

STROUD DISTRICT LOCAL PLAN REVIEW

REPRESENTATIONS TO THE PRE- SUBMISSION DRAFT PLAN (REG 19) CONSULTATION

FORMER ORCHESTRA WORKS SITE, WALK MILL LANE, KINGSWOOD

ON BEHALF OF QUINQUE STELLA HOLDINGS LTD

Prepared by: ■

Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

■ **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	THE DEVELOPMENT STRATEGY (2.5)	3
3.	SHAPING THE FUTURE OF THE WOTTON CLUSTER (3.7)	5
4.	POLICY EI2 – REGENERATING EXISTING EMPLOYMENT SITES	7
5.	FORMER ORCHESTRA WORKS SITE, KINGSWOOD	9

1. INTRODUCTION

- 1.1 Pegasus Group is instructed to submit representations on behalf of Quinque Stella Holdings in respect of their site at Walk Mill Lane, Kingswood. Quinque Stella Holdings has owned the former Orchestra Works site since 2017, which is currently designated as a 'Key Employment Site' (Policy EI1) in the adopted Local Plan and proposed to be designated as a 'Regeneration Employment Site' (Policy EI2) under the Local Plan Review. However, the site is simply no longer fit for purpose as an employment site and has struggled to find a new occupant since marketing efforts began in August 2020.



FIGURE 1: SITE LOCATION

- 1.2 The site has been vacant for a prolonged period of time and is unlikely to find a suitable occupant due to its poor condition, limited scope to expand further and unattractiveness for employment uses. This is reflected in the Stroud District Employment Land Review (ELR) which indicates that the site is essentially no longer suitable for business uses and should be considered for alternative uses, especially if it falls into a long-term vacancy. The site has been vacant since August 2020 and has been marketed with no success for almost 12 months.
- 1.3 Therefore, the site should either be allocated for residential uses or Policy EI2 should be amended to provide a clear trigger which would allow this to take place through the development management process.

- 1.4 In recent months alternative uses have been explored, with a residential use generating the most interest. A local Small Medium Enterprise developer has been secured to bring forward proposals for a mix of homes, reflecting the site's and Kingswood's unique character. Proposals will utilise renewable energy sources that will result in carbon zero (energy) being achieved across the site.

2. THE DEVELOPMENT STRATEGY (2.5)

- 2.1 We have no major comments on the proposed Development Strategy, beyond supporting the identification of Kingswood as a settlement capable of accommodating additional growth.
- 2.2 We also note that there is support for the regeneration of previously used sites and further infill development to maximise the use of brownfield land at these and other settlements, within settlement development limits. Again, this principle is supported on the basis that maximising the use of brownfield sites is generally more sustainable than development on greenfield sites and supported by the NPPF (paragraph 117).
- 2.3 We also agree that Kingswood should remain as a Tier 3a settlement within the adopted hierarchy.
- 2.4 Whilst we agree that 630 dwellings per annum is the minimum housing requirement that should be planned for, we consider that the affordable housing need within the district would justify consideration of a higher annual requirement.
- 2.5 Policy CP9 identifies an unadjusted affordable housing need of 424 dwellings per annum within Stroud. Policy CP9 seeks a minimum of 30% of housing to be delivered as on-site affordable for all major schemes; however, it is clear that this target will not even come close to delivering this 424 dwelling figure.
- 2.6 The minimum annual housing requirement derived from the Standard Method is 630 dwellings. Assuming that 30% of these dwellings are delivered as affordable, this would equate to only 189 dwellings per annum.
- 2.7 However, 75 dwellings per annum are expected to come forward as windfall sites. These sites will typically be minor development sites (<10 dwellings) where affordable housing contributions will not be required. Furthermore, the redevelopment of brownfield sites and the utilisation of vacant building credit can also reduce the level of affordable housing which comes forward, as a percentage of the overall target.
- 2.8 In short, it is likely that the best-case scenario would not even deliver half of the affordable housing the district requires over the plan period. Failing to deliver sufficient affordable housing has significant social and economic consequences.

Affordability is already identified as an issue in the Local Plan, one which it claims to address. However, this will be exacerbated under the proposed strategy.

