



RIDGE

**STROUD DISTRICT COUNCIL
LOCAL PLAN REVIEW
(EMERGING STRATEGY PAPER
NOVEMBER 2018) PS20a
ECOTRICITY**

December 2018



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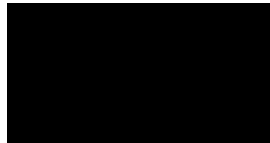
Prepared for

Ecotricity

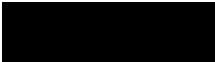
Prepared by

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

Contact



Tel:



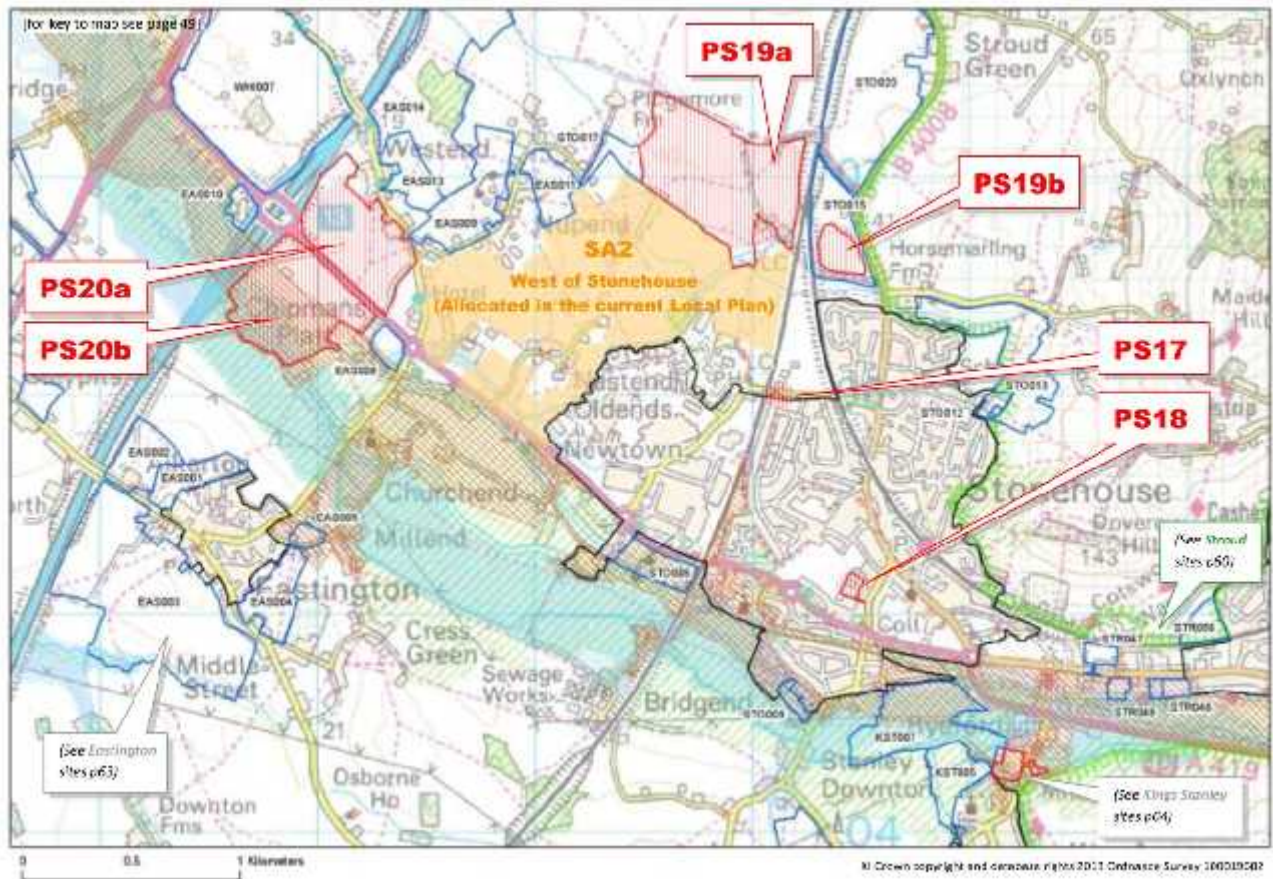
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1. INTRODUCTION

- 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 Stroud District Local Plan (LP) sets out the Council’s strategy for distributing development within the District. The plan was adopted 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 within the LPR, sites PS20a and PS20b are 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.



1.7. The representation which is the subject of this document makes specific reference to site PS20a which states;

PS20 M5 Junction 13:

a. 10 ha employment, canal, open space

1.8. The following representation is made on the assumption that PS20a states;

a. 18 ha sport stadium and community uses.

