

Oxford – Development and Planning

269 Banbury Road
Oxford
OX2 7LL
Telephone 01865 366660
Facsimile 01865 554059

**Representations to the Emerging Strategy Consultation of
the Stroud District Council Local Plan Review**

**Prepared on behalf of the [REDACTED]
Land east and west of Gloucester Road (B4008), Haresfield, Gloucestershire**

January 2019

1. Introduction

- 1.1 Strutt & Parker and BNP Paribas Real Estate act on behalf of the [REDACTED] family who are owners of land to the east and west of Gloucester Road (B4008), Haresfield, Gloucestershire (shown on the plan included at Appendix 1). Please accept this representation as our response to a number of the questions posed within the Council's Emerging Strategy Consultation of the Local Plan Review.
- 1.2 These representations are accompanied by a submission of our client's land at Gloucester Road to the Council's 'Call for Sites' for consideration in future reviews of its Strategic Assessment of Land Availability ("**SALA**"). This 'Call for Sites' submission represents an update of the submission made to the Council in August 2018. It comprises a wider area which includes additional land to the west of Gloucester Road that our client wishes to submit to the Council for its consideration (although both sites could be considered either independently or comprehensively).

2. Response to questions posed in the Emerging Strategy Consultation Paper, November 2018

- 2.1 Our client wishes to respond to the following questions posed in the Council's Emerging Strategy Consultation Paper.

Q1.0a Have we identified the top 5 issues for you?

- 2.2 The Council has identified the top 5 issues from those initial 40 issues suggested in its Issues and Options Paper (Autumn 2017), namely:
1. Ensuring that new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development;
 2. Conserving and enhancing Stroud District's countryside and biodiversity, including maximising the potential for a green infrastructure network across the District;

3. Maximising the potential of brownfield and underused sites to contribute to housing supply;
4. Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment; and
5. Tackling the acute lack of affordable housing in the District.

2.3 Our client wishes to highlight the fact that three of these five issues relate to housing development with the other two relating to the environment and the potential impact of development upon it. It is of note that the key issues make no mention of economic development or employment matters, although this is perhaps unsurprising given the preponderance of responses to the Issues and Options Consultation from members of the public, many of which may live in communities which they perceive may be risk of increased housing development.

2.4 Section 2 of the National Planning Policy Framework outlines how 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 through the preparation and implementation of plans. One of these objectives is an economic objective to *“help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity”* (paragraph 8). It also requires that planning seeks to *“create the conditions in which businesses can invest, expand and adapt”* with policies required to *“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth”* (paragraph 80). This includes land for employment development and paragraph 80 also outlines how *“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”*.

2.5 Whilst it is noted that part of the Council’s response to Issue 1 relates to employment development land, given the vital contribution of employment development to the District, it is recommended that the Council considers including an additional issue,

namely the number 1 priority area outlined in the Issues and Options Paper, *“Continuing to provide for job opportunities across the District, with a focus on knowledge based industries, environmental technologies, engineering and manufacturing, creative industries and high quality social care”*.

Q1.0b Do you agree with the ways we intend to tackle these issues?

- 2.6 Our client recognises and supports the fact that the Emerging Strategy proposes three strategies to address Issue 1 (ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development), the third of which is to concentrate employment growth within the A38/M5 corridor and at locations in tandem with housing growth.
- 2.7 It is clear that the M5 corridor represents the most logical location for allocating land for future employment development in the District when considering its excellent transport links and relative lack of landscape, heritage and other technical constraints. The Council’s report on the responses to the previous Issues and Options consultation (February 2018) demonstrated greater support for employment growth adjacent to the M5 than for the continued expansion of employment land at existing settlements and other sites across the District. Moreover, the Council’s current Local Plan already makes a significant employment allocation in this area at Quedgeley East (Local Plan policy SA4a, also referred to as site PS31 in the Council’s Emerging Strategy Consultation Paper) which is currently the subject of an application submitted by St Modwen Developments for 86,400sqm gross floor area of B1, B2 and B8 use classes. Furthermore, the Hunts Grove development and its proposed extension (Local Plan allocation SA4 and Emerging Strategy potential site PS30) immediately to the north of the M5 represents one of the key new housing developments in Stroud District, ensuring that housing and employment growth are co-located.
- 2.8 The Quedgeley East site is located immediately north of our client’s land at Gloucester Road which is well placed to help the Council respond to the issues raised in the Emerging Strategy document. Further details of the site are outlined in Section 3 of this representation below.

