

**Statement of Common Ground between (i) Stroud District Council (SDC)  
Council and (ii) the Promoters – Ridge and Partners LLP for Ecotricity Group Ltd**

<b>Local Plan Site Name and Policy Reference: PS20 Eco Park M5 Junction 13</b>
<b>Date: February 2023</b>

This Statement of Common Ground has been prepared by the two parties to establish the main areas of agreement between Council and site promoter and to identify any areas where further work is required for completion to prove soundness and deliverability to the Inspector.

1. Description of the site	The site is located to the west of Stonehouse within Eastington Parish, adjacent to the A419 and M5 Junction 13.
2. Local Plan context	The site comprises 42 hectares of primarily agricultural land which will be developed for approximately 10 hectares of business uses associated with the green technology and low carbon sector; a sports stadium with ancillary uses comprising fitness centre, hotel and sports training pitches; a care village and open space uses. The development will facilitate a canal cut, towpath and operational uses as part of the restoration of the Stroudwater Canal to navigable uses from Saul Junction to Stroud and beyond.
3. Relevant promoter representations	Representation 896 (Ridge and Partners and Morgan Elliot Planning for Ecotricity).  Promoters representations are relating to attached plan Appendix 1
4. Main areas of agreement.	<p>The promoter agrees with the provision of a Sports stadium, however, they would prefer flexibility on the final location within site. The promoter also agrees with the provision of ancillary uses including a hotel, fitness centre and sports training pitches.</p> <p>Approximately 10 hectares of business uses associated with the green technology and low carbon sector, including office (The promoter has requested the addition of Class E(g)(i,ii &amp; iii)), B2, B8 and ancillary uses, located outside of the Industrial Heritage Conservation Area (IHCA) and designed so as to minimise any potential harm and impact upon the IHCA.</p> <p>Canal cut, towpath and operational uses as part of the restoration of the Stroudwater Canal to navigable uses from Saul Junction to Stroud and beyond.</p> <p>Accessible natural green space providing a net gain to local biodiversity and linking with existing green infrastructure; Structural landscaping buffer along the M5, A419 and adjacent to residential properties at Westend and Chipman’s Platt, incorporating existing and new native hedgerows and trees.</p> <p>The acceptable management and disposal of surface water, including sustainable drainage systems (SuDS)</p>

	<p>Adequate and timely infrastructure to tackle wastewater generated by the development, in agreement with the relevant water company.</p> <p>A layout of uses, density and built form and character which ensures less than substantial harm to IHCA.</p> <p>High quality, safe and secure walking and cycling routes (The promoter comments that this will be promoted and delivered within the site, in order to reduce the reliance on the private car) to integrate all sections of the site and to connect with NCR45 and contributions towards the enhancement of off-site walking and cycling routes to key destinations including Stonehouse town centre, Stonehouse railway station and routes to Stroud.</p> <p>Public transport permeability through the site to facilitate existing diverted and new bus services and contributions to enhance bus service frequencies to key destinations including Stroud, Stonehouse and Gloucester.</p> <p>A dedicated shuttle bus service between the site and Stonehouse and Cam and Dursley rail stations. The promoter has requested additional wording that there will also be a shuttle service between Nailsworth and Stroud town centre and that all shuttle bus services will be provided on match days only.</p> <p>Contributions towards the re-opening of Stonehouse Bristol Road rail station.</p> <p>Electric vehicle charging points in accordance with local parking standards.</p> <p>Actively managed car parking provision to provide a level of constraint to unnecessary car usage.</p> <p>The promoter has requested additional wording for the provision of safe and secure cycle parking with electric charging points.</p> <p>Behavioural change measures to encourage sustainable travel by way of new and improved infrastructure and implementation of a Travel Plan.</p> <p>Primary vehicular access from the A419 and additional vehicular access from Grove Lane.</p>
<p>5. Main areas of disagreement / dispute/areas requiring further work.</p>	<p>The Promoter supports the provision of the Care village, however they request the removal of the reference to the location adjacent to Westend/Great Oldbury and the 70 bed requirement, to allow for the masterplanning of the site and end user flexibility to respond to the market when the scheme is developed.</p> <p>The promoter requests that criterion 1 is updated to allow for flexibility of the location of proposed uses to be determined by the masterplanning</p>