1.9. This submission aims to address the following key question 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. Ecotricity supports the proposed growth strategy for Stonehouse and confirms that its site is suitable for the identified sports stadium. However it is Ecotricity's position that the site is also suitable for additional mixed use development, excluding community use. As such this representation will demonstrate that the following wording is more appropriate for this site;

PS20a 18 ha mixed use site including a sport stadium.

Structure of this Report

- 1.11. Section 2 of this representation looks at the proposed site identified as PS20a in more detail and provides a summary of the site and surrounding area, whilst also referencing the current planning application. Section 3 assess relevant planning policy and guidance, including the revised NPPF, the Strategic and Economic Plan for Gloucestershire March 2014 and the supporting evidence base for the LPR. Section 4 reconfirms Ecotricity's support for the allocation of PS20a (as suggested to be revised) and proposes amended wording to the policy. In doing so Section 4 analyses the site's potential in terms of increased use and capacity, confirming that it meets the sustainable objectives and the identified national and local plan policy. Section 5 provides conclusions.

2. ALLOCATION PS20a

- 2.1. As above, the District Council's reference to PS20a and PS20b are labelled the wrong way round. For clarity, PS20 a should read;

PS20 M5 Junction 13:

a) 18 ha sports stadium and community uses

- 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 this emerging development strategy in relation to the sports stadium. However, it is not persuaded there is an evidence based case for community use, and as such the policy should be amended to support business and economic development use.

Location

- 2.4. The subject site is situated to the west of Stonehouse and occupies an area immediately adjacent to Junction 13 where the M5 intersects the A419. Comprising land to the north east side of the A419, the site is located immediately adjacent to the 'west of Stonehouse' allocation, which now has planning permission for mixed use development comprising of up to 1,350 dwellings and 9.3 hectares of employment land.

- 2.5. The site is flat and low-lying given its proximity to the River Severn and comprises predominantly of large agricultural fields separated by hedgerows and trees along the respective boundary lines. The site does not fall within any 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 LP. The northern parcel (identified as ST05) has medium/low sensitivity to housing/business development, the lowest landscape sensitivity of all land around Stonehouse. The site is the least sensitive in landscape terms in comparison to the remaining land around Stonehouse. The site falls within Flood Zone 1 and therefore there is no risk of flooding.

- 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 site is the subject to a recent planning application, supported by comprehensive technical reports, for the following;

- 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. As such, the site has been robustly assessed in respect of its ability to deliver the stadium use. Considerable technical work has been undertaken to inform that planning application, including an Environmental Statement. That work robustly assesses the proposals and the likely environmental impacts of any development, as well as any required mitigation. That work highlights that any likely significant environmental impacts of the proposal can be designed or mitigated out.

3. NATIONAL AND LOCAL PLANNING POLICY

National Planning Policy Framework 2018 (NPPF)

- 3.1. Chapter 2 of the NPPF discusses a 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 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. This 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. Key housing policies are discussed within 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 a wide range of facilities. Mixed use is 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 face relate 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 employment 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 PS20A

- 4.1. Subject to typological changes (as noted above) amending the site uses, site PS20a has been identified in the LPR as a site for potential development for stadium and community use. The use of the site for a stadium use is supported by Ecotricity. However, it is contended that the additional complementary uses at the site ought to be for a mix of uses including employment, retail and housing, rather than 'community use'.
- 4.2. It is clear from the above that the use of this site for a mix of uses, alongside the identified stadium use, would comply with all layers of planning policy including the NPPF, LP, SEP and NP.
- 4.3. It is considered that there is a lack of evidence of need for additional community uses at this location, given its close proximity to Stonehouse which has a number of existing community uses including Stonehouse Community Centre, Stonehouse Town Hall, and a variety and number of religious and recreation land uses.
- 4.4. As such the wording of PS20a should be revised to read;
PS20a 18 ha mixed use site including a sport stadium.

5. CONCLUSION

- 5.1. Sites PS20a and PS20b have typological errors in that they are labelled the wrong way round, as detailed within the ELP. Notwithstanding this point, on behalf of Ecotricity, this representation seeks to confirm that the site identified as PS20a should be allocated as an 18 ha mixed use site including a sport stadium. The importance of providing additional suitably located sites for mixed use development is identified at local planning policy level. Furthermore, the location of the subject site for such uses is consistent with the locational criteria set out both in the LP, SEP and NP. Additionally, the advice provided within the NPPF supports such a 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 stadium and mixed use across a range of sectors.
- 5.2. In relation to question 5.1a of the LPR, on behalf of Ecotricity, it has been demonstrated that the ELP has identified a deliverable and sustainable site for a new stadium. However, it is contended that additional mixed uses should also be allocated at the site, including employment, retail and residential.



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