

4. EMPLOYMENT AND TOURISM

4.1 GENERAL OBJECTION TO EMPLOYMENT AND TOURISM CHAPTER

The Objections

Emp (Str&C/D)/329/1013 Cotswold Canals Trust

Summary of Objections

- (a) The plan should indicate that an overall planning approach to changes in the area of Frome Hall will be adopted. Development here should make a contribution to Canal restoration.

Inspector’s Reasoning and Conclusions

4.1.1 I agree with the objector that an overall planning approach to changes in the area of Frome Hall and Lodgemore Mills would be appropriate. However, I understand from the evidence that from an independent study carried out on behalf of the Council there is some difficulty in securing further development of the area. It seems to me that because of these doubts proposals which might lead to the loss of employment land would in the interim need to be dealt with under Policy E2. The Council favours a mixed form of development and once the future of the area becomes clearer a planning brief could be prepared as Supplementary Planning Guidance. I would expect such document to show the relationship of any development to the canal and whether it would be appropriate to seek contributions to restore the Canal as an integral part of the development. Any obligations would need to be sought on the basis of national guidance.

RECOMMENDATION 4.1

Make no modification to the Plan in response to this objection.

4.2 PARAGRAPH 4.3.4

The Objections

Emp/para. 4.3.4./558/2422 Robert Hitchins Limited

Summary of Objections

- (a) The plan does not contain well argued policies to address the problems of out-commuting.

Inspector’s Reasoning and Conclusions

4.2.1 It is accepted in paragraph 4.3.4 of the supporting text that out commuting takes place to Cheltenham, Gloucester and Bristol. It seems to me that the thrust of the Plan is to encourage employment uses in close proximity either to existing housing, or as part of a mixed use scheme. However, even with a mixed-use scheme the Council has no control over where people decide, or are able, to work. It can only provide a convenient choice within the district. I have dealt with objections to particular sites and locations elsewhere in this Chapter and also when dealing with mixed-use sites.

RECOMMENDATION 4.2

Make no modification to the Plan in response to this objection.

4.3 PARAGRAPH 4.5.2

The Objections

Emp/para. 4.5.2./1/3004

Gloucestershire County Council

Emp/para. 4.5.2./543/3753

Government Office for the South West

Summary of Objections

- (a) Whilst the principle of adopted Structure Plan policy E.2 is correctly stated, the allocations of employment land do not accord with it.
- (b) Objects to text summarising the Structure Plan. Priority should be for employment related to Dursley.
- (c) Whilst this paragraph points to focus for employment provision it is inconsistent with other references in the Plan, such as “land needs to be distributed through the District”. (para 4.6.4).

Inspector’s Reasoning and Conclusions

4.3.1 It seems to me that it is not the wording of paragraph 4.5.2 which is incorrect as it merely reiterates the principle established by the adopted Structure Plan in Policy E2. What the objectors infer is that the local plan allocations and priorities do not reflect that policy. I have dealt with objections to specific allocations in this chapter and elsewhere in the Plan where mixed-use sites are considered.

4.3.2 I see no reason why the text should not summarise the Structure Plan as its strategic policies form a basis for the Local Plan. However, I consider that the problems of Dursley have been addressed in the Housing and Dursley chapters where I deal with mixed use sites.

4.3.3 As in Section 4.5 the Council is repeating the priorities of the Structure Plan I do not believe the wording should be changed. However, paragraph 4.5.2 does emphasise that in

general, employment provision should relate well to housing, other community facilities and public transport. Although paragraph 4.6.4 mentions that land needs to be distributed throughout the district other policies of the Plan ensure that new employment development is provided in sustainable locations.

RECOMMENDATION 4.3

Make no modifications to the Plan in response to these objections.

4.4 SECTION 4.6.

The Objections

Emp/para. 4.6.1./409/1386	Buchanan Partnership
Emp/para. 4.6.5./409/1387	Buchanan Partnership
Emp/para. 4.6.8./415/1525	Redrow Homes (SW) Limited
Emp/para. 4.6.9./308/0857	Ministry of Agriculture Fisheries and Food (MAFF)
Emp/para. 4.6.9./308/3197	Ministry of Agriculture Fisheries and Food (MAFF)
Emp/para. 4.6.9./329/1003	Cotswold Canals Trust
Emp/para. 4.6.9./415/1505	Redrow Homes (SW) Limited
Emp/para. 4.6.9./558/2423	Robert Hitchins Limited

Summary of Objections

- (a) Ask ‘what is the review of allocations contained in the SDLP Deposit Version 1994 and of the commitments.’? Is this a public document?
- (b) Explain what ‘the rural employment study’ is.
- (c) The review of employment commitments should have preceded the publication of the Plan. If some sites are seen as unsuitable, how will replacement sites come forward?
- (d) The requirement for the re-use of rural buildings for employment uses to be well-related to services and facilities is over-restrictive.
- (e) The second bullet point in paragraph 4.6.9 is overly restrictive to development in rural areas.
- (f) The economic importance of restoring the Stroudwater and the Thames and Severn Canals is not mentioned in Chapter 4.
- (g) The strategy for the economy fails to mention the need for employment sites to be attractive to new or existing employers.

Inspector’s Reasoning and Conclusions

4.4.1 As (a) and (b) appear to be part of an ongoing monitoring process, with the results of the study on employment land availability already included in the Plan, I see no reason to refer in more detail to the study.

4.4.2 A review has now been carried out and the Council’s revised policies are based on

that review. Alternative allocations are before me following objections to allocated sites.

4.4.3 As Policy E6 specifically deals with new buildings for farm based enterprises I believe there is enough flexibility to encourage small-scale proposals in accordance with national guidance. I do not consider it would be appropriate to amend bullet point 11 to generally encourage diversification of the rural economy by the erection of new buildings placed anywhere in the countryside.

4.4.4 The Council has amended the wording in Proposed Change PRO026 to meet this objection by requiring “the majority” of employment uses to be genuinely accessible by public transport. I believe this amendment provides the necessary flexibility to deal with proposals such as farm diversification in rural areas where public transport is not, and is unlikely to be, readily available.

4.4.5 Cheapside Wharf is a mixed use site close to the town centre and is consequently dealt with in the Town Centres and Retailing Chapter. Contributions towards the restoration of the canal are sought under Policy S5A and paragraph 6.9.4b explains what provision will be sought.

4.4.6 The Council in its evidence has accepted the need for this revision in its Additional Proposed Changes. This could best be done by adding the words “and be in locations that are attractive to employers”

RECOMMENDATIONS 4.4

- a) Modify paragraph 4.6.9 bullet point 1 in accordance with Additional Proposed Change, by adding the following to the end of the sentence after the words “resident workforce” “and be in locations that are attractive to employers”
- b) Otherwise modify in accordance with Proposed Change PRO026.

4.5 POLICY E1A

The Objections

E01A/1/3005-CW	Gloucestershire County Council
E01A/299/3179-CW	Gloucester City Council
E01A/308/3195	Ministry of Agriculture Fisheries and Food (MAFF)
E01A/333/3259	Painswick and District Conservation Society
E01A/362/3330	Colthrop Farm Limited
E01A/362/3331	Colthrop Farm Limited
E01A/362/3332	Colthrop Farm Limited
E01A/362/3333	Colthrop Farm Limited
E01A/362/3334	Colthrop Farm Limited
E01A/395/3372	Miss A Webb
E01A/396/3376	Mr & Mrs E J Young
E01A/396/3377	Mr & Mrs E J Young

E01A/398/4053	Mrs E Akhurst
E01A/398/4054	Mrs E Akhurst
E01A/400/3382	Mr & Mrs S Adams
E01A/404/3386	Mr & Mrs H Shuttleworth
E01A/404/3387	Mr & Mrs H Shuttleworth
E01A/406/3393	Mrs J Dunlop
E01A/406/3394	Mrs J Dunlop
E01A/407/3400	Smith Barry Estate
E01A/408/3406	Hardwicke Court Estate
E01A/408/3407	Hardwicke Court Estate
E01A/412/3444	Crest Strategic Projects Limited
E01A/412/3445	Crest Strategic Projects Limited
E01A/412/3446	Crest Strategic Projects Limited
E01A/412/3447	Crest Strategic Projects Limited
E01A/412/3474	Crest Strategic Projects Limited
E01A/415/3510-CW	Redrow Homes (SW) Limited
E01A/415/3511	Redrow Homes (SW) Limited
E01A/444/3656	Various Clients of Andrew Watton
E01A/496/3720	Four Oaks Developments Ltd
E01A/496/3721	Four Oaks Developments Ltd
E01A/543/3749	Government Office for the South West
E01A/801/4106	Industrial Sales Limited
E01A/801/4108	Industrial Sales Limited
E01A/801/4110	Industrial Sales Limited
E01A/801/4112	Industrial Sales Limited
E01A/801/4114	Industrial Sales Limited

Summary of Objections

- (a) Revise wording to remove the implication that it is not always desirable for warehousing and distribution uses to be easily accessible to their workforce. The last two sentences should be made a separate paragraph as they deal with different issues from the first part of the paragraph.
- (b) The City Council still consider that employment sites at Hardwicke should be protected to meet B8 needs.
- (c) Policy is over restrictive to the provision of employment opportunities in rural areas provided for by E5A, E6 and B15.
- (d) Allowing general industry in or adjacent to Painswick does not take account of its rural character and the importance of tourism to the local economy.
- (e) The Plan should be more explicit about the priority to be given to the location of employment close to Gloucester in the Central Severn Vale.
- (f) E1A restricts proposals for business to protected sites, allocated sites, sites within and adjacent to settlement boundaries and fails to recognise the diversity of employment uses in the countryside.
- (g) New employment locations reflected in para 4.6.9c and policy E1A are not consistent with the settlement analysis in 2.6.1a-v.

- (h) The distribution and balance of new development within or outside the District will not ensure that sustainability objectives will be achieved.
- (i) There is no indication of how, in the case of warehousing and distribution uses, locational factors should be balanced
- (j) The criteria and therefore policy should only relate to other employment development (windfalls).
- (k) Criteria in E1A is too restrictive. Each application should be treated on its merits.
- (l) Land adjacent to MoD Aston Down should not be dealt with under Policy E1A but should be specifically allocated
- (m) It is not clear how the provision for business and general industrial uses (B1 and B2) in 25 settlements or provision for travel intensive uses such as offices fits with the strategy of focused development. Clarification is required.
- (n) The text could be more explicit about the role that employment locations such as Meadow Mill Ind Estate have in providing local employment opportunities.
- (o) Object to the requirement for B1 and B2 uses to integrate with housing etc.

Proposed Changes

E01A/PRO028/333/6015/CO	Painswick and District Conservation Society
E01A/PRO028/339/6014/CO	Moreton C Cullimore (Gravels) Ltd
E01A/PRO028/753/6007/CO	Woodchester Parish Council

Summary of Objections

- (a) The proposed amendments relating to B2 and B8 uses and resultant presence of HGV vehicles will cause harm to settlements.
- (b) Policies should be cross-referenced to protect residential amenity and the wider local environment.
- (c) Large scale should be defined.
- (d) The proposed deletion of reference to sites adjacent to settlement boundaries is disadvantageous to an employment omission site at Netherhill depot.
- (e) Storage and distribution uses are liable to generate HGV movements irrespective of whether they are ‘large’.

Inspector’s Reasoning and Conclusions

4.5.1 I consider these objections about the clarity of the two paragraphs to be well founded, as does the Council. Paragraphs 4.6.9b and 4.6.9c have been revised accordingly.