Q2.1a Do you agree with the way in which the Emerging Strategy intends to support the local economy and the creation of jobs?

- 2.9 Our client agrees with the views expressed by the Council in the Emerging Strategy document that the lack of jobs within Stroud District is of great concern and leads to residents of the District often having to resort to undesirable and unsustainable out-commuting to cities along the M5 corridor.
- 2.10 The Sustainability Appraisal that forms part of the evidence base underpinning the Emerging Strategy for the Local Plan Review highlights how there is a requirement to make appropriate use of the District's strong strategic transport links along the M5 corridor to facilitate future economic growth.
- 2.11 Consequently our client supports the aims of the Emerging Strategy in seeking to deliver a clear economic strategy to support sustainable economic growth for the next 20 years and in particular economic growth and additional jobs on an adjacent to existing high value employment sites and within the M5/A38 growth corridor, where the land at Gloucester Road is located. They also support the Council's ambition to co-locate employment and housing development to create sustainable communities and to reduce the potential for further out commuting.

Q3.2a Do you agree with the Strategic Objectives as drafted?

- 2.12 Our client notes and supports the Council's Strategic Objectives as suggested in the Emerging Strategy to provide a more tangible way of developing the Council's vision for the District, particularly Strategic Objective SO2 which provides for a strong, diverse, vibrant local economy that enables balanced economic growth, coupled with enhancing skills and job opportunities across Stroud District.

Q4.2a Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

- 2.13 An important element of the emerging growth strategy is to provide “sufficient new employment land to meet needs for the next 20 years” and the strategy looks to concentrate strategic employment growth at accessible locations within the A38/M5 corridor.
- 2.14 This element of the growth strategy derives from Option 1 of the four options the Council have considered in developing the Emerging Strategy Paper. It is notable that this option was the one that received by far the greatest support from those making representations to the previous Issues and Options consultation and is also the option that performed the best in the Council’s Sustainability Appraisal, undertaken to inform the Emerging Strategy. Our client supports the Council’s view that this option is the most sustainable in terms of the location of planned growth by locating employment uses in accessible locations close to the M5 where transport links are strongest and negative environmental effects on biodiversity/geodiversity, landscape/townscape and the historic environment are least likely. They would also suggest that this option is the most likely to help generate developer and public funding to help support the infrastructure improvements the Council, Gloucestershire County Council and Highways England seek to deliver as far as junction capacity improvements at Junction 12 of the M5 are concerned.
- 2.15 However, the Council acknowledges that it has not yet identified the exact amount of new employment land required in the Local Plan Review to meet current and future needs as an assessment of market demand has yet to be conducted. Despite this, the Council is clear that there is likely to be a requirement to find additional land as part of the Local Plan Review to meet future employment needs beyond 2031. Whilst our client recognises that the Council has committed to supporting the Gloucestershire First Local Enterprise Partnership’s updated Strategic Economic Plan and its new Industrial Strategy, (part of which will provide an assessment of new employment land to meet needs for the 20 years) they would stress the importance of this assessment and how their land at Gloucester Road is well placed to contribute to fulfilling the objectives of the emerging growth strategy.

Q5.1 Assuming some growth is desirable, have we identified the best site(s) at each town and village?