	<p>exercise (secured by the development brief and masterplan as set out within the policy). The specification within criterion 1 for the sports stadium to be 'to the north of the A419' is requested to be removed.</p> <p>The promoter requests that Condition 2 is updated to suggest that the employment park should primarily be for the green technology sector, in line with the Employment Land Review highlighted below.</p> <p>The promoter requests for Criterion 3 of the policy to be deleted (which specifies the location of the care village) and the word 'care village' incorporated into criterion 2 to make reference to that. Paragraph 3.2.21 should be also updated to retain flexibility.</p> <p>Minor changes to criteria 10 and 14 are requested to reflect the submitted planning application and mitigation secured through the approved stadium permission.</p> <p>The promoter requests that criterion 20 be removed on the basis that it is too open ended and may require a contribution for highway works that are not required or in any way related to the allocation. The promoter requests that any improvements to the highway network should be proportionate and shared between all benefiting developments.</p> <p>GCC have requested the following criterion is added, this is not supported by the promoter:</p> <p><i>'An initial Mineral Resource Assessment (MRA) to determine the significance of the underlying mineral resources present within the designated MSA and any mitigation measures necessary to avoid its sterilisation or strategy for its prior extraction'</i></p> <p>If the Inspectors feel that a criterion is required, the Promoter instead requests to use the wording as suggested by GCC within its previous consultation response. This is considered to give greater clarity on how the criterion is to be applied:</p> <p><i>To.... 'determine through an initial Mineral Resource Assessment (MRA), the significance of the underlying mineral resources present within the designated MSAs and the extent to which any mitigation measures will be necessary to avoid sterilisation by surface development and / or whether a strategy for the prior extraction of the mineral will be required for any future development proposals'</i></p>				
6. The promoters' anticipated start and build-out rates.	2020-2025	2025-2030	2030-2035	2035-2040	TOTAL

	<p>Outline planning application for the development of the stadium and the Eco-Park has already been submitted to the Council and is in the process of being determined. It is anticipated that this will be determined following the release of the Local Plan's Inspectors report (2023).</p>	<p>Commencement of development likely 2025.</p> <p>Development phased based on market demand as follows:</p> <ul style="list-style-type: none"> <li>- Phase A: Early phase highways improvements and outdoor training pitches. Laying out of cycle ways and other green infrastructure.</li> <li>- Phase B: Stadium, 30-50% of the Green Technology Cluster, the remaining training pitches, hotel and fitness centre, and ancillary uses with supporting transport infrastructure and improvements, and hard and soft works.</li> </ul>	<p>Phase C: Remaining Green Technology Cluster units and care village</p>		
	<p>There will be a phased approach to development.</p> <ul style="list-style-type: none"> <li>- Outline Planning Permission currently being determined.</li> <li>- Reserved Matters to be submitted within 2 years of approval and construction thereafter.</li> </ul> <p>Approximate phasing set out above but subject to market demand.</p>				
<p>7. Promoters' Deliverability/Viability Statement</p>	<p><b>Broad Policy Compliance for Proposed Uses</b></p> <p><i>Employment within the Green Technology and Low Carbon Sector</i></p> <p>The Employment Land Review March 2021 (EB30) identified six key segments of market demand for future employment land supply to satisfy, including encouraging the growth of the high-technology sectors, particularly focussed on green technologies. This is on the basis that around a quarter of local businesses (5,969 in 2019) and 13.0 percent of jobs (6,780 in 2018) into 'green' sectors. In total, '53,730 green jobs and 9,270 green businesses in Gloucestershire in 2018/19.'</p>				

The sites identified within the assessment are then scored against ten criteria relating to Site Location and Access, Planning Status, Site Conditions and Availability, out of a maximum score of 100. It identifies that the highest scoring sites are Quedgeley East (SA4a) and PS20: M5 Junction 13, reflecting these sites strong positions on both the M5 and major A Roads; at least some relevant planning consents; lack of constraints and the large, flexible nature of the sites generally. Both sites are under majority control of parties who are actively progressing development options, giving confidence that they can be delivered in a relatively short timeframe.