4.5.2 It seems to me that Policy E1 protects listed employment sites, including those at Hardwicke. The Council has introduced revised Policy E1A and states in response to this objection that a proposed change of use from B8 to other employment uses would be dealt with under this new policy, as revised by Proposed Change PRO028. Although the policy lays down criteria to be considered when large scale B8 uses are proposed, I do not find it helpful in determining when B8 uses of any scale might be replaced by other business or industrial uses. For example, it is not clear to me under what criteria a change of use from B8 to say B2 would be acceptable. I am not aware from the evidence whether existing B8 uses need specific

protection from pressures for change of use. If they do and this policy is intended as a tool to protect them, then the Council should consider introducing some criteria against which such changes could be assessed. I am unable to suggest revised wording because the extent of the problem, if there is one, is not clear to me.

4.5.3 The policy has been reworded to include the words “large scale” in relation to travel intensive uses and storage and distribution uses. The definition of “large scale” has now been included in the supporting text and is development greater than 2500 sq.m.

4.5.4 I agree that to encourage industrial development outside of settlement boundaries would lead to pressure on attractive countryside which forms an important setting for the towns and villages in an area where tourism is a main attraction. In the revised Policy E1A development will only be permitted within settlement boundaries. Development in the countryside will be dealt with under Policies E5A and E6 and extensions within settlements and adjacent to them under Policy E4.

4.5.5 I do not believe that the Plan should be more explicit than it is about the priority to be given to the location of employment closer to Gloucester and the Severn Vale. The Plan is now attempting to balance the location of employment throughout the district to reduce the need for commuting outside of the district.

4.5.6 I do not consider that revised Policy E1A fails to recognise the diversity of existing employment uses in the countryside. The expansion of existing rural employment generating uses in the countryside will be considered under criteria in Policy E5A and B15 and new farm based enterprises under Policy E6. Also Policy E1A has now been modified to address “large scale” proposals.

4.5.7 The policy has been revised to provide consistency on new employment locations.

4.5.8 Paragraph 4.6.9b has been worded to support Policy E1A. However, in my view this objection is more related to proposed allocations and omission sites and their effect on the strategy, which I have dealt with elsewhere in this chapter.

4.5.9 I have some concern about B8 uses and have suggested that a criteria based policy should be adopted to give guidance on their acceptability.

4.5.10 Only one of the three criteria remains in revised Policy E1A which has now been amended to be clearer and less restrictive. In my view, this policy in revised form is required which together with Policy E4 will deal with new proposals and extensions to existing employment generating uses.

4.5.11 I share the view, as does the Council that the policy was too restrictive. It has now been revised. However, I have expressed concern about the revised wording in dealing with this topic above, and in my recommendations below. Most small proposals in rural areas are windfall but in any event I do not believe that allocations should be made for small employment sites in rural areas. The Council has now deleted the word “only” from the policy as an Additional Change. The revision not only carries a positive presumption in favour of employment in settlements, it also now carries no negative presumptions about proposals outside of settlements which will be dealt with on the basis of other policies in the Plan. More flexibility has also been introduced by deleting a controversial list of settlements and substituting “defined settlement boundaries.”

MOD site – Aston Down.

4.5.12 As far as the land north of the MOD depot at Aston Down is concerned, it is not

clear how it would be covered by Policy E1A as originally worded or as amended, unless the existing buildings were intended to be used for some B8 use. In my view the site is not adjacent to a settlement and in any event, reference to “adjacent to settlements” has been deleted from the amended version of the policy. The issue is, therefore, whether the site should be allocated in some way, under Proposal 3 or possibly under E1.

4.5.13 The objection site forms part of an airfield and is located about 7.5km from Stroud and 4km to the east of Minchinhampton. The former MOD depot site to the south is at present on the market.

4.5.14 Under Policy ET20 of the draft SDLP 1994 the 3ha of land adjacent to the depot site and the subject of this objection was allocated for business use within Class B1 of the Use Classes Order. Small scale low density business use to a high design specification was encouraged because of the AONB status of the land. When the Plan was first reviewed the site was not allocated for employment use under Proposal 3, or listed as a site where employment would take precedence. However, because of the previous planning permission in outline for 5000sq.m of B1 floor space the site was listed as a commitment in Table 4.2. However, the planning permission expired and a new application was submitted for some 7000 sq.m (later modified to 5000 sq.m covering about 17% of the site area). This new application was refused because of the location of the site in open countryside and because of the environmental impact of the proposal. This was a reversal of the Council’s previous approach to the site.

4.5.15 Under national guidance in Planning Policy Guidance Note 1 it is stated that sustainable development should use already developed areas in the most efficient way, while making them more attractive places in which to live and work, and shape new development patterns in a way which minimise the need to travel. The MOD site is in open countryside poorly related to existing settlements and in an area where public transport is so poor as to be negligible. I would expect any development here to rely on the private car. It is assessed by the objector that some 200 workers would be employed on the site in connection with the B1 use proposed and I consider this level of employment would encourage a significant number of car journeys. The site is not readily accessible by cycle, Minchinhampton is some 4km away and it is unlikely that many would attempt the strenuous journey by cycle from Chalford.

4.5.16 I consider it unlikely that the range of jobs on the objection site, the MOD site and those uses scattered nearby, viz. RDF Technical and Hampton Stone Works would result in any significant change to local bus services, or be sufficient to subsidise them. The creation of jobs here might shorten the journeys of some local residents in Minchinhampton, Chalford and Nailsworth as there are no small scale allocations locally but in my view this would not justify further B1 development in the open countryside.

4.5.17 Furthermore, I do not believe development for B1 use in this location would comply with paragraphs 4.5.3 or 4.5.4 of the Plan. Paragraph 4.5.3 requires most B1 uses to be located in the main towns of the District readily accessible from primary transport routes and facilities. Under paragraph 4.5.4 small scale rural employment may be supported, in or adjacent to villages, with an adequate range of community facilities and public transport service. In my view the proposal would also be contrary to advice in paragraph 41 of Planning Policy Guidance Note 13 and the Council’s attempts to allocate and safeguard sites which are sustainable. I have considered whether there is a shortfall of such allocated sites elsewhere in this Chapter when I deal with the objection to the allocations at Sharpness.

4.5.18 I accept that the use would not cause disruption but this is because of the remoteness of the site. Similarly, because of its location the new development would not bring new life to

any rural community as it would be remote from any settlement. I did not find from my visit that the site had the characteristics of an urban fringe area, it is the remains of a typical airfield in the open countryside.

4.5.19 I do not consider there is any issue on the basis of national guidance about the site being “brownfield”. It is, but it is in an unsustainable location. The objector questioned what the site could be used for. It seems to me that regardless of the lack of allocation in the Plan the site has some existing use rights. I found it to be well served by access to the main road network. Since the site is in open countryside it is one on which any proposal must be dealt with on its individual merits.

4.5.20 I conclude that the site should not be allocated under Proposal 3 for B1 use or be recognised as a key employment site under E1.

4.5.21 Policy E1A has been revised so that, in general, employment development will only be permitted within settlement boundaries. Also large B1 and B8 uses are now specifically dealt with in the policy.

4.5.22 Meadow Mills, Eastington, although small, is important for local employment and a key resource under paragraph 4.7.3. See also Policy E1 below.

4.5.23 National guidance encourages mixed use schemes in certain locations and there is no reason why with good design and layout B1 uses cannot be satisfactorily integrated with housing. I accept that it is more difficult for B2 uses to be so integrated. It would be necessary to ensure that a B2 use is located in such a way that it bears a satisfactory relationship with adjacent uses to avoid unacceptable future conflict. Those factors mentioned by the objector, location, scale and function would be matters for the Council to consider when determining whether a particular proposal could be satisfactorily incorporated into its surroundings.

4.5.24 As the Plan is to be read as a whole, cross-referencing is not required.

4.5.25 The proposed deletion of reference to sites adjacent to settlement boundaries may well be a disadvantage to those putting forward certain omission sites. However, of itself that does not rule out a favourable consideration of such sites..

4.5.26 The issue of B8 uses came out at the Inquiry when Sharpness, Netherhills, and Aston Downs were discussed. I deal with it here because this policy lays down some criteria for large scale storage and distribution uses.

4.5.27 Planning Policy Guidance Note 13 advises that local authorities should, where possible, locate developments generating substantial freight movements such as distribution and warehousing, particularly of bulk goods, away from congested central areas and residential areas, and ensure adequate access to trunk roads.

4.5.28 The Council does not now specify which sites should be used for B1, B2 or B8 uses in the employment policies of the Plan. It seems to me, from my visits, that there are very few sites covered by Policy E1, and none in Proposal E3, (apart from the specialised Sharpness allocation which I have dealt with elsewhere in this report), which are suitable for the larger B8 uses.

4.5.29 From the evidence I do not know what the overall demand is for large B8 uses in the District, but I believe the Council should consider adopting criteria, which would give guidance to prospective B8 developers, as there may well be proposals to extend existing B8 uses. In my view regardless of Policy E4 of the Structure Plan these proposals are more likely to be outside of defined settlements than in them. The new criteria would reflect advice in the supporting text

at paragraph 4.6.9b of the Local Plan and could be added to Policy E1A where some criteria for B8 uses are already listed.

4.5.30 I suggest any policy should include the following criteria:

- a) There is no suitable site within an allocated employment area.
- b) The site is well served by vehicular access and trunk roads and the proposal would not generate traffic, of a type or amount, which would damage the character of local roads.
- c) The proposal would not cause significant harm to the appearance or character of the countryside or to the amenities of local residents.

I have included the words “cause significant harm” in criterion c because any proposal would be likely to cause some harm, but this harm needs to be balanced against the economic and rural employment advantages that would accrue from the development.

RECOMMENDATIONS 4.5

- a) The Council to consider my concerns in paragraph 4.5.2 above.
- b) Modify the policy in accordance with Additional Suggested Change by deleting “only” from the first sentence of the policy.
- c) Include a new policy or revise an existing policy to give guidance on larger B8 uses incorporating criteria a), b) and c) as suggested in paragraph 4.5.30 above.
- d) Otherwise modify in accordance with PRO028

4.6 POLICY E1

The Objections

E01 (W-u-E)/554/2352	Unnamed client
E01/113/0341	Mr Norman Marshall
E01/113/0342	Mr Norman Marshall
E01/176/0433	Renishaw PLC
E01/247/0669	Kings Stanley Parish Council
E01/299/0819-CW	Gloucester City Council
E01/299/3178-CW	Gloucester City Council
E01/300/0827	Eastington Parish Council
E01/344/1105	St Regis Paper Company Ltd
E01/344/1106	St Regis Paper Company Ltd
E01/351/1133	Dursley & District Liberal Democrats
E01/411/1446	Hampton Property Company
E01/414/1492	Critchley Group PLC

E01/434/1795	Nailsworth Town Council
E01/444/1868	Various Clients of Andrew Watton
E01/454/3716	Illingworth Morris Ltd
E01/498/2068	Arab Investments
E01/502/2087	British Waterways
E01/543/2253	Government Office for the South West
E01/6/0174	Olympic Varnish Co Ltd
E01/801/4117	Industrial Sales Limited

Summary of Objections

- (a) Policy is overly restrictive and should identify criteria for assessing alternative uses rather than being prohibitive.
- (b) Employment protection of Brunsdons Yard and Cableways sites under EK6 (Ryeford Industrial Area) should not be restricted to B1, B2 and B8 (industrial) uses.
- (c) The factory now on EK28 is likely to soon become redundant and could be used for retail.
- (d) On EK6, new employment provision must not have an adverse impact on the AONB countryside
- (e) The former MoD sites at Hardwicke and committed sites at Haresfield and Moreton Valence should be protected for warehouse and distribution uses.
- (f) EK2 should not be identified as key employment land in the District. It is more appropriate to be covered under Policy E5.
- (g) Object to the employment protection of Daniels Mill, Cam.
- (h) Objects to statement (in para 4.7.4) that loss of employment land may be acceptable. Loss of Lister Petter employment land is not acceptable as there is not an adequate supply of employment land to meet local needs in Dursley.
- (i) Development of Lister Petter land should be restricted to the boundary of the EK25 designation.
- (j) Object to the employment protection of Mawdsleys, Dursley site.
- (k) There is no need for policies to protect land in its existing use
- (l) Land at Terrett’s factory, Newmarket Road, Nailsworth should be protected for employment use.
- (m) Further sites should be protected under policy E1.
- (n) Protection of the Lodgemore/Fromehall Mill area (EK37) without reference to open space is too stringent. This is a sustainable location and should be regarded as an area for organic growth.
- (o) Object to designation of the Ham Mills area as part of the EK14 key employment land protection.
- (p) The definition of key employment land at Sharpness should allow all uses falling within Use Classes B1, B2 and B8.
- (q) The plan does not include policies for employment development that may be proposed in locations not covered by policies E1 - E9.

