.
- 2.16. The Building Regulations (2010) will standardise the requirement for electric charging points in development. Therefore, the policy should promote the provision of electric vehicle charging points generally but leave any specification to building regulations.

Delivery Policy ES1: Sustainable Construction and Design

- 2.17. The objective of the policy for achieving net-zero carbon is supported by Freeman Homes but duplication or conflict with building regulations should be avoided. The policy seeks an overall minimum 35% reduction in emissions over Part L2013 Building Regulations and, a minimum 10% reduction in emissions over Part L 2013 Building Regulations in homes through fabric energy efficiency improvement, and residual emissions offset through a carbon footprint calculator.

2.18. The policy risks becoming out of date quickly with the emergence of new building regulations. Part L 2013 will be replaced by a revised Part L document this year. The revised document is currently out for consultation and proposes to increase the need to reduce carbon output from dwellings. The current proposal suggests a 31% reduction above Part L 2013. The changes proposed to Part L under consultation also recommend a 'fabric efficiency' led approach to carbon reduction. The policy should be amended to align with Government proposals being implemented through building regulations.

2.19. Freeman Homes request clarification on the methodology and viability evidence in relation to the Stroud District carbon offset fund as referred to in Policy ES1. It is assumed that the Council will undertake separate consultation on how such contributions are calculated. Freeman Homes reserve the right to comment further on the policy pending such consultation and at the Examination of the Plan.

Delivery Policy ES2: Renewable or low carbon energy generation

2.20. The provision of decentralised and low carbon energy schemes requires detailed viability testing as it will not be deliverable on all development schemes.

Delivery Policy DES3: Heat Supply

2.21. The policy should not require provision of infrastructure on development schemes to connect to 'planned' heat networks, including connections 'currently unviable' when potentially there is no prospect of the plant never being utilised. Such practice presents viability and uncertainty for development proposals. Further clarification regarding the application of this policy is required and Freeman Homes reserved the right to comment further at the Examination.

3. Conclusions

- 3.1** The identification of land North of Nympsfield Road, Nailsworth (site reference PS07) as a housing allocation is supported by Freeman Homes.
- 3.2** The detailed wording of the proposed allocation for PS07 is generally supported. As highlighted in section 1 above, there is an apparent drafting error regarding the redline site boundary for the allocation PS07. This should be amended to be consistent with the natural field boundary defined by mature hedgerows as indicated by the plan at Appendix 1.
- 3.3** The site has no insurmountable technical constraints to development and can comfortably accommodate the proposed allocation for 25 homes. Freeman Homes is currently undertaking further feasibility work in relation to site layout and design which will be submitted for pre-application dialogue in due course, but at this juncture it is anticipated that the site can accommodate more than 25 homes along with strategic landscaping and open space. The site remains available, suitable and deliverable for residential development.
- 3.4** These representations raise a small number of soundness issues which require revision of specific policies for the plan to successfully proceed to adoption. Freeman Homes support the plan's progress towards examination and adoption.