



Stroud Local Plan Review Examination



Hearing Statement Matter 6 Site Allocations



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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Eastington Parish Council (EPC) in response to the Inspectors' Matters, Issues and Questions relating to the Stroud Local Plan Review examination.
- 1.2 This Hearing Statement relates to Matter 6C – Stonehouse Cluster Site Allocations with reference to allocation PS20 M5, Junction 13. It is to be read in conjunction with the representations previously submitted throughout the plan making process.
- 1.3 By way of background, in April 2022 EPC objected to the revised Outline Planning Application S.22/0206/OUT for the proposed Eco-Park development on land at M5, Junction 13, West of Stonehouse, Eastington, Gloucestershire. The Outline application remains pending determination.
- 1.4 Overall EPC object to the proposed allocation under Policy PS20 as it will fundamentally erode the rural nature of Eastington Parish. The proposed allocation is not justified and therefore unsound; and the development is not considered sustainable.

2. MATTER 6C: STONEHOUSE CLUSTER SITE ALLOCATIONS

- 2.1 On behalf of Eastington Parish Council (EPC), we have provided a response to the Inspectors' Issues, Matters and Questions below.

Strategic Site Allocation Policy PS20 Stonehouse – Eco Park M5 Junction 13

30. This site is allocated for a strategic mixed-use development, to include employment, a sports stadium, sports pitches, a 70 bed care village, a hotel and canal and open space uses. The policy seeks a development brief incorporating an indicative masterplan, that will address 20 listed requirements.

A. The County Council representation highlights that part of the site allocation falls within designated Mineral Safeguarding Areas (MSAs) and that no reference is made to this within the policy or supporting text. This issue is acknowledged in the relevant Statement of Common Ground. What extent of the site is within the MSAs and what implications does this have for the allocation and the policy overall?

- 2.2 The aforementioned Statement of Common Ground does not appear to be available on the examination library. However, the submitted Mineral Resource Assessment (Ridge, December 2021) that accompanies Outline application S.22/0206/OUT identifies the Site within a MSA for sand and gravel.
- 2.3 Whilst the Applicant and Council may have an agreed position of the implications of the MSA this should be made public, and the allocation should not go ahead without a clear robust justification as to the implications of the proposal. To find emerging Policy PS20 sound, consideration of the site's location within the MSA is required to ensure that the policy is deliverable over the Plan Period (effective); and the allocation is supported by evidence in relation to the MSA (justified).

B. The supporting text states that the site is 42 ha in size. Approximately 10 ha of land for business uses are defined under criterion 2. How has this been determined and is it justified? Do the other proposed uses add up to the remaining 32 ha and are they justified?

- 2.4 The 10 ha for business uses appears to be pre-determined by the pending Outline Planning Application S.22/0206/OUT. Notwithstanding this, EPC do not consider the use of the land for business uses are justified for the following reasons:
1. The proposed business uses are not justified or required as part of the Made Eastington Parish Council Neighbourhood Development Plan 2015-2031 and are contrary to the Parish vision and employment objectives. The proposal is not considered to be of an appropriate scale and is considered to have adverse impacts on neighbouring properties and the locality against adopted NDP, Policy EP6.

2. Eastington is a Tier 3a settlement (Accessible Settlement with local services) where the Settlement Development Limit (SDL) are not expecting to change as part of the LPR. However, the development outlined under draft Policy PS20 will result in a disproportionate level of employment use within the rural Parish boundary contrary to the existing defined and emerging settlement hierarchy set out in the Local Plan.
3. The Policy allocates land outside of the defined Tier 1 settlement boundary, in a location that is isolated from the surrounding key employment locations. To this end, EPC consider that the Sustainability Assessment has incorrectly assessed draft Policy PS20 as benefiting from Tier 1 settlement status.
4. The employment evidence base does not specifically state that 10ha of employment uses should be located at the M5, Junction 13. Whilst it is recognised the Economic Needs Assessment (EB29) identifies the prime location for industrial demand in the district is along the M5, it does not specify the quantum of land for employment use. Specifically, paragraph 6.156 states:

“Interest in industrial space in Gloucestershire is focussed primarily along the M5 corridor, and most strongly at the junctions between J9-11a spanning Tewkesbury Borough and serving Cheltenham and Gloucester; and J12 in Stroud district, which serves the Gloucester and Stroud markets. J13 is also a popular location although the distance from Gloucester and Cheltenham means this is a slightly market area. The M5 corridor is also the most significant location for distribution uses in Gloucestershire.”
5. EPC consider that the allocation within the open countryside is unsustainable and will unnecessarily increase traffic movements. This view is supported by a National Highways holding direction on the outline planning application (in place until 12th April 2023) given the allocation's impact on the operation of the strategic road network. EPC draw attention to the concerns raised relating to traffic impact, trip rates, trip generation, the lack of assessment the development would have on the M5 Junction 13 and unknown modelling impacts.
6. As part of the sequential assessment undertaken in the supporting Planning Statement for the Outline Application S.22/0206/OUT the Applicant has reviewed the delivery of the 10ha of employment land previously allocated as part of West of Stonehouse. EPC are alarmed to understand the employment parcels are yet to come forward as part of Allocation S2 and therefore further contend the proposed 10ha of employment land as part of emerging Policy PS20 is not justified.