- (r) The area of land on which Olympic Varnish and the neighbouring company, Antiquark, operate should be protected as a key employment site.
- (s) There is a need to clarify that redevelopment or changes of use within employment use (B1, B2, B8 and certain Sui Generis uses) will be permitted subject to other plan policies.

Inspector’s Reasoning and Conclusions

4.6.1 As the Council is primarily concerned about the balance between employment generating uses and the avoidance of outward commuting I see no reason why key industrial employment sites should not be protected by a policy such as E1. A number of development plans protect defined sites or include them in Employment Zones. E1 is a similar form of protection. The intention of this policy is to be severely restrictive to avoid the loss of important employment sites, and I would expect the Council to list only those sites that are considered suitable for some form of industrial use. I accept that a criteria-based policy could deal with exceptions but the alternative wording suggested would not be suitable. Government advice is that the word “normally” which has been suggested for inclusion is unnecessary as it would merely be a repetition of the flexibility built into the Act and that any loss from industrial employment use could be dealt with as an exception under Section 54a. Because of the need to give priority to such employment uses, I do not consider this to be unacceptable. Policy E2 allows for flexibility outside of defined sites.

Brunsdon Yard and Cableways

4.6.2 Brunsdon Yard and Cableways are located to the south of the Ebley By Pass. There is also industrial land to the north of the by-pass and the combined Ryeford Industrial Area at Stonehouse is shown protected under Policy E1 as EK6.

4.6.3 The objector considers that the site at Brunsdon Yard should not have been included under Policy E1 as its use does not accord with the definition of employment land under paragraph 4.1.2. I accept on the basis of the evidence that the use is likely to be “sui generis.” However, it also seems to me that the site is well located to be protected as employment land and that all that is necessary to enable the use to be covered by paragraph 4.1.2 is to include “sui generis” uses in the definition. This is the approach taken in other development plans.

4.6.4 It is for the Council to assess on the basis of its studies how the demands for conflicting employment generating uses are met. The Council has identified an industrial base, particularly engineering, as important to the Stroud valleys. Because of this a loss to other types of business use, such as retailing, regardless of the total number of employees, is unlikely to be acceptable, as once lost the only option left is to provide for industrial employment on green field sites. Some of the optional uses mentioned such as a nursery, which in its strictest sense, is an agricultural and rural pursuit; and a garden centre, which tends to be a large specialised retail outlet, would take up valuable industrial land which might be better used for other purposes. It is not clear to me what optional tourism uses are being suggested. Apart from the key employment sites protected under E1 in my view there is only a limited range of new sites allocated under Proposal E3 to meet the needs for employment land during the Plan period. I believe that to make it easier for industrial sites to be redeveloped for other use will restrict the range and quality of industrial sites available, and there is enough flexibility built into Section 54a of the Planning Act to deal with exceptions.

4.6.5 I accept from my visit that both Cableways and Brunsdon Yard appear to provide low density employment and this is a location where industrial use could be intensified to provide greater employment opportunities. The sites are well related to nearby housing areas,

for a source of employees, and have good access to the road network. I see no reason to treat employment uses on the north side and south side of the by-pass differently and conclude that the sites should remain under the protection of Policy E1.

EK28 – Wotton-under-Edge

4.6.6 This site is situated close to the town centre. It is about 1ha in extent and about .6ha of that area is allocated as Employment Land under Policy E1 of the Local Plan. At present the site is occupied by two industrial buildings and a further ancillary 2 storey office building. There is also a parking area and some vacant land. Vehicular access is from Old Town, which runs parallel to the main shopping street, Long Street. There are two pedestrian accesses from Long Street into the site.

4.6.7 The company has concentrated its business activity outside the town at New Mills where the mill has been refurbished. Planning permission was granted to extend the area by some 13ha. I was told that 900 new jobs are to be created and about 50% of them would be filled by ward residents.

4.6.8 It seems to me that local employment can be provided through a range of industrial uses and if a site becomes redundant for one use, then other uses may take its place. Although Policy E2 deals with loss of employment land not protected under Policy E1, no such flexibility is contained in Policy E1. I have dealt with this issue at paragraph 4.6.1 above.

4.6.9 In particular, although EK28 may become surplus to Renishaw’s requirements this does not, of itself, mean that the site will become surplus to industrial employment use. The main factory building is large enough to be adapted to house smaller employment units. The site is conveniently located for employment use. It is closely related to the town centre and to housing areas and although there is no certainty that employees will work close to their homes, a convenient supply of local labour would be available. I accept the Council’s view that the site is the most important of the 3 allocated employment sites in the town, and its loss would be a blow to local employment opportunities. However, I believe there is a balance of conflicting views that need to be considered.

4.6.10 It seems to me from my visits that the site of EK28, or more accurately the enlarged site in the ownership of the objector, is also well located for a modest supermarket and in my view would comply with the sequential guidance in Planning Policy Guidance Note 6. The town is reasonably vibrant but there is a local perception that a modest supermarket is required. The Council has accepted in paragraph 6.13.5 of the Town Centres and Retailing Chapter that there is also a perceived shortage of short term parking. It was agreed at the Inquiry that local residents have to drive to Cam or Yate to the nearest supermarket. There is a Co-operative store in Wotton-under-Edge but it is small and there are no opportunities for expansion. It was said that a unit of about 3800 sq.m (15.000 sq. ft.) could be accommodated on the objection site, and the level of employment generated would be similar to that for the industrial use.

4.6.11 It was argued by the objector that the unemployment level is low and that because of this, and the Renishaw expansion creating 900 jobs, the loss of the objection site would at worst retain the status quo in local employment. I do not give much weight to the unemployment figures, as such, because they do not provide any indication where people work and how much out commuting is involved. Although there can be no direct control over where people work it is the Council’s aim is to provide for more self-containment and to lessen the present trends for workers to travel, by providing more choice of employment in appropriate locations. It seems to me, however, that a form of self containment would also be provided if the objection site were

used for a supermarket, as at present it is necessary for residents to travel some way to a supermarket. By providing the retail facility within the town more people would shop locally.

4.6.12 On the basis of the employment statistics prepared by the Council and regardless of the importance of Renishaw’s to local employment the Council consider there would still be a shortfall of between 500/600 jobs in the South Vale.

4.6.13 In my view, the objection relies on establishing a retail case for the site that outweighs the need for B1 uses. There is little doubt in my mind, that in terms of land use the site is suitable for both retailing and industrial employment. However, there is no omission site objection before me at the Inquiry in respect of the retail use so I am unable to assess in any detail the merits of the site for that use. The Council considers that any proposal for a supermarket could be dealt with as an exception under Section 54a of the Act. It could, but in my view any such proposal would be contrary to the strict wording of Policy E1 and there is no mention in the Town Centres and Retailing Chapter of the need for a supermarket in Wotton-upon-Edge.

4.6.14 I do not share the views of some objectors that Policy E1 should be reworded to provide for more flexibility as the premises listed are key employment sites and their loss would be a significant blow to the Council’s employment policy. Nor am I of the view that EK28 should be taken out of the protection of E1 because regardless of its attraction as a supermarket site, it is also an important employment site. However, I believe that the supporting text of paragraph 6.13.5 should recognise that there may be a need for a supermarket; and improved short term parking in the town. This in my view would be sufficient to point the way to testing the strength of the retail arguments by balancing conflicting evidence between two sustainable uses one against the other having regard to advice in Planning Policy Guidance Notes 4 and 6. Any such assessment would have to take into account the loss of an important employment site against the need for a supermarket; the reduction in the need for local residents to travel elsewhere for their main shopping; and industrial employment versus retail employment having regard to the needs of the locality and the South Vale.

EK2, Meadows Industrial Estate, Eastington

4.6.15 Other policies of the Plan protect amenity and the natural environment from development proposals. This policy is basically concerned with retaining sites to protect industrial employment. The Council would deal with those proposals for a change of use within the industrial classes that require planning permission by having regard to other policies in the Plan.

4.6.16 Paragraph 4.7.3 of the supporting text gives varied reasons why sites have been chosen as key employment sites, and there will obviously be some subjective judgement by the Council about which sites should be included. I have elsewhere in this chapter dealt with a number of suggestions for sites outside of settlements to be given greater protection. From my visit site to EK2, I found the Meadows Industrial Estate at Eastington, although relatively small, appears to be important for local employment. I presume on the basis of paragraph 4.7.3 the Council would include it within the category of providing a key resource for local employment, the protection of which helps to reduce the need to seek new greenfield opportunities for employment uses.

4.6.17 The objector considers that the site should reasonably be safeguarded, presumably by Policy E2, but that its key employment status does not reflect its sensitive location in open countryside and the consequent restrictions on its future use or growth, and its relatively poor

accessibility by public transport. The objections seem to be mainly based on the factor of additional growth, particularly that involving outward expansion, and its impact on the open countryside together with the potential for more car based commuting. However, in reading Policy E1 it merely states that key employment sites will be *retained* as areas where employment needs take precedence, not that they will be permitted to expand. New buildings and extensions to them on a key employment site would be considered on the basis of Policy E4 of the Plan and the adopted criteria would protect the open countryside. If the site were not defined as a key employment site any extension to Meadows Industrial Estate would be dealt with under Policy E5A which in my view has less stringent criteria than Policy E4. In summary, I have no detailed evidence about the importance of EK2 as a key employment site, but in terms of protecting the countryside Policy E4 should do so.

Daniels Mill

4.6.18 I found from my visit that Daniels Mill is well located for industrial employment purposes and if it became surplus to operational requirements I consider that every effort should be made to use it for another industrial purpose. I do not believe the alternative wording suggested by the objector would be appropriate as it does not include the possibility of a different future industrial employment use.

Lister Petter

4.6.19 From my visits to the Lister Petter site I consider it to be well located for a mixed form of development. I agree with some objectors that this is an important employment site and believe the Council has recognised that importance in the master plan prepared for the site. My report on the proposals for this site is in the Dursley chapter of this report.

Mawdsley

4.6.20 Although the Mawdsley Site EK26 would be suitable for housing development in my view the district needs greater employment opportunities. This is an area where there is considerable out commuting to work and if the present adjoining industrial use ceases, both it and the allocated site should be used for other employment generating uses. Once lost to housing such important employment sites can never be regained. There is adequate housing provision for the area during the Plan period.

Various Suggested Sites

4.6.21 A list of suggested sites has been produced for inclusion under the protection of Policy E1. I have dealt with these individually below. It seems to me that in choosing sites to be included under the protection of Policy E1 that the Council has had particular regard to sustainability in that, in general, the sites are within or adjacent to settlement boundaries. I understand that size was not a factor. One objector is concerned about what he considers to be a lack of consistency in selecting the key employment sites.

4.6.22 **Lodgemore Mill/ Fromehall Mill, Cairncross** – This site is already protected as a key employment site under Policy E1 as Site EK37.