- 2.9 A review of the previous consultation documents and supporting background papers does not indicate that the Council even considered uplifting the housing requirement to more effectively meet the district's affordable housing needs. One infers from the Local Plan Review that the uplift in the housing requirement (from 456 to 630dpa) is so significant that the district could not possibly entertain going higher than this minimum requirement. However, the shortfall in affordable housing delivery that would likely accrue at the end of the plan period is sufficiently significant to at least warrant consideration of a higher housing requirement, *as a minimum*.
- 2.10 Whilst we accept that there are viability and market related constraints which would make meeting affordable housing needs in full through an increased housing requirement unlikely, no consideration appears to have been given to this option. Given the potential social and economic consequences of failing to deliver enough affordable housing, it is surprising that this has not even been considered through the Local Plan Review.
- 2.11 It should also be borne in mind that the Council's ability to comfortably demonstrate a five-year housing land supply position over the plan period to date is likely a reflection of the strong demand for housing against a relatively suppressed housing requirement. Furthermore, the Local Plan Review notes that the district delivered 662 dwellings in 2019/20 which shows exceeding the 630dpa is possible. This is even more impressive given that it was achieved in a context where the Development Plan only sought to deliver around 456dpa and has allocated land accordingly.
- 2.12 In short, there is an acute need for affordable housing within the district which the emerging plan would not even come close to meeting. No consideration has been given to uplifting the housing requirement to better meet the affordable needs of the district. The Council's good record of housing delivery in recent years suggests that a higher housing requirement could indeed be delivered. There are, therefore, strong reasons why a higher housing requirement could be identified in the Local Plan Review.

3. SHAPING THE FUTURE OF THE WOTTON CLUSTER (3.7)

- 3.1 The Local Plan Review's vision for Kingswood in 2040 is as, *"a thriving village within an attractive landscape setting which benefits from its proximity to Wotton-Under-Edge and access to local employment boosted by pleasant and safe green walking and cycling links connecting Kingswood, Wotton under Edge and Charfield and other key local destinations. Smaller villages and hamlets may see small scale development in response to identified local needs, boosting their ability to remain sustainable and thriving communities."*
- 3.2 We are supportive of the identification of Kingswood as a centre for future growth. To deliver this growth, we note the proposals to deliver 50no. dwellings on land to the south of Wickwar Road.
- 3.3 Whilst this site is no doubt suitable for residential development, the Local Plan appears to have overlooked an obvious brownfield candidate for allocation which would be sequentially preferable to this site in sustainability terms.
- 3.4 The Local Plan explicitly supports the regeneration of previously used sites and further infill development to maximise the use of brownfield land at these and other settlements, within settlement development limits.¹ Paragraph 117 of the NPPF is explicit in its directive to ensure that strategies to meet the objectively assessed needs make as much use as possible of previously developed land (i.e. brownfield).
- 3.5 The former Orchestra Works site is no longer fit for employment uses and alternative uses need to be explored accordingly. The site lies within the Kingswood settlement boundary and is in Flood Zone 1. Aside from its current/proposed designation as a key/regeneration employment site, it is free from any substantive planning constraints making it an excellent candidate for redevelopment.
- 3.6 The Council's own Employment Land Review (ELR) acknowledges that the site is no longer suitable to employment uses and its recommendation to protect the site was purely on the basis that it was still occupied, which is no longer the case (the last tenant vacated the site in August 2020).
- 3.7 Access to the site is compromised in terms of its ability to function as a future employment site. The approach to the site is via a road serving existing homes and although adequate for existing and new homes on the site, accommodating lorries

¹ Paragraph 2.3.10

and deliveries associated with an employment use and the regularity of those movements would significantly impact existing homes and the wider road network within the village.

- 3.8 We would also question the merits of retaining this employment site within Kingswood when the Council's Settlement Role and Function Update (SRFU) notes that Kingswood is a net importer of workers, indicating a local imbalance between jobs and workers. This is likely to be exacerbated by the proposed allocation at Land west of Renishaw New Mills which will deliver significant additional jobs within the Wootton-under-Edge cluster.
- 3.9 In this context, there is no real need to regenerate a relatively small and insignificant employment site when there are plans locally to significantly expand a thriving employment site which would comfortably offset any employment opportunities that would be lost.
- 3.10 Furthermore, there is an argument to say that the local imbalance between jobs and workers needs to be addressed to promote more sustainable travel patterns and better self-containment.
- 3.11 In summary, there is a clear need for housing to come forward at Kingswood and so site allocations should be identified accordingly. Whilst we do not necessarily object to the proposed allocation at PS38, the former Orchestra Works site does not need to be retained for employment uses and is a clearly a sequentially preferable site which could be brought forward for high quality sustainable housing development either instead of, or alongside, PS38.

