



RIDGE

**STROUD DISTRICT COUNCIL
LOCAL PLAN REVIEW
(EMERGING STRATEGY PAPER
NOVEMBER 2018) PS20b
ECOTRICITY**

December 2018



**STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW (EMERGING STRATEGY
PAPER NOVEMBER 2018)**

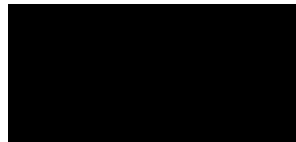
ECOTRICITY

December 2018

Ecotricity

Prepared by

Ridge and Partners LLP
Thornbury House
18 High Street
Cheltenham
Gloucestershire
GL50 1DZ



Tel: 

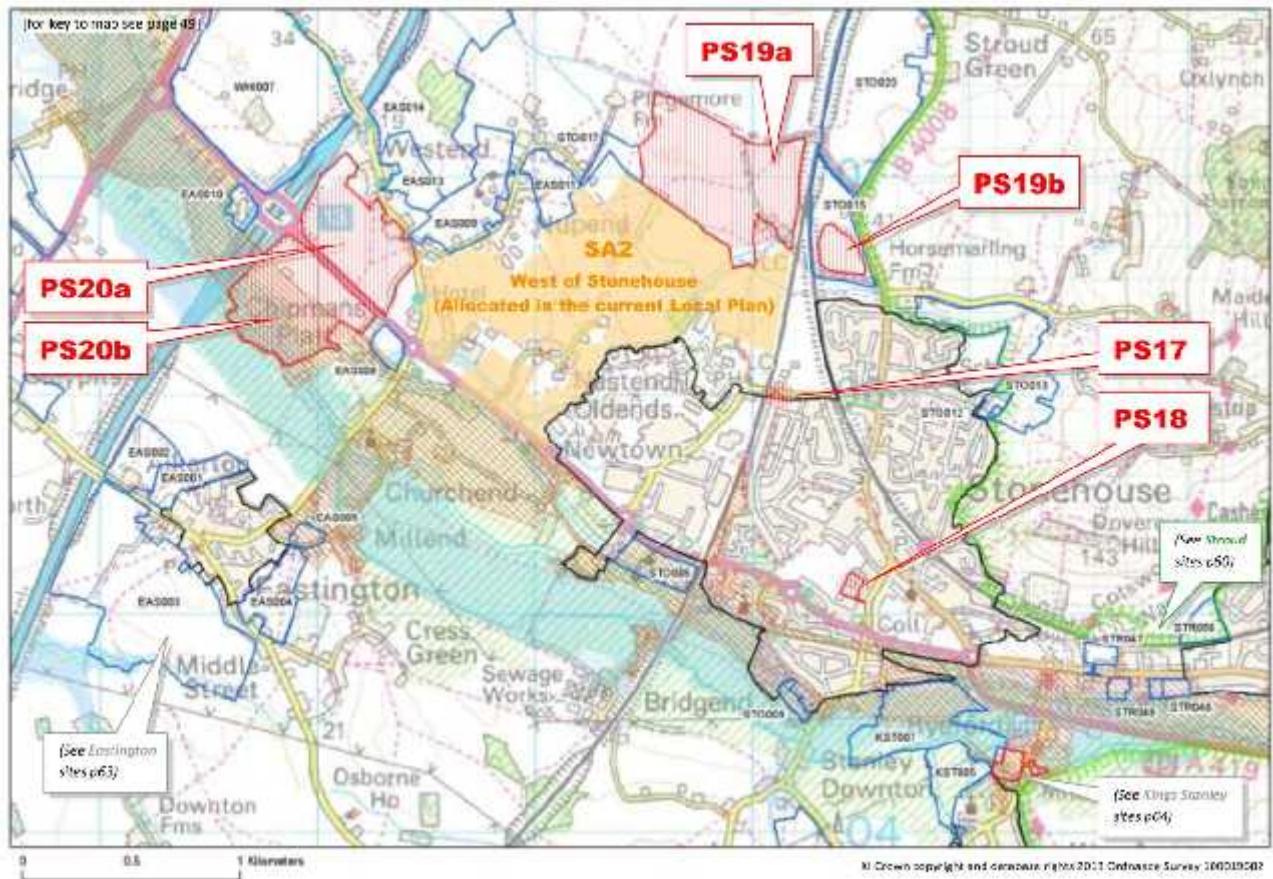
Job No. 5008273

CONTENTS

1. INTRODUCTION	3
2. SITE PS20B	6
3. NATIONAL AND LOCAL PLANNING POLICY	8
4. PROPOSED AMENDMENTS TO THE WORDING OF PS20B	12
5. CONCLUSION	13