4.6.23 **Gordons/Danfoss, Ebley** – I found this site to be set in a straggle of ribbon development between the two settlements of Stroud and Stonehouse but it is close to both. There are two poor vehicular accesses into the site. The buildings on site appear to house a number of small businesses. Although there is a mix of uses some are not “employment” uses as defined in the Plan. It is assessed that the businesses employ some 85/100 people. The Council considers that it in such a vulnerable location between settlements, planning permission

would not be granted for such development today. Intensification of development on the site might be objected to for this reason, because the land beside the river is liable to flooding, and because the site is close to housing. Nevertheless, this is a relatively recent business site and the employment uses on it are unlikely to go away. I do not find the site with its existing uses to be unsuitable for employment use and doubt that some intensification or rationalisation on site would cause harm. However, I do not consider it to be a key employment location. As the site is suitable for employment use it would be protected under E2.

4.6.24 **Lower Mills, Stonehouse** - This site is tucked away at the rear of a residential area and has a poor means of access. It appears to be liable to flooding. There is a patchwork of smaller units on the site which apparently has a fragmented ownership. With these drawbacks I do not consider it could be reasonably defined as a key employment site, although it remains protected under Policy E2.

4.6.25 **Aston Down, Minchinhampton** - I have dealt with an adjoining omission site in detail in this chapter. Many of the issues are the same and I have not repeated the arguments here. In summary, however, I consider this depot site and the sporadically located businesses nearby to be in open countryside. The sites have negligible public transport provision. There is limited opportunity for cycling to the sites and none for pedestrian access. The depot is vacant but it is understood that about 80 workers were employed on site. The depot is up for sale and is likely to be used for a B8 use. I do not believe the depot or the other sites in the area would reasonably comply with criteria in paragraph 4.7.3 of the supporting text for a key employment site. In particular, the sites are not located within a reasonable distance of a settlement boundary and are not sustainable development in terms of public transport or cycling.

4.6.26 **Attwoolls, Whitminster** – This site is situated to the north east of the village. It is apparently occupied by a small family business making, hiring and selling marquees and camping equipment, employing I am told about 80 people. It is close to the village but in my view it does not read as part of the settlement although it is of considerable importance to the village. However, taking the District as a whole I would not consider it to be a key employment site and the existing use in my view is adequately protected by Policy E2.

4.6.27 **Cambridge Road, Slimbridge** – This site, which should not include the football field, is in my view too small and isolated to be included as a key employment site. About 20 persons are employed on this site of a former bakery which is remote from Slimbridge and Cambridge. Its development is not sustainable. I do not believe it compares favourably with EK2 which has a reasonable relationship to Stonehouse, a higher density of employment, and is better served by public transport.

4.6.28 **Other sites suggested for E1 protection** are Terrett’s factory, Newmarket Road, Nailsworth and Olympic Varnish and Antiquark. From my visits I do not consider the former to be a key employment site which would warrant the protection of Policy E1. The latter appears to be run down and according to the Council’s evidence is vulnerable. However, at present the uses have the protection of Policy E2.

4.6.29 It seems to me that as there are a number of constraints on the development of Lodgemore/Fromehill open land, including possible land pollution, poor access and flood risk. Although it is well located I have no evidence before me that there is a likelihood of this land coming forward for development during the Plan period. I agree that the existing site, which is close to housing, is worthy of protection for employment purposes and should remain included under Policy E1.

4.6.30 Ham Mills is close to a residential area and has the potential to provide local employment. Regardless of ownership I see no reason why the land should not be included within the EK14 designation. See my detailed report on Ham Mills in this chapter.

4.6.31 Because of the remote location of Sharpness I do not consider the site would be suitable for B1 uses. Some B2 uses are also likely to be unsuitable. However, to provide for greater flexibility the Council in its revised wording does not specify uses in Proposal E3.

4.6.32 As the objector states, the Plan does not include policies for employment development outside of locations covered by Policies E1 to E9. I have raised this in connection with my consideration of Policy E1A.

4.6.33 Sites are protected because of their industrial employment and not for any particular use, sui generis or otherwise. I do not consider there needs to be a policy which states that changes of use within the employment generating classes would be permitted. Although I accept that a criteria based policy would be suitable I do not consider it necessary. Any such changes of use would be assessed against other policies of the Plan.

RECOMMENDATIONS 4.6

- a) Add “together with “sui generis” industrial uses” after “...B8 uses respectively” in the third sentence of paragraph 4.1.2 in the supporting text.
- b) Modify the supporting text at paragraph 6.13.5 of the Town Centres and Retailing chapter by mentioning the possible need for a supermarket and improved short term parking in the town.

4.7 POLICY E2

The Objections

E02/228/3112	Stroud Town Council
E02/314/0889	Lister Petter Ltd.
E02/409/1388	Buchanan Partnership
E02/409/1389	Buchanan Partnership
E02/411/1447	Hampton Property Company
E02/414/1493	Critchley Group PLC
E02/415/3512	Redrow Homes (SW) Limited
E02/428/1727	Newsquest (Wales & Western)
E02/444/1869	Various Clients of Andrew Watton
E02/444/3658	Various Clients of Andrew Watton
E02/498/3723	Arab Investments
E02/498/3724	Arab Investments

Summary of Objections

- (a) The important resource that small employment sites provide as low-cost premises for seed-bed companies should be reflected in para 4.7.4.
- (b) Major industrial concerns should not be constrained by policy E1.
- (c) When will the review of employment sites be undertaken and will it be public information?
- (d) This policy wrongly presumes that loss of employment land leads to loss of jobs.
- (e) Neither policy nor text gives an indication of how “adequate supply” is to be measured or how “suitable” alternative land will be identified under plan monitor manage.
- (f) Seeking compensatory proposals to replace lost job opportunities is not part of Government policy and seeks to impose obligations that may not be sustainable or achievable.
- (g) Further background information is required on the exceptions to this policy. There are other commercial uses that generate employment that may be acceptable on these sites.
- (h) Object to policy as ability of SDC to refuse all windfall sites is strengthened by the amended Policy.
- (i) The proposed changes make policy E2 too prescriptive and self-defeating. The environmental benefits desired will be too difficult to achieve in practice.

Inspector’s Reasoning and Conclusions

4.7.1 The loss of small sites can make it more difficult for new industries to start up and the Council has now recognised the importance of small employment sites in providing low cost premises for seed-bed companies in paragraph 4.7.4 by Proposed Change PRO030.

4.7.2 This review of employment sites was carried out and was used to back up the policies of the Plan at the Inquiry.

4.7.3 I accept, as does the Council, that loss of employment land of itself may not lead to a loss of jobs. The wording of paragraph 4.7.4a has been amended accordingly.

4.7.4 I see no reason why major industrial concerns should not be covered by a policy such as E1, rather than be covered by a more general policy such as E2. See my report at E1 above.

4.7.5 The Council has recognised the need to revise the supporting text at 4.7.4a to clarify how an adequate supply of land is to be measured and how land suitable for employment purposes will be identified. Proposed Change PRO031 refers.

4.7.6 Policy E2 is criteria based and as revised does give some flexibility when redevelopment of employment land is proposed, as only one or more of the criteria needs to be met. I agree with the Objector that criterion 3 would probably rarely be achievable as the owner of the proposal site would also have to control suitable other land. I consider that criterion 3 could best be included in the supporting text as an indication of one way of achieving the provision of more employment land. It seems to me that criterion 1, of itself, would ensure that there is an adequate supply of employment land to meet local needs, regardless of whether it is already in existence or whether it is provided as part of a redevelopment scheme.

4.7.7 Although Policy E2 does seek to introduce a presumption against the loss of sites to alternative uses it would only be necessary for the owner/occupier to demonstrate the lack of

suitability of the site against one or more of the criteria. I have recommended that Criterion 3 be moved into the supporting text, as I believe the issue is better included for consideration under Criterion 1 relating to supply of land, and also because it would be very unlikely that an owner could provide alternative new industrial land. Where would it come from other than through the Local Plan process? It would be for the Council to determine in the first instance whether there is an adequate supply of employment land under Criterion 1 to meet local needs on the basis of its research and to justify any decision on the issue. I have dealt with the environment criterion at paragraph 4.7.12 below. Turning to Criterion 4 I agree with the objector that this would mainly apply to mixed-use schemes. Presumably the Council would be looking for an intensification of industrial development to ensure that more jobs are created than would be lost, otherwise the mix of uses might be unacceptable.

4.7.8 I do not find the phrase “where the site is no longer suitable for employment use” to be too vague. Of necessity the policy needs to be flexible because although a site might no longer be suitable for one employment use, this does not mean that it would not be suitable for another. The phrase also accepts that some sites, either because of poor accessibility or because of older premises, even with adaptation, would no longer be viable for modern industry. This is now stated in the supporting text at paragraph 4.7.4. As to the adequacy of employment land I am satisfied from the evidence that the Council has carried out the research necessary to come to a reasonable conclusion on the matter.

4.7.9 Commercial uses other than business or industry that generate employment may be acceptable on these sites having regard to Policy E2. However, the Council recognises in paragraph 4.1.2 that other activities such as retailing are significant employment generators. These are mainly dealt elsewhere in the Plan.

4.7.10 One of the fundamental platforms of employment policy in the Plan is to retain a balance between employment and housing to reduce commuting. Because of this I consider that a strict policy is necessary to ensure that industrial employment land which is still required for that purpose is not lost to higher value housing without good reason. I believe it unrealistic to expect Policy E1, which deals with *key* employment sites, to be the sole means of protecting business and industrial sites. I doubt that the Council would have the resources to survey every site in detail and come to conclusions about its future. Each proposal would need to be dealt with on its own merits, but on the basis that employment land should not be lost unnecessarily. The loss of an individual site, of itself, may cause little harm but the cumulative effect of such losses over the years can be significant. Policy E2 provides some protection. Only one or more of the listed criteria in the policy need to be met and I believe there is enough flexibility in the revised wording to paragraphs 4.7.4 and 4.7.4a. of the supporting text to indicate how the issues will be balanced. In my view, without a Policy such as E2, employment land could be too easily lost to housing. I do not share the view of one objector that the policy would impose unnecessary restraints on reusing employment land. I saw some of the sites listed by an objector but did not inspect them in any detail. Two of the sites identified are already allocated for some future housing, and their loss from employment use has been accepted.

4.7.11 The objector considers that Policy E2 precludes the proper use of windfall opportunities. It seems to me that by their very nature “windfall” sites are unexpected and unplanned and need to be judged against some criteria such as those in Policy E2. It was suggested, that if Policy E1 were to be strengthened by encompassing more sites then Policy E2 would be unnecessary. I doubt that this approach is practical in that Policy E1A is not intended to cover all employment sites, but merely those key sites that meet the criteria listed in paragraph 4.7.3 of the Local Plan.

4.7.12 As only one or more of the listed criteria needs to be met I do not consider the policy to be too prescriptive. In my view the impacts of a “non-conforming” use on the environment are often readily apparent, as are the benefits of change. I consider the environmental criterion should remain in the policy.

RECOMMENDATIONS 4.7

- a) The Council to include criterion 3 of the policy in the supporting text instead, as suggested in paragraph 4.7.6 above.
- b) Otherwise modify the supporting text in accordance with Proposed Changes PRO030 and PRO031.