- 2.16 Our client's land is located within the 'Gloucester fringe' south of Hardwicke which the Council recognises as having an important employment role with the Council's preferred direction for employment growth being to the south and east of the settlement.
- 2.17 The Council has identified two potential employment development sites in this area. Quedgeley East (PS31) which is an existing site allocation in the current Local Plan (allocation reference SA4a) and is anticipated to deliver 13 hectares of employment land. The other is land south of M5 J12 (PS32) which is identified as a potential site for 5 hectares of employment land. The Wyevale Gloucester Garden Centre, site reference HFD007, is shown as an 'alternative site'.
- 2.18 Our client's land on the eastern side of the B4008 Gloucester Road lies immediately to the south of the Quedgeley East site, whilst that on the western side lies adjacent to the Wyevale Gloucester Garden Centre and other existing employment-generating land uses.
- 2.19 Given the amount of employment land required for the Local Plan Review is not yet defined and further land may be required, our client suggests that their land at Gloucester Road should be considered as a potential additional allocation in this key area of employment growth.
- 2.20 Moreover, whilst it is recognised that our client's land has not previously been assessed by the Council in its SALA or by their consultants' Sustainability Appraisal, it clearly shares many characteristics with those neighbouring sites that the Council considers as either potential or alternative allocations. It is suggested that, once it has been assessed in a future update to the SALA and/or Sustainability Appraisal, our client's land has the potential to score equally well as these sites.

- 2.21 For example, it is noted that Quedgeley East (site ref. HFD008 in the Sustainability Appraisal) that is already allocated in the current Local Plan scores positively ('+') in the Sustainability Appraisal in categories SA2 (Health), SA10 (Air quality) and very positively ('++') for SA16 (Employment) and SA17 (Economic growth). It also scores neutrally in terms of SA7 (Biodiversity/geodiversity as the site is not within 1km of any designated sites), SA8 (Landscapes/townscapes as the site is not covered by the Landscape Sensitivity Assessment and it is not within the Cotswolds AONB or within 500m of the AONB) and SA9 (Historic environment as the site was screened out of the SALA heritage assessment as having no heritage impacts).
- 2.22 It is considered highly likely that our client's land would receive similar scores in a future update to the Sustainability Appraisal.
- 2.23 It is also noted that site HFD009, the Quedgeley East Extension site, scores the same as HFD008 in most categories of the Sustainability Appraisal with the exceptions of:
- SA12 (Flooding) where it scores better than HFD008 as the site is on greenfield land outside of flood zones 3a and 3b. Our client's land is also outside of flood zones 3a and 3b and would therefore likely receive the same possible minor negative effect '-?' score as HFD009 when assessed; and
 - SA16 and SA17 where HFD009 scores slightly worse than HFD008. As suggested above, our client's land would likely receive the same likely significant positive effect ('++') score as HFD008 in these areas as it extends to more than 10 hectares.
- 2.24 Further details of our client's land at Gloucester Road can be found in Section 3 below.

Q6.1 Are there any other specific local studies that you believe are needed to inform the Local Plan review?

- 2.25 As mentioned above, our client supports the Council's commitment to supporting the Gloucestershire First Local Enterprise Partnership's updated Strategic Economic Plan and its new Industrial Strategy. The Council recognises that it needs to (along with other Gloucestershire authorities) undertake further work to identify a future economic growth strategy for Gloucestershire and the implications this has for employment policies and sites. In line with national policy and guidance, it is clear that an updated employment land review along with an assessment of future demand will be required for the Council to be able to confidently assess how much additional new employment land will be required to meet needs for the next 20 years.