C. What is meant by a ‘care village’ and is this robustly justified in this location? Is the size of the facility (70 bed) based on need and is it viable?

- 2.5 EPC do not consider the provision of a care village is justified in this location for the following reasons:

1. The term 'care village' is not a definition under legislation, or national policy/guidance, nor is it in accordance with the Town and Country Planning (Use Classes) Order 1987 (as amended). Whilst it is understood from the pending planning application that this might comprise a c.70 bed care home, as well as several extra-care and sheltered housing options across 1.8ha site area, the proposed uses need to be clarified, as different care home uses will have different impacts that need to be assessed and justified as part of the policy allocation. Without knowing the exact uses, or their subsequent impacts, it is difficult for the care village to be robustly justified in this location.

2. National guidance under Paragraph: 006 Reference ID: 63-006-20190626 states:

'It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing. The location of housing is a key consideration for older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres.'

In this case EPC consider the site is not in a suitable location as it is not located near to local amenities, health services and is not located within a town centre. Whilst it may be located close to the proposed Coach and Bus Hub, it cannot be dismissed that the site is disconnected from the existing amenities and health services located in Stonehouse or Stroud and is poorly located to the existing strategic urban extension to the West of Stonehouse (known as Great Oldbury). As currently shown on the Illustrative Masterplan (Figure 7.20) the Care Home relates poorly to the adjacent residential properties along Chipman Plat and the William Morris School.

3. The Council and the developer are failing to give due consideration to reasonable alternative locations for the specialised housing proposed, such as the redevelopment of brownfield sites within or around existing town centres or expansion to existing care home facilities. EPC consider it is not appropriate to have specialised housing in an isolated location outside of any defined settlement development limits effectively in a countryside location, as it goes the Council's own development strategy of protecting the countryside from isolated and inappropriate development. Furthermore, the specialised housing in this location would result in additional trips generated on a daily basis which will be prejudicial to the volume of traffic of the adjoining road networks (M5 and A419).
4. The Sustainability Appraisal (CD3) recognises the development at PS20 would have a minor positive effect to SA objective 1: housing due to contributing to specialist housing needs in the District. However, it would significant negative effects on SA2 health, SA7 biodiversity/geodiversity, SA8 landscapes/townscapes, SA9 Historic Environment, SA11 Water Quality, SA12 Flooding and SA13 Efficient Land Use. EPC consider these negative effects should not be ignored.

III. Criterion 9 implies that there will be harm to the IHCA from the development of the site, as the wording seeks less than substantial harm. Is this approach consistent with national policy and legislation, particularly as regards the desirability of preserving or enhancing the character or appearance of a conservation area? Is the approach justified?

- 2.6 This approach is not considered to be consistent with national policy and legislation for the following reasons:
1. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires a Council to “have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses.” Whilst Section 72 of the act refers to the Council’s need to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in the exercise of their duties.
 2. NPPF paragraph 199 confirms when considering the impact of proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation (and the more important the assets, the greater the weight should be). Irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
 3. NPPF paragraph 200 states any harm to, or loss of, the significance of a designated heritage assets (from its alteration or destruction, or from development within its setting) should require clear convincing justification. EPC do not believe this justification has been provided.
 4. NPPF paragraph 202 confirms where a development proposal will lead to less than substantial harm to the significance of designated assets, this harm should be weighed against the public benefits of the proposal including where appropriate, securing its optimum viable use.
- 2.7 EPC consider that Criterion 9 is pre-empting the effects of the proposal on the IHCA when the wording of the policy should reflect the intentions of legislation and national policy to preserve and enhance the IHCA and its setting. EPC draw attention to these concerns which are also reflected by Historic England in their comments to Outline Planning Application S.22/0206/OUT.

E. Are there particular reasons as to why certain facilities, such as the sports stadium and care village, are to be located in specific areas of the site? Does this overly restrict the development brief process?

- 2.8 It would appear as though certain facilities are in specific areas as a result of previous planning permissions, namely the location of sports stadium and sports pitches, together with relevant technical constraints that affect the site.