4.8 GENERAL OBJECTIONS TO PROPOSAL E3

The Objections

E03 (N/S)/543/2247	Government Office for the South West
E03 (N/S)/606/2613	Mr & Mrs Hillier
E03/362/1207	Colthrop Farm Limited
E03/408/1358	Hardwicke Court Estate
E03/412/1465	Crest Strategic Projects Limited
E03/413/1469	Barratt Bristol Ltd
E03/415/3513	Redrow Homes (SW) Limited
E03/429/1743-CW	Gloucestershire Wildlife Trust
E03/443/3626-CW	English Nature
E03/444/1870	Various Clients of Andrew Watton
E03/502/2089	British Waterways
E03/502/2090	British Waterways
E03/502/3731	British Waterways
E03/543/2246	Government Office for the South West
E03/543/2248	Government Office for the South West
E03/543/3754	Government Office for the South West
E03/578/3862	The House Builders Federation
E03/63/0262	Louise Townsend
E03/796/4084	Stinchcombe Parish Council
E03/801/4104	Industrial Sales Limited

Summary of Objections

- (a) Should reconsider the allocation at Sharpness Dock.

- (b) The employment land within the Hunt’s Grove mixed use allocation should not be constrained to only B1 uses.
- (c) Object to employment land allocation at Hunt’s Grove, Hardwicke as part of the mixed use allocation. (i.e Objects to HG)
- (d) Further allocations of employment land are needed in the Stroud/Stonehouse area if the strategy of the Structure Plan and the Local Plan is to be delivered.
- (e) There is inconsistency among the allocated sites in the obligations being sought.
- (f) Last line of 4.8.2a recognises that matters may arise in the consideration of future applications and lead to obligations. Suggests that this is reflected in Policy.
- (g) The list of sites in this policy is incomplete. Committed employment sites should be included. Query the inclusion of land at Hunt’s Grove and at Sharpness. Further land needs to be allocated to make up for these sites not coming forward.
- (h) Refute the suggestion that Sharpness Docks may not be suitable for development due to the failure to attract new industry to the area in the last 20 years. Suggest that the allocation made is insufficient and request an expansion of the employment allocations
- (i) Object to planning obligations associated with employment allocations EA3 - 6 at Sharpness.
- (j) The proposal should be redrafted to set out adequate guidance and safeguards in respect of B1 development which reflects its traffic/trip generation characteristics.
- (k) The LPA should reconsider the employment allocation at Wotton-Under-Edge.
- (l) Clarify that travel intensive uses, such as offices, will not be developed on inappropriate sites.
- (m) The references to obligations do not provide certainty about the intent of the policy or what factors will be used in the determination of a planning application.
- (n) Seeking planning obligations is incompatible with PPG12 and does not accord with Circular 1/97. Proposal E3 is verbose, over-elaborate, and too detailed.
- (o) The land at Hope Mill Lane, allocated in the Local Plan for housing, should be allocated for employment.
- (p) The meaning of the amended text (RLP) in 4.8.1 is unclear.
- (q) Object to requirement for planning obligations for off-site highway works (re site EA2?).

Inspector’s Reasoning and Conclusions

4.8.1 I agree that although it is a remote site because of its unique location there are opportunities at Sharpness for selected industrial uses which should be encouraged. There has been little new development attracted to the docks over recent years. Although releasing more land might help with the expansion of individual firms already operating from the area, I do not believe the site suggested to the north west of EA6, which is within the Old Dock Conservation Area is suitable for industrial development generally, although I understand that there is consideration being given to its use for waste disposal, and the Waste Local Plan may demonstrate an over-riding need to secure appropriate waste management facilities. See my more detailed report in respect of Sharpness at EA3 to EA6 below.

4.8.2 Objections in respect of Hunts Grove have been dealt with elsewhere in the Strategy and Housing Chapters.

4.8.3 It was argued at Inquiry that allocations at Sharpness and at Renishaws distort the employment figures. The former because it provides for about a quarter of allocations and the latter because it will mainly serve the needs of localised employment at Wotton. Objectors consider more land needs to be allocated at Stonehouse.

4.8.4 Although I accept there is some distortion, particularly as because of its location Sharpness is only suitable for B2 and B8 uses, it seems to me that, on the basis of the evidence of the Council, the Stonehouse area, of itself, is well served by industry. Table 4.2 shows there were 10.2 ha with planning permission for employment use in 2001. Under Proposal E3 another 18.6 ha are allocated for employment use. Also there are four key employment sites identified in Stonehouse under Policy E1. In my view Stonehouse already provides for a significant range of employment land in a sustainable location.

4.8.5 I consider there will inevitably be some inconsistency about obligations which might be sought because the need for some would depend on matters as yet unidentified which can only be considered when specific proposals are submitted. The last line of the policy is proposed to be changed (Proposed Change PRO033) to make clear that “provisions” (rather than “obligations”) will be sought through negotiation.

4.8.6 If sites are committed they are no longer proposals and in my view should not be included on the Proposals Map. Hunts Grove and Sharpness are dealt with elsewhere in the Plan. Hunts Grove in the Strategy and Housing Chapters and Sharpness when dealing with EA3 to EA6 below. Objector’s views that other sites should be allocated have also been dealt with separately in this report.

4.8.7 The sites at Sharpness are remote from centres of population. I have accepted when dealing with Sites EA3 to EA6 below that development should be encouraged at the docks to make better use of the port and its rail and canal links. I do not consider it would be unreasonable of the Council to negotiate an obligation to improve public transport and access to the area, to make that development more sustainable. It seems to me that the phrase “from the anticipated employment catchment area” is a vague term. The actual catchment area would only be known after development has taken place, unless a guidance figure can be extrapolated from where the employees already working there live. If such a figure is not available I believe the phrase should be deleted. As the sites are likely to be developed by businesses with a low density of employment, any provisions under Proposal E3 will have a limited impact on their operation and the sustainability of the development.

4.8.8 New Policy E1A and its supporting text provides guidance on the location of large scale B1 uses. See my views and recommendations on the wording of that policy.

4.8.9 This objection appears to relate to the Renishaw site which I understand now has the benefit of planning permission accompanied by a legal agreement. It is now a committed site and no longer a proposal for me to consider. I have reported on the Renishaw Old Town site when considering EK28 under Policy E1.

4.8.10 In my view Policy E1A and Policy T1 in the Transport Chapter, adequately deal with suitable locations for travel intensive uses.

4.8.11 I agree that this policy does not lay down criteria which will be used for development control purposes in the determination of planning applications. However, new Policy E1A does provide some guidance and policies in other chapters lay down criteria on

transport and to protect the environment.

4.8.12 The wording of the policy is now that “legal agreements will be sought or conditions used” to secure planning provisions. These planning provisions are listed. Circular 1/97 advises that where a proposed development would, if implemented, create a need for particular facilities or would have a damaging impact on the environment or local amenity, or would adversely affect national or local policies, and these matters cannot be satisfactorily be resolved through the use of planning conditions, it will usually be reasonable for planning obligations to be sought or offered to overcome these difficulties. Also developers may reasonably be expected to pay for or contribute to the cost of infrastructure which would not have been necessary but for their development. I believe it would be helpful to those reading the Plan that the Council has identified those matters likely to be the subject of future negotiation. In my view the provisions listed are relevant to planning. They would appear to be necessary. Whether they would be reasonably related in scale to the development could only be determined on the submission of a particular proposal.

4.8.13 The Hope Mill Lane site is close to existing employment generating uses within the Stroud Industrial Conservation Area. In my view it is suited to both housing development and industry. However, the Council has to balance the housing need against that of employment and has concluded that priority should be given to the provision of houses on this vacant site. From the evidence the Council has allocated and safeguarded sufficient employment land within the Stroud valleys.

4.8.14 It seems to me that as the Highway Authority has already identified a need for improvements and if the site is expanded it would be reasonable to include a statement in the policy to this effect. This would make it clear to those interested in the site that an obligation would be sought.

4.8.15 Paragraph 4.8.1 has been clarified. See my report on EA3 to EA6 on Sharpness below.

RECOMMENDATIONS 4.8

- 1) Modify Policy E3 in accordance with Proposed Change PRO033
- 2) Delete “from the anticipated employment catchment area” from EA3 Provisions.

4.9 PROPOSAL E3 - SITE EA1

The Objections

E03 (EA1)/1/0113-CW	Gloucestershire County Council
E03 (EA1)/157/0401	Cam Parish Council
E03 (EA1)/338/1073	D R Palser
E03 (EA1)/360/1199	Mr & Mrs D B Evans

E03 (EA1)/361/1201	Cheltenham Builders Ltd
E03 (EA1)/367/1221	Mrs J M Brown
E03 (EA1)/438/1821	Mrs Hopkinson
E03 (EA1)/440/1830	Clarke Willmott & Clarke

Summary of Objections

- (a) Add obligations (re highways/transport) to EA1
- (b) The allocation is too big and on a greenfield site.
- (c) Object to the allocation in entirety.
- (d) Object to deletion of site EA1 from proposal E3 in RLP
- (e) The allocation should be increased by 5.5 hectares
- (f) It is proposed that a further 14 hectares of land be allocated adjacent to this site for complementary housing development to form a mixed use development.

Proposed Changes

E03 (EA1)/PRO033/361/6016/CO Cheltenham Builders Limited

Summary of Objections

- (a) Constraints imposed on this allocation are too severe and don’t accord with PPG 12.
- (b) The 80% barrier relating to site MU3 is an unknown quantum, is not phased and may not be achieved in the plan period thus stifling development of EA1. This may be detrimental to local employment prospects.
- (c) The size and configuration of EK23 may not meet needs of incoming businesses by itself. This may deter inward investment.

Inspector’s Reasoning and Conclusions

4.9.1 Contributions to off site works would need to be on the basis of national guidance. However, the rewording clearly shows the range of improvements that the Council and the Highway Authority would be seeking on any development of the site. This provides guidance to the owner or developer

4.9.2 From its studies the Council has identified an imbalance between job opportunities and the local workforce. There has been a reduction in the availability of local jobs in Cam and Dursley and this has encouraged outward commuting. In my view the proposed site, which is well related to an existing industrial estate, housing and local transport is of a size and location to encourage new industry. Provision for the needs of modern employment on a reasonable scale is inevitably going to involve some incursion on to green field sites, as existing outdated and smaller industrial sites are rarely suitable for modern industry on any scale, although they may well be suitable as start up units. See also my report on the Lister-Petter site in the Dursley Chapter of this report (MU3). With regard to the 80% barrier relating to allocation MU3, the Council has acknowledged that this is not adequately quantified. The Council suggested that it should be reviewed, but by the close of the inquiry had offered no further suggestion. If a suitable quantification cannot be found, I suggest that the limit be abandoned as unworkable. However, I will have to leave the Council to reconsider the options.

4.9.3 From my visit to site EA1 and site EA1A I find that the impact on the countryside from the development of them would be about the same. However, to my mind EA1 is a far more logical site for employment generating uses than EA1A. Site EA1 is located immediately adjacent to an existing industrial site and access can be obtained through it to serve the new site. It would consolidate industrial uses in one location, would be marginally closer to the station and the use would have no impact on the amenities of local residents.

4.9.4 The need for additional housing land in Cam and Dursley has been considered in the Housing Chapter.

4.9.5 There are conflicting views about whether the site is too large or too small. I doubt from the Council’s evidence that the site could be smaller during the plan period, particularly having regard to my concern about the restrictions imposed upon it relative to the Lister-Petter site MU3.

4.9.6 The site at the roundabout of the A38 and the A4135 has been suggested as an alternative for industry. There are already small business premises here but a significant area of good agricultural land would need to be taken up to provide an industrial site of the required size. Such development would be an intrusion into open countryside remote from any settlement and contrary to sustainable development principles of national guidance and the Local Plan.

RECOMMENDATION 4.9

Modify the Plan by implementing Proposed Change PRO033 in respect of the reinstatement of allocation EA1. Reconsider the 80% limit with relating to employment development on allocation MU3.