3. Land at Gloucester Road, Haresfield

- 3.1 Our client's site is located within the Council's "Gloucester Fringe" Strategic Growth Area in the very north of the District and on the southern edge of the city of Gloucester. Core Policy CP2 'Strategic Growth and Development Locations' of the current Stroud District Local Plan sets out the present need for 58 hectares of employment land in the District and allocates strategic sites to deliver this requirement, principally within the Gloucester Fringe Strategic Growth Area which is the major focus for employment development.
- 3.2 The Council is now preparing a review of their Local Plan to roll the plan period forward to 2036. Whilst it is currently preparing an assessment of its requirement for new employment land as part of the evidence base for the wider Gloucestershire Strategic Economic Plan, the Council is already anticipating that new sites for employment development will be allocated in the review.
- 3.3 The first stage of the review was an 'Issues and Options' Consultation which took place in autumn 2017. In this consultation the northern part of the site east of the Gloucester Road was identified as part of a 'potential broad location' ('G4 south of M5 Junction 12') suitable for employment growth. The Council's report on the responses to the Issues and Options consultation (February 2018) showed the greatest local support for development option G4 compared to other sites on the southern edge of Gloucester. There was also more support for employment growth adjacent to the M5 than for the continued expansion of employment land at existing settlements and other sites across the District.
- 3.4 Land at Gloucester Road, Haresfield in total extends to 47.64 hectares situated on either side of the B4008 Gloucester Road, just south of the M5 Junction 12. The parcel of land east of Gloucester Road (20.61 hectares) lies immediately south of the Quedgeley East Local Plan employment land allocation (subject to a current application submitted by St Modwen Developments for 86,400sqm gross floor area of B1, B2 and B8 use classes) referred to as site PS31 in the Council's Emerging Strategy Consultation Paper. Furthermore, land to the north-east, site PS32, is also considered a potential site for employment development in the Emerging Strategy paper.
- 3.5 The parcel of land to west of Gloucester Road (27.03 hectares) lies adjacent to the Wyevale Gloucester Garden Centre (considered an alternative site HFD007 in the

Emerging Strategy paper) and the Javelin Park Distribution Centre (recently relaunched as Gloucester 12) which includes the new Gloucestershire Energy from Waste Plant. The latter two of these are also considered key employment sites under Policy EI1 of the Stroud District Local Plan 2015. Agricultural land lies to the east and south with the M5 forming a defensible western boundary of the land west of Gloucester Road.

- 3.6 The site benefits from direct access onto the B4008 immediately south of Junction 12 of the M5. The current application on the Quedgeley East site provides for significant upgrades to the Stonehouse junction with the B4008 which could provide access to the eastern parcel. The eastern parcel could also potentially be accessed from the roundabout serving the Javelin Park Distribution Centre. The western parcel could also be accessed directly from the B4008.
- 3.7 There are no known physical constraints that would prevent development of the site. The land is predominantly in agricultural use whilst some small areas of the land west of the Gloucester Road are currently used for an overflow car park for the Wyevale Gloucester Garden Centre and a construction compound for the Energy from Waste Plant. The majority of the site lies within Flood Zone 1 with a small area in the north-west corner adjacent to the M5 lying within Flood Zone 2. Areas of surface water flood risk are mainly restricted to the land adjacent to the M5 which wraps around Javelin Park. The land is relatively level and there are no known ground contamination or land stability issues.
- 3.8 The site is not within the Green Belt, Area of Outstanding Natural Beauty or Special Landscape Area and is not known to be subject to any other landscape, heritage or ecological designations. Whilst the site is visible from the escarpment of the Cotswolds Area of Outstanding Natural Beauty to the east, recent development as well as that consented or already allocated will significantly alter the site context in the future. The site therefore needs to be viewed accordingly along with appropriate landscaping and planting to help with mitigation/integration.

4. Summary

- 4.1 Our client **supports** the Council's vision and strategy for the District contained in the Emerging Strategy Paper, in particular the aim of concentrating significant new employment development on land close to the M5 Junction 12. However, given the amount of employment land required for the Local Plan Review is not yet defined and further land may be required, **our client suggests that their land at Gloucester Road should be included as a potential additional allocation in this key area of employment growth.**
- 4.2 Located adjacent to three separate existing employment sites (Wyevale Gloucester Garden Centre, Gloucester 12 and the proposed Quedgeley East business park) and with excellent transport links, the site is considered to be a natural extension of employment land in Stroud District in an area already favoured by the Council. The site is currently the subject of interest from a number of potential development partners, all of whom have extensive experience in promoting sites for large-scale commercial and employment uses. It is anticipated that a promotion partner will have been selected in time for the Council's forthcoming draft plan consultation in autumn 2019.
- 4.3 We would be happy to provide any further information or clarification if required and welcome the opportunity to discuss the merits of our client's land with the Council in greater detail.

Appendix A

**BNP PARIBAS
REAL ESTATE**



Haresfield, Gloucestershire