1. INTRODUCTION

- 1.1. This representation has been prepared by Ridge LLP on behalf of Ecotricity Group Ltd in relation to the consultation on the Stroud District Local Plan Review: Emerging Strategy – November 2018 (LPR). Ecotricity is the longstanding promoter of Land at M5 Junction 13, West of Stonehouse.
- 1.2. The adopted Stroud District Local Plan (LP) sets out the Council’s strategy for distributing development within the District. The plan was approved in November 2015.
- 1.3. In line with best practice, the District Council has now commenced the process of reviewing the operative LP. An Issues and Options paper was released for consultation during the autumn of 2017. Submissions made to that consultation paper highlight that a lack of jobs within Stroud District is of great concern to local people; meaning that many people living within the area need to commute to larger city areas for employment. That consultation process also highlights the most popular locational choice for additional growth is along the M5 corridor.
- 1.4. Following detailed consideration of the responses received from the 2017 Issues and Options consultation, the District Council has now published its emerging development strategy in the form of the LPR. The LPR illustrates how the District seeks to meet its growth requirements over the next 20 years identifying sites for potential development.
- 1.5. On behalf of Ecotricity, Ridge LLP have made the following three representations to the LPR;
 - Referencing site PS06: New Lawn Housing
 - Referencing site PS20a: M5 Junction 13
 - Referencing site PS20b: M5 Junction 13
- 1.6. It is noted that there is a typological error within the LPR, with sites PS20a and PS20b incorrectly referenced; PS20a should reference the sports stadium and community uses and PS20b should reference the employment, canal and open space. The plan accompanying PS20 is detailed below. Furthermore, it is noted that the site area for PS20b is incorrect; the total site area is some 23 ha rather than the stated 10 ha.



1.7. The representation subject of this document makes specific reference to site PS20b which states;

PS20 M5 Junction 13:

b 18 ha sport stadium and community uses.

1.8. The following representation is made on the assumption that PS20b, instead, refers to;

b 23 ha employment, canal, open space

1.9. This representation will aim to address the following key question which is raised within the LPR

Making places: potential sites and alternatives...

If you would like to comment about whether we have identified the right settlements for growth, or whether other settlements have growth potential,

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).*

- 1.10. This representation supports the proposed potential site for growth, which is identified within the Stonehouse Cluster, and confirm that the site is suitable for the identified employment and open space. However it will be demonstrated that the site should include additional uses to provide a mixed use development. As such this representation will demonstrate that the following wording is more appropriate for this site;

PS20b 23 ha mixed use site including employment, residential, sports provision and retail.

Structure of this Report

- 1.11. Section 2 of this representation looks at the proposed site identified as PS20b in more detail and will provide a summary of the site and surrounding area, whilst also referencing the current planning application on the subject site. Section 3 will assess relevant planning policy and guidance, including the revised NPPF, the Strategic and Economic Plan for Gloucestershire March 2014 and relevant evidence base and background documents. Section 4 will reconfirm the support to PS20b (as suggested above to be revised) and will propose amended wording to the policy. In doing so, Section 4 will analyse the site's potential in terms of increased use and capacity, confirming it meets sustainable objectives and identified national and local plan policy. Section 5 will provide conclusions.

2. ALLOCATION PS20B

- 2.1. As above, the District Council's reference to PS20a and PS20b are labelled the wrong way round. Furthermore, the area of the site detailed within the wording is incorrect as it should be 23 ha rather than 10ha. For clarity, PS20b in the LPR should, therefore, read;

PS20 M5 Junction 13:

b) 23 ha employment, canal and open space.

- 2.2. Guided by the responses made to the 2017 Issues and Options consultation, the District Council's emerging development strategy seeks:
- i) To concentrate development requirements at locations where there is best access to services, facilities, jobs and infrastructure, and
 - ii) To concentrate employment growth within the A38/ M5 corridor and at locations in tandem with housing growth.
- 2.3. Ecotricity supports the principle of that emerging development strategy in relation to the employment and open space. However it is of the opinion that the locality and allocation should better reflect a mixed use approach; including employment, sports training facilities, housing and retail.

Location

- 2.4. The subject site comprises 23 ha of land. It is situated to the west of Stroud and Stonehouse and occupies an area immediately adjacent to Junction 13 where the M5 intersects the A419. Located to the south west side of the A419, the subject site is located within close proximity to the Stonehouse allocation, which obtained planning permission in 2016 for mixed use development comprising residential and employment land. Work has commenced on that site.
- 2.5. The subject site is flat and low-lying. It comprises predominantly of large agricultural fields separated by hedgerows and trees along the respective boundary lines. Part of the southern parcel of the site is situated within the Industrial Heritage Conservation Area. Some of that land is also within Flood Zone 2/3. The site does not fall within any other landscape or environmental designations.
- 2.6. In respect of landscape, a Landscape Sensitivity Assessment (LSA) was commissioned by Stroud District Council to support the 2017 SALA, and forms the evidence base for the adopted LP. Within the LSA, the subject site is divided into two; the area closest to the A419 has medium sensitivity to housing/business development, whilst the area immediately to the west has high sensitivity to employment development and medium/high sensitivity to residential development.