4.10 PROPOSAL E3 - SITE EA1A

The Objections

See Appendix 1 – Chapter 4 Appendix

Summary of Objections

- (a) Wording of proposal is inconsistent with equivalent proposal in H1. Potential exists for planning obligations to exclude issues (i.e. those relating to biodiversity) that are not listed.
- (b) Comprehensive list of planning gain appears too simplistic for the various sites.
- (c) The substitution of the former housing allocation with an employment allocation is not part of a balanced strategy.

- (d) The reason for changing housing allocation Hg2 to employment allocation EA1A at Cam is unclear. The sites potential for housing should be retained. The original employment allocation east of Draycott Mills Industrial Estate was logical.
- (e) The vehicular access to the site is restricted.
- (f) Traffic generation in terms of cars and HGV’s would
 - lead to congestion.
 - create road safety dangers for pedestrians
 - create unacceptable noise and air pollution
- (g) Road infrastructure is insufficient to cope with extra traffic
- (h) Brownfield land should be used ahead of greenfield land
- (i) It would harm the landscape
- (j) Land should remain in agricultural use
- (k) Site is valuable as a wildlife habitat
- (l) Development would endanger protected species
- (m) There are archaeological remains on the site
- (n) It would have an adverse affect on the character of Cam
- (o) Industry would create noise and smell problems
- (p) It is too close to houses
- (q) The fields are used by the public for informal leisure – dog walking, children’s play
- (r) The land floods
- (s) Development would require new drainage infrastructure
- (t) More suitable land for employment exists at and adjacent to Draycott Mills Industrial Estate
- (u) No need for this scale of industry in the area
- (v) Doesn’t assist expansion plans of nearby employers

Inspector’s Reasoning and Conclusions

4.10.1 The Council has reinstated site EA1 to employment use, following the large number of objections to site EA1A. Although a number of the objections above could be overcome I do not consider that site EA1A is as suitable for employment use as site EA1. My reasons and conclusions are stated in dealing with site EA1.

RECOMMENDATION 4.10

Modify the Plan by implementing Proposed Change PRO033 in respect of the deletion of allocation EA1A.

4.11 PROPOSAL E3 - SITE EA2

The Objections

E03 (EA2)/1/0168 Gloucestershire County Council
E03 (EA2)/300/0828 Eastington Parish Council

Summary of Objections

- (a) Delete this allocation as it is remote from residential settlements and bus services are relatively infrequent.
- (b) Provision should be made within this policy for the developers to contribute to off-site highway improvements.

Inspector’s Reasoning and Conclusions

4.11.1 Although Meadow Mill is not within the village I did not find it remote from the settlement of Eastington. It is close to a recognised cycle route along the Stroudwater Canal and I understand that there was an hourly bus service linking Stroud, Stonehouse and Dursley but that there is now a 20 minute bus service between Stroud and Uley. The nearest bus stop is about 10 minutes walk away. The site is well linked by road to both Stroud and Stonehouse. The present vehicular access is poor and well below current highway standards. However, the access is capable of improvement to aid visibility and safety which is a development control matter. The inclusion of this site would extend a small free-standing industrial estate. It could provide a range of small units and greater opportunity for local employment. I consider it to be a reasonably sustainable location.

RECOMMENDATION 4.11

Make no modification to the Plan in response to this objection.

4.12 PROPOSAL E3 - SITE MU1

The Objections

E03 (MU1)/543/2249 Government Office for the South West

Summary of Objections

- (a) This employment allocation is inappropriate as part of a mixed use development in a wholly inappropriate location for major development.
- (b) Objects to the B1 employment use proposed at Hunts Grove as it is likely to encourage travel by car, contrary to PPG13.

Inspector’s Reasoning and Conclusions

4.12.1 This site is dealt with under MU1 in the Housing chapter of this report.

RECOMMENDATION 4.12

Make no modification to the Plan in response to this objection.

4.13 PROPOSAL E3 – SITES EA3, EA4, EA5, EA6

The Objections

E03 (EA3)/415/1507	Redrow Homes (SW) Limited
E03 (EA3)/502/2091-CW	British Waterways
E03 (EA3)/502/2092	British Waterways
E03 (EA3)/556/2396	J S Bloor (Newbury) Ltd
E03 (EA3)/558/2428	Robert Hitchins Limited
E03 (EA4)/221/0514	Mrs Ford
E03 (EA4)/415/1508	Redrow Homes (SW) Limited
E03 (EA4)/556/2397	J S Bloor (Newbury) Ltd
E03 (EA4)/558/2429	Robert Hitchins Limited
E03 (EA5)/415/1509	Redrow Homes (SW) Limited
E03 (EA5)/556/2398	J S Bloor (Newbury) Ltd
E03 (EA5)/558/2430	Robert Hitchins Limited
E03 (EA6)/221/0515	Mrs Ford
E03 (EA6)/415/1510	Redrow Homes (SW) Limited
E03 (EA6)/556/2399	J S Bloor (Newbury) Ltd
E03 (EA6)/558/2431	Robert Hitchins Limited

Summary of Objections

- (a) The allocation of employment land at Sharpness is unsustainable.
- (b) This location is unattractive for major commercial development, remote from main centres of population and inaccessible from the principal road network.
- (c) Allocation EA6 is also covered by a key wildlife site designation and it disrupts the links between the key wildlife site and the Sharpness Docks Conservation Area.
- (d) The former ‘camp site’ at Sharpness Docks and adjacent land west of the canal channel should be allocated as employment land.

- (e) Extend the employment allocation EA3 at Sharpness Docks to include further land to the north west.
- (f) Objects to white buildings on sites EA4 and EA6 as the reflected glare from them is severe.

Inspector’s Reasoning and Conclusions

4.13.1 The port of Sharpness lies on the west bank of the River Severn. It has reasonable access to the primary road network, the A38 and to the motorway junctions 13 and 14 of the M5. The Berkeley and Sharpness bypass improved road links and relieved adjacent settlements of HGV traffic. At the time of the Inquiry siting there was a current public consultation exercise on further proposals for road improvements.

4.13.2 Land at Sharpness has a long history of allocations. Firstly, in the 1989 South Vale Local Plan, 4 sites were allocated to a total of 31.27 ha. Of these sites one was partially developed, S1 which had a total area of 10.93 ha, of which 2.7ha was used for the construction of a factory for Steamline Building Products; S2 of some 15.7ha was fully developed as a plasterboard factory; S3 of 3.84ha and S4 .80ha remain undeveloped. Unfortunately because of the recession at the end of the 1980’s which severely hit the building industry, Streamline Building Products closed and the gypsum factory never fully operated. Trade through the docks slowed down.

4.13.3 In the 1994 draft Local Plan the Council considered that there was still potential for industrial growth. The importance of the port was recognised in the Structure Plan. New allocations were added to previous allocations, an extra 9.11ha making a total of 18.98 ha.

4.13.4 Although there has been little take up of land in the past at Sharpness I believe there are significant differences now. The former gypsum factory is now a distribution centre operated by the Howard Tenens Group and this company is looking to expand its facilities. The Streamline factory is now a transfer station and treatment centre for waste materials. The private sector Victoria Wharf Group has now taken over the running of the port from British Waterways. There has been a considerable improvement in the trading position of the port and the government is currently allocating funds to improve canals and encourage their use. There are about 300 persons employed in the area.

4.13.5 Site EA3 lies outside of the defined port area. It is vacant land. Further land used for field study purposes was added to the allocation making an area of 9.2ha. This revised figure has been included under a Proposed Change PRO033 (CDL5). Both EA4 and EA5 are shown within the defined port area. EA4 has been reduced to 2.8ha as a warehouse has been constructed on part of the site since this Plan was originally prepared. This is also shown in Proposed Change PRO033(CD/L5). EA5 is a grassed area and from the plan appears to be the site of former railway sidings. There is a small maintenance building on it of some 300 sq.m. Half of EA6 was a former housing site and the other half an overgrown area again formerly railway sidings. The key wildlife designation on EA6 was deleted following advice from the Gloucester Wildlife Trust. The total area of all of the above allocated sites is now some 19.4ha

4.13.6 The County Council has allocated a 3ha site for a waste management facility in its Revised Deposit Waste Local Plan. This covers part of EA3. A larger facility has been promoted at the docks and the report of the Inquiry into the Waste Local Plan has now been issued. Its findings in respect of land area need to be incorporated into the Plan.

4.13.7 I was told that there might be interest in developing a triangle of unallocated land to the east of EA5, but this is not an omission site before me.

4.13.8 One objector considers that as waste disposal is a separate allocation it should not count towards the employment allocation. I do not see the logic of this approach. Regardless of the nature of the use providing employment, on the ground it will result in jobs benefiting the district.

4.13.9 It is questioned whether there is any necessity to allocate some of the land because in the past it had been employment land. With an established use it would not be appropriate to allocate. From my visit there is little indication that the sites were developed although they may well have been many years ago but, in any event allocation is appropriate.

4.13.10 Although somewhat isolated, in my view Sharpness is unique within Stroud District. I share the view of the objector that the site is more unique than strategic. It is of little regional importance. It is however, the only site that can be served by rail and water and Planning Policy Guidance Note 13 supports development requiring substantial freight movement away from residential areas, where they have adequate access to trunk roads and can be served by rail or water transport. Both RPG 10 and the Gloucestershire Structure Plan encourage and give priority to locations served by wharves, harbours or railway sidings. Reinstating rail links has been the subject of discussions and would be a straightforward exercise because the necessary infrastructure is in place. There is a rail link to Gloucester – Bristol main line. There is also a commercial canal link to Gloucester and the River Severn.

4.13.11 Because of its location and hinterland employees would be drawn from a wide area and Sharpness would be unsuitable for higher density employment uses such as B1, but would be suited to B2 and particularly B8 uses which normally have a low density of employment. The docks are remote from housing and it would be unrealistic to expect local housing to be provided to serve these low-density employment uses. These storage and distribution uses are unlikely to significantly increase traffic to and from the port. At present Sharpness is predominantly a road based port but railhead facilities are not used to capacity.

4.13.12 Regardless of these shortcomings, with the interest in waste recycling, improved throughput to the port, and the Howard Tenens Group looking to expand on to an adjoining site, it seems to me that significant changes are in the offing. These could well result in much of the potential of Sharpness being realised during the Plan period. I accept that there are more popular and more sustainable locations in the district, particularly for B1, and for some B2 uses, but from my visits I found very few sites suited to the larger B8 type uses. I do not, therefore, agree with the objector that the sites at Sharpness should not count as part of the 100 ha employment provision set out in the Structure Plan at Policy E1. I do, however, note that the Sharpness allocations account for about a quarter of all allocations in the Plan for the District during the Plan period. I have dealt with the adequacy of the overall allocation when dealing with omission sites.

4.13.13 I conclude that Sharpness would be sustainable for a limited range of employment uses and that growth is a realistic prospect. The sites should not be deleted from the Plan.

4.13.14 The detailed design and external appearance of any new buildings are a matter for the day to day development control process and should not be included in the Local Plan

RECOMMENDATIONS 4.13

- a) Make no modifications to the Plan in response to these objections but modify Proposal E3 in accordance with Proposed Change PRO033 and the supporting text at paragraph 4.8.1 by the change proposed in evidence to the Inquiry which inserts after “Priority will be given” the words “for employment uses” at these sites.....”

- b) Revise the Proposals Map to accord with the Waste Local Plan.

4.14 PROPOSAL E3 - SITE EA7

The Objections

E03 (EA7)/469/2024 Mr Frost

Summary of Objections

- (a) Objects to the extent of the employment allocation EA7.

Inspector’s Reasoning and Conclusions

4.14.1 This was a problem of indicating the site boundaries clearly on the Proposals Map. The Council has confirmed in its evidence that regardless of the thickness of the boundary line, the western boundary of this allocation lies parallel to the adjoining west boundary, 51m away.

RECOMMENDATION 4.14

Make no modification to the Plan in response to this objection but modify in accordance with Proposed Change PRO033.