As such, the report therefore recommends the site is allocated within the Local Plan, noting that *'the Eco Park proposal appears readily deliverable, with strong backing from Ecotricity who will anchor the scheme, provide leadership in delivery, and help to bring in other occupiers from its supply chain/customer base. There is a sizable body of local firms which fall into 'green' sectors, which could require space, while Ecotricity also intends to market the site to inward investors. Additionally, South Gloucestershire and Stroud College, which has an existing relationship with Ecotricity, identifies the Eco Park as the preferred future destination in the short term for companies expanding from GSTP [Gloucestershire Science and Technology Park, Berkeley]. The site could also be a location for accommodating larger office requirements in the Stonehouse area. It is therefore recommended that the Council allocates the Junction 13, M5 Employment Site in the Local Plan.'*

It is recognised that the report goes on to note that conditions requiring the Eco-Park to just be occupied by 'green' businesses or other specific sectors should be resisted; however, recommends that the priority should be ensuring high standards of building, services etc, to ensure the Eco-Park meets the best standards of environmental quality and sustainability. In this sense, it is clear that the Councils evidence base supports the allocation of the site for a business park primarily aimed at 'green' businesses, to which there are many located in the local and regional area.

Development of the site would also help to meet the aspirations as set out by the Gloucestershire GFirst LEP. The Strategic Economic Plan (SEP) establishes a 'Growth Zone' along the M5 corridor to ensure availability of quality employment land in proximity to the M5 motorway attractive. The LEP has also published a draft of its Local Industrial Strategy which seeks to establish Gloucestershire as the greenest place to live and work in England and a 'magnet county' championing natural capital-based growth, creative green business development opportunities, and reducing its carbon emissions to net zero by 2050 or sooner. The Industrial Strategy supports the proposed development, highlighting that *'Ecotricity are also leading plans for a world-class low-carbon stadium and employment hub nearby at junction 13 of the M5. The Eco-Park will create up to 4,000 new jobs, with a focus on attracting companies from the growing green economy in Gloucestershire and beyond.'*

In this regard, the proposed development helps to meet the overarching objectives of the Council and the LEP in relation to providing a high-quality suitable premises, to promote the development of green businesses and grow knowledge-intensive sectors of the economy.

In addition to the above, the promoters have taken its own marketing advice with regard to the suitability of the site and the up-take of units on site. This recognises the sites' location is in a key employment corridor for both the District and the County. This employment corridor is strengthened by the good communications infrastructure in this locality (M5, A419, existing Stonehouse railway station and emerging/new railway station) which has maintained the attractiveness of this area as a key employment location for the District.

The existing employment in this locality is also recognised as being high quality and consequently attracting high quality businesses. The Eco-Park will increase the range of high-quality stock available to the District. Equally the new employment will be anchored by Ecotricity itself and thereby providing a further draw onto the business park by likeminded businesses who are developing and growing the green energy business within the County.

Moreover, the market has recognised that Stroud currently has a poor stock of high-quality, well-located office and R&D accommodation with a pent-up demand from emerging entrepreneurial businesses that are generally drawn to the County. The development of new high-quality office and R&D space will therefore help satisfy this demand and in assist in reducing the out commuting from the District.

The employment in this area is also complemented by existing and new housing at Stonehouse which provides a range of housing for employees, allowing them quick and easy access to the employment opportunities and providing employers with a workforce on their doorstep.

A combination of these factors makes the site attractive to the market and will ensure that the employment uses are the dominant and most vibrant use on site.

### *Sports*

The stadium, sports pitches and ancillary facilities are primarily to meet the needs of Forest Green Rovers Football Club (FGRFC) in respect of its playing and training requirements for the first team as well as Academy and women's teams. In terms of the stadium, there are a number of issues associated with the FGRFC current stadium at New Lawn, which was not designed to accommodate the large match day crowds which are now commonplace. The ambition of the club is to progress up the football leagues and new facilities are essential to enable the club to compete at this higher level, which cannot be met at the current location or with the current facilities. This has been acknowledged by the Football Association (FA).

Furthermore, the proposed development consolidates the club's playing and training facilities into a single location. There is currently a shortage of good quality pitches in the District and consequently, various teams within the Club (including the women's and youth teams) currently train in multiple locations, including as far away as Chippenham. This provides logistical difficulties for the club and is not sustainable in the long term. In addition, as well as the first team, the proposed pitches have been designed to meet the training and competitive fixture needs of the male Academy teams and other teams including those under the women's and girls' programme. Those teams support community use and will allow local boys and girls use of the grass pitches and the artificial football turf pitch. In addition, relocating training and competitive fixtures to the new facilities would free up a significant number of hours at other venues for use by the wider community.