2.7. The site offers excellent transport links with its proximity to Junction 13 of the M5 motorway and also the A419 which intersects the site.

Planning History/current applications.

2.8. The subject site forms part of an area of land which is the subject of a current planning application (planning reference S.16/0043/OUT) for the development of:

- 5,000 capacity football stadium and other ancillary uses (Use Class D2);
- Two full-sized grass pitches and a goal practice area for First Team use;
- Parking for c.1,700 vehicles, with signalised site access and dualling of A419;
- A signal controlled pedestrian and cycle crossing of the A419, with a combined footway/cycleway on the south side of the A419 linking to National Cycle Route 45 (NCN45) at Grove Lane;
- A scheme for improvements to NCN45 from Stonehouse
- Bus connection between the proposed stadium and Grove Lane to enable buses serving the West of Stonehouse development to serve the Revised Scheme on match days.

2.9. The above application is predominantly situated on land to the north east of the A419.

3. NATIONAL AND LOCAL PLANNING POLICY

National Planning Policy Framework 2018 (NPPF)

- 3.1. Chapter 2 of the NPPF discusses the requirement to achieve sustainable development. Chapter 8 confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, these are as follows;
- a) An economic objective
 - b) A social objective
 - c) An environmental objective
- 3.2. The NPPF confirms at paragraph 11 that plans and decisions should apply a presumption in favour of sustainable development. For plan making this means;
- a) *Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.*
- 3.3. Chapter 3 of the NPPF discusses Plan- making and confirms at paragraph 15 that plans should;
- a) *Be prepared with the objective of contributing to the achievement of sustainable development*
 - b) *Be prepared positively, in a way that is aspirational but deliverable*
 - c) *Be shaped by early proportionate and effective engagement between plan makers and communities, local organisations, businesses infrastructure providers and operators and statutory consultees.*
- 3.4. Emphasis is placed upon the need to support the Government’s objective of significantly boosting the supply of homes. Paragraph 59 confirms that it is important that a sufficient amount and variety of land can come forward where it is needed.
- 3.5. Emphasis is also placed upon the need to build a strong and competitive economy. Para 80 confirms that planning policies should ‘*help create the conditions in which businesses can invest, expand and adapt*’. Significant weight should ‘*be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*’.

Stroud District Local Plan November 2015

3.6. Core Policy CP2 of the operative plan refers specifically to strategic growth and new development locations, seeking to concentrate most of the District's new growth at a series of strategic locations. The policy specifies that the strategic sites will be made up of locations at the principal settlements and key employment market areas such as the M5/A38 Corridor and south of Gloucester. The policy itself seeks to allocate 3,300 new homes and 58ha of additional employment land up to 2031. That housing allocation is made up of five new sites, of which Stonehouse is the largest. With regard to employment sites, there are four new sites identified, the largest of which is Stonehouse.

3.7. It is evident, therefore, that Stonehouse is identified within the operative LP as a sustainable settlement and one which is capable of accommodating growth. In terms of the settlement hierarchy, Policy CP3 identifies Stonehouse as a first tier Accessible Local Service Centre; one which is defined as the following;

'These are the District's main towns. They are the primary focus for growth and development to safeguard and enhance their strategic roles as employment and service centres. They will continue to provide significant levels of jobs and homes, together with supporting community facilities and infrastructure to meet their economic potential in the most sustainable way.'

3.8. The key housing policies are discussed in Chapter 4 of the LP. Policy CP7 sets out how new development will be expected to contribute towards meeting the needs of all sections of the community and should help to encourage community cohesion through the provision of facilities for community use, for health, social care, leisure, education or play. Mixed use is therefore encouraged.

3.9. The key economic policies and priorities in Chapter 5 of the LP. The title page from this Chapter simply states:

"Supporting economic growth by delivering a range and mix of employment uses, sites and types in the most appropriate location for that particular use, supported by and integrated with housing and other community infrastructure." (Our emphasis)

3.10. The economic future of the District is set out in strategic objective SO2, which states:

"Providing for a strong, diverse, vibrant local economy that enables balanced economic growth, coupled with enhanced job opportunities across the District."