4.15 PROPOSAL E3 - SITE EA8

The Objections

E03 (EA8)/307/0855 Christopher Dunn
E03 (EA8)/341/1090-CW Kingswood Parish Council
E03 (EA8)/415/1511 Redrow Homes (SW) Limited

Summary of Objections

- (a) This employment allocation is on greenfield land, is too big for the area and will destroy Kingswood’s rural separateness.
- (b) The size and boundaries of this allocation require proper identification since previous documents published by the District Council are at variance to those details included in the plan.
- (c) The scale of this allocation should be reduced to ensure that its scale and impact is appropriate to the location in transport and environmental terms.

Inspector’s Reasoning and Conclusions

4.15.1 Time appears to have determined the extent of this site as planning permission has

now been granted for an extension to the business. This site will no doubt be deleted from the Plan as an allocation. As a commitment it will be recorded in Table 4.2.

4.15.2 The objector considers the gross site area of EA8 should be reduced to a net figure of about 4 ha because of the low density developed proposed on the Renishaw site. If reduced to a net figure the corollary to the argument would be that more land should be allocated elsewhere within the district to allow for flexibility in the form of over supply on the basis of Structure Plan employment requirements.

4.15.3 I find the suggestion that because a site is developed at low density that only part of it should be allocated as employment land to be a somewhat whimsical approach. Taking this same argument further would mean that the allocated sites at Sharpness and other B2 and B8 uses elsewhere, where there is a low density of employment, should similarly be reduced to a net allocation. How the net figure would be determined without a detailed application I am not sure. Even though the scheme for Renishaw’s which is for some 18,500 sq.m, creating some 900 new jobs, has been the subject of an application, from the layout which was submitted to me I consider it would not be realistic to determine where employment land ends and some other category begins.

4.15.4 It seems to me that there are two aspects of employment allocation and the total of the site areas in itself is only a crude guide to employment potential. The critical issue in the end is the number of jobs created of the right kind and in the right place. From the evidence the Council is well aware of the employment densities of various types of business uses. I accept that there can be tenuous links between the allocation of sites and job creation and there is no certainty that an allocated site will yield a certain number of jobs. On the other hand many jobs are created on sites which are not allocated for employment as such. There are also sites with planning permission yet to be developed. This means that any empirically arrived at statistics based on land allocation can only be an estimate. All the Council can do in this situation is to monitor the employment figures to assess whether its attempts to reverse the trend for outward commuting are working. However, with all these uncertainties I see no reason to reduce site areas to a net figure.

RECOMMENDATION 4.15

Modify the Plan to take into account the changed status of this site under Proposed Change PRO029.

4.16 PROPOSAL E3 - SITES EA9, EA10, EA11

The Objections

E03 (EA9)/542/2237

Stonehouse Town Council

E03 (EA10)/542/2238	Stonehouse Town Council
E03 (EA11)/415/1512	Redrow Homes (SW) Limited
E03 (EA11)/542/2239	Stonehouse Town Council

Summary of Objections

- (a) The allocations EA9 and EA10 should be deleted.
- (b) Object to the employment allocation at ABB Kent, Stonehouse – no reason
- (c) Objects to allocation EA11 as it is too close to residential property, it has poor access and it is more suited to housing if incorporated with adjoining properties.

Inspector’s Reasoning and Conclusions

4.16.1 From my visit to the area I found these sites in close proximity to Stroud and Stonehouse suitable for industrial use to meet local needs for the Stroud Valleys area. On the basis of the Council’s policy to attempt to provide a self-contained employment base to cut down on commuting to work outside the District the proposed sites are a logical choice to achieve that aim. There are a few residential properties fairly close but they are already close to industrial premises and it is unlikely new employment development would have a significant effect on them. Moreover, other policies in the plan protect amenity. The area is served by an hourly bus service and is close to the cycle route connecting Stroud to Stonehouse.

4.16.2 No specific reason is given for this objection to EA11. Presumably it is because of the relationship with existing houses. The site would be a logical extension of an existing industrial area with access through an industrial site.

RECOMMENDATION 4.16

Make no modifications to the Plan in response to these objections but otherwise modify in accordance with Proposed Change PRO033.

4.17 PROPOSAL E3 - SITE EA12

The Objections

E03 (EA12)/498/2067	Arab Investments
E03 (EA12)/498/3722	Arab Investments

Summary of Objections

- (a) The Ham Mills area, part of the EK14 key employment land protection, should be designated as ‘employment land’ only, similar to the southern part of the same ownership, (I.e. employment allocation EA12)

- (b) Object to planning obligations on site EA12. The site has a number of constraints and its viability is questionable.

Inspector’s Reasoning and Conclusions

4.17.1 The Ham Mills site, of some 3.2 ha, is at present vacant. It is situated in the Frome valley and contains redundant industrial buildings. The Mill itself is listed Grade 11. There is otherwise a mixture of buildings in brick, asbestos and corrugated steel together with an open parking area, an open grassed area and an area of undergrowth. There are two vehicular accesses into the site. The site lies within the Stroud Industrial Heritage Conservation Area. Opposite the site on the other side of the A419 there are houses, but to the north and south, interspersed with a few houses, is industrial development. On the site is a blue tin chapel, All Saints

4.17.2 In 1997 an application for 36 dwellings on the site was refused and dismissed on appeal. One of the reasons for dismissal was that the Inspector considered that the proposed residential character of the appeal site would be quite alien to the well established land use pattern with its respective locations of industrial and residential development. The Inspector also found that the proposal would also be incompatible with the scale and character of the existing employment development in the area, and would be contrary to advice in Planning Policy Guidance Note 24, because of unreasonable levels of noise and disturbances from adjoining industrial uses.

4.17.3 At the Local Plan Inquiry two plans were referred to. Option A which shows the existing mill building converted to residential use and housing to the north of that building. The remainder of the site is devoted to B1/B2 units. Option B shows the existing mill building converted to a B1 office use, and the remainder of the site in residential use. In each option the chapel building would be retained.

4.17.4 In my view, in the valleys, where industrial land once lost will never be regained, it is essential that employment uses take priority over housing. Some of the industrial buildings might be obsolete but I do not believe the historic character is. Also the site lies between a busy road, the railway and primarily industrial development, factors that influenced the previous Inspector when she made her appeal decision. Taking into account the prevalent industrial character of the area, I believe the site to be far better suited for industry than housing, both visually and having regard to the peaceful enjoyment of their amenities by any future housing residents.

4.17.5 Although Planning Policy Guidance Note 1 advises that mixed-use schemes can create vitality and can be more sustainable than a single use, any such schemes also need to fit in and be complementary to their surroundings. It is evident from the two Options A and B that mixed use can either mean mainly housing development with very little industry, or mainly industry with some housing. I consider the first to be completely unacceptable for the reasons given in paragraph 4.17.5 above. As to the second, I do not believe that housing development here would have a satisfactory relationship with adjoining industry, and the only reason for a mixed use scheme with limited housing would be to pump prime development, if industry did not eventually take place without it. Although the site is vacant, other vacant premises in the locality have gradually been taken up for industry without the need for mixed-use schemes, including the Phoenix Trading Estate adjoining, which I understand now operates 7 days a week.

4.17.6 The objector argues that retention of the whole site for employment uses will frustrate the objectives of establishing an appropriate use of the listed mill, and of the redundant

chapel building, the enhancement of the site and the provision of a better access. There is, however, no substantial evidence to back up this assertion. Where the Council has considered pump priming by housing to be necessary, or desirable, sites have been omitted from Proposal E3. The objector considers there is a risk that the site may not be developed, but it is for the Council under its Plan, Monitor and Manage programme to review the Plan to ensure that changes are introduced if necessary.

4.17.7 It seems to me that the best use of the site would be to accommodate a high density of B1 uses, and the site is large enough to fund the improvements which would need to be an integral part of any development. Some financial assistance might be required to renovate the chapel, but the listed mill would need to be refurbished regardless of its future use. When the appeal was previously dismissed the Inspector commented that no marketing of the site had been pursued for an employment use, and up to the time of the Local Plan Inquiry no such exercise had taken place. Subsequently, the premises were marketed over a period of 12 months without success. However, in my view the results of the exercise are not conclusive. The exercise highlights a continuing requirement for industrial accommodation, albeit the interest being mainly in new build and in the acquisition of the freehold. This is not available if the buildings are rented as they are, but Scheme A produced for the site by the objector’s consultant shows that redevelopment of part of the site would be a practical approach to modernisation.

4.17.8 I accept the view that the aspirations of the owners are a factor in determining when and if development takes place, but if those aspirations include a significant element of housing, I consider they are misguided.

RECOMMENDATION 4.17

Make no modification to the Plan in response to these objections.

4.18 PROPOSAL E3 - OMISSION SITE OS204

The Objections

E03 (OS204)/338/1074 D R Palser

Summary of Objections

- (a) Any additional land required for employment should be found along the A38 rather than at Draycott, Cam.

Inspector’s Reasoning and Conclusions

4.18.1 As I have stated above when dealing with land to the east of Draycott Mills industrial estate, the site bears a satisfactory relationship with the town and existing industry. I

consider its allocation should remain. The vacant land to the south of the estate is already protected for employment use under EK23 as planning permission has been granted for B1 use.

4.18.2 No specific site has been suggested by the objector, but to locate B1 uses out in the country would be contrary to the policy on sustainable development.

RECOMMENDATION 4.18

Make no modifications to the Plan in response to this objection.

4.19 PROPOSAL E3 - OMISSION SITE OS205

The Objections

E03 (OS205)/438/1822 Mrs Hopkinson

Summary of Objections

(a) Employment land would be better on the A38 than east of Draycott Mills Industrial Estate.

Inspector’s Reasoning and Conclusions

4.19.1 See 4.18 above

RECOMMENDATION 4.19

Make no modification to the Plan in response to this objection.

4.20 PROPOSAL E3 - OMISSION SITE OS206

The Objections

E03 (OS206)/338/1075 D R Palser

Summary of Objections

(a) Any additional land required for employment should be found along the A38 rather than at Draycott, Cam.

Inspector’s Reasoning and Conclusions

4.20.1 See 4.18 above

RECOMMENDATION 4.20

Make no modification to the Plan in response to this objection.

4.21 PROPOSAL E3 - OMISSION SITE OS207

The Objections

E03 (OS207)/474/2030 Mr R Dickenson

Summary of Objections

(a) Land at the former airfield, Moreton Valence should be allocated for employment use.

Inspector’s Reasoning and Conclusions

4.21.1 This site is about 14.5 ha but about half of it is in use and could not be classified as new employment land. The rest of the site is in agricultural use. From my visit I saw this to be a site in open countryside and poorly served by public transport. It is not within or adjacent to any settlement. The small village of Whitminster is closest at about 2.5km to the south and Hardwicke about 4km away. There are small industrial premises at Whitminster. Because of its location Hardwicke appears to be mainly served by opportunities for employment in Gloucester. This remote site would not be sustainable for industrial use, particularly B1. The site may be suitable for some form of B8 use as it is close to the junction of the M5 only about some 3km away. However, other sites have been allocated for B8 use in the Plan. See my report at 4.5 above, where I consider the need for a policy to deal with proposals for B8 storage and distribution.

RECOMMENDATION 4.21

Make no modifications to the Plan in response to this objection.

4.22 PROPOSAL E3 - OMISSION SITE OS208

The Objections

E03 (OS208)/339/1077

Moreton C Cullimore (Gravels) Ltd

Summary of Objections

- (a) Eleven hectares of land at Netherhills Depot, Frampton-on-Severn should be allocated for employment.