4. POLICY EI2 – REGENERATING EXISTING EMPLOYMENT SITES

- 4.1 Policy EI2 identifies four existing employment sites that are capable/worthy of some protection. This protection is not the same level as those identified under Policy EI1 and is designed to allow for their regeneration for a mix of uses, albeit this will require the provision of at least the same level of employment opportunities as were previously on the site.
- 4.2 The Employment Land Review (ELR) was the basis for identifying these sites. However, the recommendations for the Orchestra Works site are not reflected in the emerging Local Plan.
- 4.3 The Orchestra Works site scored 30 in the ELR, the lowest of all the sites considered. The description of the site in the ELR is provided below:

"This site is located on the edge of Kingswood settlement with accessibility limited to narrow, residential roads and therefore no prominence. Situated in a poor quality estate, with few occupiers to attract more businesses, the site has several constraints and no critical mass. Additionally there are no growth prospects without development on greenfield land/ outside of Kingswood settlement boundary. This isolated site is unlikely to be attractive to modern businesses and a broader range of uses could be considered here, subject to Local Plan policies."

- 4.4 The ELR only recommends protecting the site on the basis that the site is still occupied by businesses. Otherwise, the ELR recommends that the site be considered for other uses due to its lack of attractiveness to potential end users.
- 4.5 The site was previously occupied by an established printing company (Orchestra Group) which operated there for around 60 years until 2011. The site was then taken on by another printing company (DCL Print) before they ceased operations in the summer of 2020. The site is, therefore, currently vacant.
- 4.6 The property has been listed online (Rightmove/Zoopla/DJPNR) since August 2020. An advert has also been published in the WDP on several occasions. There has been some interest, but this has been sporadic and waned quickly upon further investigation given that the buildings are in poor condition. Significant investment in the site would be required and this has put a number of potential

- businesses off taking the site on. A marketing report is being prepared for the site and will be shared with the Council shortly.
- 4.7 On the basis that the site is no longer occupied and there is limited demand for employment generating uses on it, the site should be considered for alternative uses, as per the recommendations of the ELR.
- 4.8 The site presents an excellent opportunity to deliver housing on a brownfield site in a sustainable location and reduce the pressure on greenfield sites to meet the Council's housing requirement. It should, therefore, be removed from the list of protected sites under emerging Policy EI2.
- 4.9 Alternatively, Policy EI2's wording should be amended to allow for the site's redevelopment for non-employment related uses. The policy wording allows development for non-employment uses to come forward on these sites, but also requires there to be the same level of employment opportunities as there were previously. The policy does say that this is subject to viability and site-specific circumstances; however, there is little clarity on what circumstances would allow for an exclusively non-employment use to come forward on the site (e.g. residential).
- 4.10 As evidenced in the ELR, it is improbable (at best) that there will be scope for employment generating uses to remain on the Orchestra Works site given its physical and locational constraints are unsuitable for modern businesses. As such, there needs to be a degree of flexibility built into the wording of the policy to allow for these sites to be redeveloped for non-employment uses in the event that reasonable evidence can be presented to show that there is little to no prospect of employment uses being delivered. As is typically the case elsewhere, this should require the submission of robust marketing evidence to confirm that there is no demand for employment uses on the site. The policy or its supporting text could provide guidance on the nature of the evidence that would need to be submitted (minimum marketing period, details of marketing strategy etc).
- 4.11 This will provide clarity to developers and applicants looking to bring forward proposals for alternative uses on these sites where employment generating uses are simply not possible.

5. FORMER ORCHESTRA WORKS SITE, KINGSWOOD

- 5.1 The former Orchestra Works site covers an area of around 0.75ha and is comprised of a series of single storey buildings. The location and approximate extent of the site are shown below.



FIGURE 2: SITE LOCATION PLAN EXTRACT

- 5.2 As mentioned above, the site was vacated last year and has been marketed since August 2020 to no success. The site has generated only limited interest due to the poor quality of the existing buildings, its poor vehicular accessibility at the end of a residential street, limited scope to expand the premises and the significant investment that would be required to make it sufficiently attractive to potential end users.
- 5.3 The poor level of interest supports the conclusions of the Council's Employment Land Review (ELR) which gave it the lowest score of all the sites currently identified as 'Key Employment Sites' within the district. The ELR also recommended that alternative uses for the site should be explored if the site was vacant. The site has been vacant since August 2020 and there its prospects of finding another occupant are extremely low.
- 5.4 The site should no longer be protected for employment uses, either under Policy EI1 or EI2 as a result and its redevelopment for residential uses should be considered accordingly. Kingswood has been identified for further growth with a greenfield site allocated for 50no. dwellings on its southern edge.



FIGURE 3: PHOTO OF EXISTING BUILDINGS

- 5.5 The NPPF sets out a clear directive to ensure that opportunities for brownfield regeneration should be maximised and this would make the former Orchestra Works site sequentially preferable to the proposed allocation PS38 in sustainability terms.
- 5.6 The site would be capable of accommodating around 20-25 dwellings and should be allocated accordingly in the Local Plan Review.