3.11. Paragraph 2.41 of the LP sets out that there is a need to provide between 6,800 and 12,500 net new jobs between 2006 and 2031. Although the LP recognises that there may be a significant

oversupply of employment land to meet these requirements, it acknowledges that the models used in reaching these figures *'take no account of pent up demand, failures in the property market or the need for a range of sites and locations to provide for choice and continuum of supply beyond the Plan period.'*

- 3.12. Policy CP11 relates primarily to the delivery of new employment development within the District. The employment policies and objectives of the Plan have been designed to have regard to both strategic and local business needs and aim to facilitate a flexible supply of land to assist in moving forward to a low carbon economy.
- 3.13. The Policy identifies that too few jobs in the District, and jobs that only cater for a lower skills base, are factors that have led to considerable movement of higher skilled workers out of the District to other centres of employment such as Cheltenham and Bristol which are accessible and convenient centres for high skilled employment.
- 3.14. The LP recognises that the District has a reputation for advanced technology and creative skills and accordingly needs to provide new and attractive employment sites to encourage the development of these sectors within the District.

Strategic Economic Plan for Gloucestershire March 2014, GFirst LEP

- 3.15. The Strategic Economic Plan for Gloucestershire (SEP) was adopted in March 2014 and provides an over-arching vision for economic growth in the County. The LEP acts as the voice of businesses in the county and a link between private, public and voluntary sectors.
- 3.16. The SEP aims to accelerate economic growth and address particular challenges faced in the County. Some of the challenges identified are how to support the growth of knowledge-intensive sectors, the need for innovation to be a stronger driver of productivity and how to capitalise on our entrepreneurial culture.
- 3.17. Whilst the SEP recognises that Gloucestershire has a diverse and resilient economy, with particular expertise in renewable energy, it also recognises that some of the threats that the County currently faces relating to the lack of suitable premises for high value businesses and an insufficient number of attractive development sites.
- 3.18. To address these threats, the SEP has set a bold target for growth which is above the national average and in order to achieve this target has set out ambitious projects for growth. One of these projects is establishing a 'Growth Zone' along the M5 corridor, the aim of which is:

"The primary aim of the Growth Zone is to ensure the availability of quality employment land in proximity to the M5 motorway attractive to business and with excellent connectivity throughout

Gloucestershire and the rest of the UK. This will serve the latent demand in the market place and provide space required to enable Growth Hub supported business growth.”

“Focused on the M5 motorway corridor, the Growth Zone will provide space for sustainable business expansion by ensuring the availability of employment land in the best locations in the county with the necessary transport infrastructure essential to attract and retain high value-added business.”

Eastington Parish Council, Neighbourhood Development Plan 2015-2031

- 3.19. The Neighbourhood Development Plan (NP) has been designed to closely follow, and be in conformity with, the adopted LP. As a consequence of this, the NP is based on the development provisions of the LP.
- 3.20. The settlement boundaries in the NP are closely aligned to those defined in the LP. These reflect the strategic growth options in the LP.

4. PROPOSED AMENDMENTS TO THE WORDING OF PS20B

- 4.1. Subject to amending the typological errors noted above, site PS20b has been identified in the LPR as a site for potential development for employment, canal and open space. The use of the site for development is supported by Ecotricity, however, it is contended there should be additional uses incorporated as part of the allocation; in particular residential, sports training facilities and retail uses. Such a mixed use allocation would better fit the sustainable development objectives noted above, in a manner that only mixed uses truly can.
- 4.2. The utilisation of this 23ha site for those proposed uses, alongside the identified employment and open space provision, would comply with all layers of planning policy including the NPPF, LP, SEP and NP.
- 4.3. As such the wording of PS20b should be revised to read;

PS20b 23 ha mixed use site including employment, residential, sports provision and retail.

5. CONCLUSION

- 5.1. Sites PS20a and PS20b are incorrectly labelled within the within the ELP. Furthermore the area of land is incorrectly detailed as being 10 ha; it is in fact 23 ha. Notwithstanding these points, on behalf of Ecotricity, this representation seeks to confirm that the site identified in the ELP as PS20a should be allocated for mixed use and that Ecotricity is willing to, and capable of, bringing development at the site forward in a timely manner. The location of the subject site for mixed uses including employment, residential, retail and sports provision is consistent with the locational criteria set out both in the LP, SEP and NP. Furthermore, the advice provided within the NPPF supports a mixed use on this site. Such an allocation would create a large and deliverable volume of development within the 'Growth Zone' that will have the ability to create a high quality employment facilities, residential, retail and sports training facilities across a range of sectors.
- 5.2. In relation to question 5.1b therefore, on behalf of Ecotricity, it has been demonstrated that the ELP has identified a sustainable site for additional business uses. However, that business use should be complemented by a wider mix of development and land uses.



RIDGE



www.ridge.co.uk