#### *Care*

The Gloucestershire Local Housing Needs Assessment 2019 Report of Findings (May 2020) helps to illustrate the projected change of the Gloucestershire population by 5-year age band for the 20- year period 2021-41. Overall, for Gloucestershire, the growth in the older population represents over 90% of the overall population growth; 63,368 persons from a total growth of 69,372 persons are projected to be aged 65 or over, including an increase of 20,218 persons aged 85 or over. At the Stroud level, the Gloucestershire Local Housing Needs Assessment shows the most significant growth in those over 65. The ONS Subnational Ageing Tool highlights that in Stroud, by 2043, almost 29% of the population will be over 65, and almost 5% will be over 85. This is higher than the national average, as well as the average for the South-West Region. It is therefore clear that the population is ageing at a national level, and this is even further pronounced in Stroud.

In respect of planning policies, the NPPF identifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including older people). The Planning Practice Guidance (PPG) provides a guidance note on 'housing for older and disabled people', and identifies that *'the need to provide housing for older people is critical'*.

The Gloucestershire Local Housing Needs Assessment 2019 Report of Findings (May 2020) identifies the potential requirement for new specialist housing, taking account of the current population and existing stock together with the additional demand for the period 2021- 2041 based on the projected change in population aged 75+. It only assesses the need for sheltered and extra -care accommodation within Gloucestershire and does not include any other forms of housing for older people. Emerging Policy DCP2 looks to meet the need identified within the above assessment, identifying that developments will be supported that amongst others, *'increase the range of available housing options with care and support services in accessible locations.'* The

proposed care home and apartments are considered to meet the need identified within the adopted and emerging Local Plan in this regard.

#### *Hotel*

Market advice has indicated that there is a relatively limited supply of modern hotel beds within the immediate vicinity of the site, with 16 hotels and 355 beds within a five-mile radius. There is also currently a lack of luxury hotels (4-5 star) in the local area.

The site is an attractive location given proximity to the M5 Motorway and the Cotswolds. The proposed stadium and employment development will also drive demand for hotels beds in this location and complement the employment and sporting uses on the site as a whole. The site would also be attractive for tourist visits and those travelling to other parts of the country (e.g. long distance journeys to Devon and Cornwall). The growing population, as well as increased employment in the area, will boost the visiting friends and relatives (VfR) market and the corporate tourism respectively.

#### **Suitability of the Site for Development – Deliverability**

Ecotricity Group Ltd support the allocation of the site for mixed use development which is underpinned by the new business park and associated activities. Previous representations have been made to the Local Plan Review which set out the need for the proposals, as well as the deliverability of the site more generally. A significant amount of technical work has been undertaken to date as part of previous planning applications, as well as the current application for the Eco-Park which demonstrates the deliverability of the site. Furthermore, part of land to the north of A419 has planning permission for a new stadium, and land to the south of the A419 has permission for 2 x training pitches.

Key planning permissions of relevance are as follows:

- Application reference S.19/1418/OUT for *'a 5000-capacity football stadium and other ancillary uses (use Class D2); one full-sized grass pitch and one full-sized allweather pitch and a goal practice area (use class D2); car parking for cars and coaches and highway Project No. 5016035 10 improvements to the A419 including a signalised site junction and combined cycle/footway. All matters reserved save for access '*, was permitted in August 2020. This application was accompanied by an Environmental Statement. Reserved Matters are currently being prepared, which includes detailed design of the Stadium.
- Planning permission was granted in May 2021 for *'the change of use of land and Dutch barn from agricultural to D2 to allow for two football training pitches, with associated access, parking, landscaping and other ancillary works'* (S.20/1256/FUL) in respect of the southern parcel of the site east of the M5. A revised application for these pitches was also permitted in April 2022 which amended the location of the training pitches