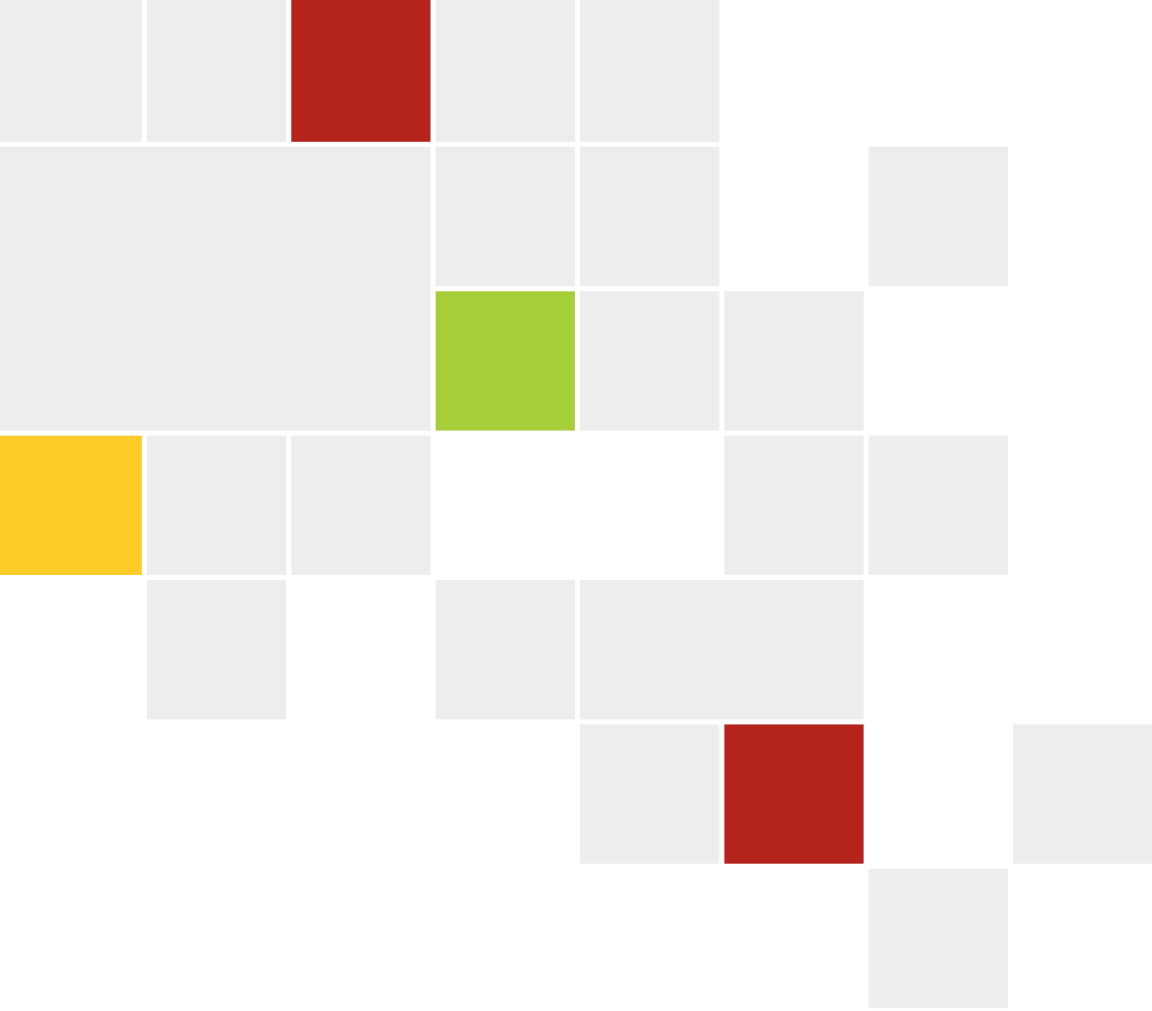
- 2.9 EPC consider the justification for the location of certain facilities should be clearly set out within the justification of the policy and that the technical constraints that affect the site further highlight that the site is not a suitable location for the extensive uses now sought as part of emerging Policy PS20 and Outline Planning Application S.22/0206/OUT.

G. Overall, are all the policy requirements justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?

- 2.10 For reasons outlined above, EPC do not consider that all the policy requirements to be justified by robust evidence particularly the requirement of approximately 10ha of business uses or the provision of a care village. Both the quantum of business use and specialised housing in this location fails to consider reasonable alternatives and EPC do not consider the Council to be applying an appropriate strategy but being led by a Developer to allocate the strategic site when existing employment allocations have yet to be built out (namely at Great Oldbury).
- 2.11 The policy wording relating to criterion 2 is not justified and the use of the word 'approximately' is not clear in terms of the final amount of business use that will be delivered. The wording for criterion 3 is not clear in detail and for aforementioned reasons needs to be revised to align with the current Use Class Order before the true impacts of that part of the allocation can be known. Criterion 9 also needs to be re-visited to ensure it accords with the wording of legislation and national policy to preserve and enhance the IHCA and its setting.
- 2.12 In light of these points, the policy wording is not considered to be sufficiently clear in detail and the policy is not effective.

H. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

- 2.13 EPC consider that the impact on existing infrastructure has not been suitably assessed, otherwise Highways England would not be maintaining a Holding Direction in place for Outline Planning Application S.22/0206/OUT.
- 2.14 On this basis, EPC maintain that the necessary infrastructure improvements and requirements are not yet fully known and therefore the policy is not justified or considered sound in accordance with the requirements of NPPF paragraph 35.



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