	<p>(S.21/1739/FUL). The conditions on this planning permission were subsequently discharged in September 2022 (S.22/1068/DISCON). A further application has been submitted to relocate the parking area associated with the approved training pitches, which is pending consideration (S.22/1952/FUL)</p> <ul style="list-style-type: none"> <li>• A full planning application was submitted by Stroud Valleys Canal Company on 8th February 2019 for land to the south of the site for the 'reinstatement of the 'Missing Mile' section of the Stroudwater Navigation and development of associated infrastructure including locks, mooring basins, car parking, cafe/pub and leisure facilities building with combined office and residence for basin manager' (application reference S.19/0291/FUL). This application is still pending its decision.</li> <li>• Application reference S.22/0206/OUT was submitted in January 2022 for the entire Eco-Park. The application is for the '<i>proposed Eco-Park development comprising a 5,000 capacity football stadium, indoor and outdoor playing pitches, an Academy building, up to 37,700 sq.metres of Class E offices and 18,000 sq. metres of B2/B8 employment floorspace with up to 2,750 sq. metres of ancillary Class E food/retail/creche, a hotel with up to 100 beds, a Care Village including a 70 bed Care Home, as well as associated access, parking, landscaping and other ancillary works</i>'. This application is pending consideration.</li> </ul> <p>The above planning applications have involved a significant amount of technical work, which help to demonstrate the deliverability of the site.</p> <p>In particular, application reference S.22/0206/OUT was accompanied by an Environmental Statement, as well as many supporting documents which set out a full assessment of all material considerations relevant to the development of the site. The application is accompanied by a series of parameter plans securing land uses, heights and Green Infrastructure, and also includes an illustrative masterplan which is included at <b>appendix 1</b>. Full assessments undertaken as part of the above applications can be accessed through the Council if required<sup>1</sup>.</p> <p>The Eco-Park will form a 'Gateway to Stroud', showcasing the Districts ability to deliver high quality, low carbon, truly sustainable developments which are not overly dependent on the private car. A key element of this is the Transport Strategy for the site which looks to promote sustainable transport measures in line with the requirements of the emerging policy.</p> <p>These land uses will be set within a strong landscaped framework, providing integration with the river, canal restoration works and surrounding landscape, as well as biodiversity net gain. Ecotricity aim to achieve an overtly low carbon development with the delivery of the Eco-Park, and as such will embrace innovative building design and construction; green energy production; green infrastructure; sustainable</p>
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<sup>1</sup> <https://publicaccess.stroud.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=R6KJLWPN0DB00>

	<p>transport; sustainable urban drainage (SuDs) and the adoption of best practice ecological management and enhancement. The development will help deliver the objectives of emerging Core Policy DCP1, primarily in getting the District to carbon neutrality by 2030.</p> <p><b>Summary</b></p> <p>Ecotricity Group Ltd support the allocation of the site for an innovative business park focused on the development of green technology within the District and as part of a mix of uses across the site. We therefore support the allocation with the minor alterations suggested above.</p> <p>A significant amount of technical work has been undertaken to date as part of the above planning applications, and the consultant team has a full understanding of the site and its constraints. The planning permissions as well as the current application for the Eco-Park clearly demonstrate the deliverability of the site, as well as the ambition of Ecotricity Group Ltd to deliver the aspirations of the policy. As such, the allocation of the site is supported as a suitable and sustainable option for future development in the District.</p>
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Signed on behalf of the Promoters – Ridge and Partners LLP for Ecotricity Group Ltd	Signed on behalf of Stroud District Council
Date: 21/02/2023	Date: 21/02/2023
Name: [REDACTED] Position: Principal Planner [REDACTED]	Name: [REDACTED] Position: Head of Planning Strategy and Economic Development [REDACTED]

Appendix 1 - Plan relating to promoter's representations



NO	DESCRIPTION
1	Forest Green Rovers FC 5000 Seat Stadium
2	Stadium Pedestrian Zone
3	Shared Stadium and Employment Carparking
3a	VIP/Press Parking
3b	Players and Directors Parking
3c	Reinforced Grass Parking Zone
4	Seating Area
5	Hotel & Parking
6	Maintenance Building and Yard
7	Existing Building Restored (Maintenance Welfare Building)
8a	Green Technology Employment Cluster
8b	
8c	
9	Food and Beverage Retail/Office
D	Transport Hub (Bus and Coach Drop Off, Secure Cycle Parking, Waiting and Changing Room)
10a	Visitor Team Coach Drop Off & Parking
10b	Coach Parking Zone
10c	
7f	Care Home - 70 Bed
7g	Care Apartments
7h	Communal Areas
12	Forest Green Rovers Clubhouse and Indoor Football Turf Training Pitch
13	Forest Green Rovers Natural Turf Pitches
13a	Forest Green Rovers Outdoor Football Turf Training Pitch (Artificial Playing Surface)
14	Earth Mounding with Tree Planting
15	Safeguarded Land For Canal Restoration & Towpath
16	Anaerobic Digester
17	Orchard
18	Parkland

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PROJECT  
**Bee-Park**

PROJECT TITLE  
**Illustrative Masterplan**

DATE  
**December 2021** | SCALE  
**1:8000**

REPORT REFERENCE  
**Figure 7.20**

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