Inspector’s Reasoning and Conclusions

4.22.1 I found from my visit that this depot site is in an isolated location in open countryside remote from any settlement. It is about 3km from Eastington and Frampton which are both served by small industrial estates. The site is very well served by access to the A38 and the junction of the M5 is close at some 3km away. The land is not in the AONB. The established employment uses on site include a haulage contractor, offices and vehicle workshops, a HGV parking area and warehousing for drainage contractors, a local millers and pallet storage and distribution, and a dwelling. The site is poorly served by public transport.

4.22.2 I accept that a previous mineral extraction site can by definition in national guidance be a “brownfield” site. However, I doubt that such definition would apply in this case, as although the site has not been reinstated to a standard which would be accepted today, it was presumably reinstated in accordance with an old planning permission through development control procedures as defined in Annexe C of Planning Policy Guidance Note 3 – Housing. Regardless of whether it is a brownfield site, which I doubt, this does not make it suitable for redevelopment.

4.22.3 The Council brought to my attention that the site is shown in the Gloucester Waste Plan. on Map RD22 (CD/55). This gives an indication that the County considers it to be an appropriate and preferred location for waste disposal, or presumably as there is no land left to fill, a recycling facility, an employment use which is often located in the countryside.

4.22.4 The objector considers that identified sites in Proposal E3, and in particular Sharpness, may not have the advantages of this omission site for B2 and B8 uses, and the proposed site would provide a valuable addition to much needed employment uses close to Stroud, Cam and Dursley in an area with high unemployment. I do not share the view of the objector that high unemployment is an issue in that the Council’s evidence, which was not effectively challenged, clearly shows that unemployment levels are low and the main issue is concern about outward commuting to jobs. I have dealt with Sharpness separately elsewhere in this chapter..

4.22.5 The major part of the site is already recognised in Table 4.2 as a site with planning permission for employment use. As much of the site is already in employment use for B2 and B8 uses and as this is not new employment land in my view it would not be appropriate to allocate it as such. The area of land without an established existing use for industrial use is small and located at the south eastern end of the site. It seems to me that regardless of whether any proposal for expansion on to this adjoining land would be for a number of small firms or one large firm that the traffic impact would be about the same, although the visual impact might be different. In any event such proposals could be dealt with under Policy E5A, and the existing uses on the remainder of the site are protected by Policy E2.

4.22.6 An alternative would be to recognise this omission site as a key employment site

under Policy E1 but in my view such recognition would not be in accordance with paragraph 4.7.3 of the Local Plan or with Policy E4 of the Structure Plan. Most of the key sites are within or adjacent to settlement boundaries and are sustainable, being well located in relation to the main labour market and providing good opportunities for a short journey to work.

4.22.7 I conclude that for the reasons stated in paragraph 4.22.5 above that it would not be appropriate to allocate this site, which is mainly already in industrial employment use.

RECOMMENDATION 4.22

Make no modification to the Plan in response to this objection.

4.23 PROPOSAL E3 - OMISSION SITE OS216

The Objections

E03 (OS216)/471/2027

Mrs M Prout

Summary of Objections

(a) Land at Bridgend, Stonehouse is proposed for commercial development

Inspector’s Reasoning and Conclusions

4.23.1 This is a small site adjacent to the river Frome. I understand from the indicative flood plain map produced by the Environment Agency that much of the land is liable to flooding. I share the view of the Objector that its use for agriculture would not be viable. It is remote from the remainder of the land holding.

4.23.2 Regardless of the planning permission granted for its improvement in 1986 the site has a very poor access, which is unsuitable for heavy vehicles. It seems to me that having regard to the restricted area which might be suitable for development, combined with the very costly remedial works required to bring the road up to a reasonable standard, the proposed allocation would not be realistic or viable. The site is close to housing and is within the Stroud Industrial Heritage Conservation Area. I believe that the site bears a satisfactory relationship with established development patterns and if development did occur a degree of openness would be retained. However, with the restraints mentioned above, on balance, I do not consider the site is suitable for allocation.

RECOMMENDATION 4.23

Make no modifications to the Plan in response to this objection.

4.24 POLICY E4

The Objections

E04/1/3006	Gloucestershire County Council
E04/339/1078	Moreton C Cullimore (Gravels) Ltd
E04/362/3335	Colthrop Farm Limited
E04/412/3448	Crest Strategic Projects Limited
E04/444/1871	Various Clients of Andrew Watton
E04/444/3659	Various Clients of Andrew Watton
E04/543/3755	Government Office for the South West
E04/801/4116	Industrial Sales Limited

Summary of Objections

- (a) An additional criterion should be added to this policy re transport.
- (b) The policy should be amended to allow development of sites that suitably relate to existing development, can be landscaped so as not to form an intrusion into the countryside and can reduce the propensity for out-commuting or to increased travel.
- (c) Object to reference that new residential development should not sterilise employment expansion potential.
- (d) The first criterion is too subjective. A more qualitative and quantitative explanation is required.
- (e) Should allow for expansion of sites beyond the settlement boundary.
- (f) The justification is not apparent for allowing large scale developments, or those considered to have significant impacts on the transport network, to be located where they would be easily accessible by a range of transport modes
- (g) Development for employment purposes may be appropriate in locations other than defined settlements or key employment sites.

Inspector’s Reasoning and Conclusions

4.24.1 The policies in the transport Chapter are comprehensive and as the Plan needs to be read as a whole, I see no need to repeat transport criteria in this policy, other than those mentioned in Criterion 2.

4.24.2 As the wording of the policy has been revised as indicated in Proposed Change PRO036 (CD/L5) to allow for development adjacent to defined settlements I believe the basic objection has been met. I do not find “appear as an intrusion” in Criterion 1 to be ambiguous and find it more flexible than merely stating “the development would be an intrusion in open countryside”. To my mind the latter infers that if development were an intrusion, regardless of its impact, it would be resisted, whereas the wording of the adopted criterion accepts than an

intrusion may occur in fact, but such intrusion might be acceptable, depending on its impact and appearance.

4.24.3 The objectors are also concerned about this policy in relation to key employment sites and consider that if Policies E1 and E2 remain the wording of Policy E4 should be changed. It seems to me, however, regardless of which sites are listed in Policy E1, or the sites protected by Policy E2, that Policy E4 stands on its own as a reasonable basis for considering extensions within defined settlement boundaries, or adjacent to them, or on key employment sites. Outside of such areas in my view Policy EA5 lays down reasonable criteria to consider development proposals for extensions to existing employment uses in open countryside.

4.24.4 The Council has amended the text (PRO034) to clarify that the statement relates to the impact of new housing on the expansion of employment uses within existing sites. With this revision to paragraph 4.9.1 of the supporting text I consider the wording to be acceptable.

4.24.5 The policy, as revised in the Proposed Changes Document (PRO035 and PRO036, CD/L5), now allows for expansion adjacent to defined settlements.

4.24.6 Large scale developments are now dealt with under criteria in Policy E1A. The Council has accepted that certain B8 uses may need to be located close to the main road network.

4.24.7 This policy only deals with the extension of existing employment uses within or adjacent to defined settlements, or on key employment sites. I see no reason to include additional criteria in Policy E4 as the Council accepts that extensions to businesses in the open countryside may be appropriate and these are dealt with by revised Policy E5A. Large scale B8 uses are dealt with under Policy E1A.

RECOMMENDATION 4.24

Make no modifications to the Plan in response to these objections but modify the supporting text in accordance with Proposed Changes PRO034, PRO035 and PRO036.

4.25 POLICY E5

The Objections

E05/331/1019	National Farmers Union, South West Region
E05/332/1039	Painswick Valley Group
E05/354/1150	The National Trust
E05/410/1431-CW	CPRE - Berkeley Vale
E05/410/1432-CW	CPRE - Berkeley Vale
E05/424/1572	Stroud & Gloucestershire Green Party

E05/424/1574	Stroud & Gloucestershire Green Party
E05/444/1872	Various Clients of Andrew Watton
E05/502/2093	British Waterways
E05/543/2250	Government Office for the South West

Summary of Objections

- (a) Item 3 of this policy will be too onerous if there are not already adequate public transport facilities.
- (b) It is unlikely that any new building for employment use could be appropriate in Painswick as it would impinge on residential areas and the AONB.
- (c) Object to provision for employment uses adjacent to settlement boundaries.
- (d) Employment will be required for at least 10,000 people. Closely monitored employment targets should be set in parallel to housing completions to prevent more commuting.
- (e) Noise pollution must be considered before permissions are given. Also new buildings for employment uses must integrate visually into a rural environment.
- (f) Add item 4 to the policy --- “ they are businesses dealing with socially and environmentally acceptable materials.”
- (g) Add a supporting sentence to encourage cultural industries e.g. craft workshops.
- (h) Further settlements should be subject to this policy.
- (i) It prohibits the re-use of existing buildings for new employment use outside of settlements. Concerned that redundant canal side buildings will fall foul of this omission.
- (j) The LPA should reconsider policy against the potential transport effects of B1, B2 and B8 uses within the rural areas.

Inspector’s Reasoning and Conclusions

4.25.1 As this policy has been deleted from the Plan it is no longer a proposal and I have not dealt with objections to it. I have dealt with objections to the new policies which replace it elsewhere in this Chapter.

RECOMMENDATION 4.25

Make no modifications to the Plan in response to these objections.

4.26 POLICY E5A

The Objections

E05A/1/3007	Gloucestershire County Council
E05A/308/3196	Ministry of Agriculture Fisheries and Food (MAFF)
E05A/333/3258	Painswick and District Conservation Society
E05A/395/3373	Miss A Webb
E05A/400/3383	Mr & Mrs S Adams
E05A/444/3660	Various Clients of Andrew Watton
E05A/475/3717	Nigel Cant
E05A/543/3756	Government Office for the South West
E05A/574/3836	CPRE Stroud Branch

Summary of Objections

- (a) An additional criterion should be added to this policy re transport.
- (b) Subsection 2 of the policy may have the effect of splitting a business up and having two different locations.
- (c) Reference to the potential visual impact and traffic generation of proposals should be included in the policy.
- (d) There is inconsistency in restricting growth of new employment enterprises outside defined settlement boundaries to those associated with farm operations. This ignores the importance of local premises for new business start ups.
- (e) Ability to extend sites as described will not always be within the settlement boundary. Should allow for expansion of sites beyond the settlement boundary.. Also, the more comprehensive list in the original E5 was more helpful.
- (f) Policy provision relating to alternative buildings or sites within or adjacent to settlements in the area should be struck out, so should reference in 4.10.2a.
- (g) Major employment development and activities attracting a significant numbers of trips should not be located in rural areas. Consider policy against the potential transport effects of B1, B2 and B8 uses within the rural areas.
- (h) The policy fails to incorporate details of the statement at para 4.10.2a. i.e. unacceptable impact by traffic generation or visual effects.

Inspector’s Reasoning and Conclusions

4.26.1 The Plan is to be read as a whole. The transport policies and criteria are contained in the Transport Chapter. There is no need to repeat them.

4.26.2 Criterion 2 might have the effect of splitting a business up and having two separate locations. However, I do not believe that it can be assumed that just because a business exists in the countryside that there is any automatic right for it to expand. The Council’s aims are, as far as possible, to direct development to sustainable locations and to protect the countryside from intrusion. The Council has amended the supporting text (PRO037) to state that the needs of the business will be balanced against other planning considerations.

4.26.3 Both the visual impact of development and its traffic generation are dealt with by policies contained elsewhere in the Plan, namely the Transport and Natural Environment Chapters.

4.26.4 I do not believe the conversion of existing buildings to business use has been ignored as it is specifically dealt with by Policy B15 in the Built Environment Chapter.

4.26.5 Policy E5A now deals only with existing businesses in the countryside and not those within settlements. Policy E4 would be used to assess new development within settlements. Policy E1A, as revised by Proposed Change PRO028, which also deals with development within defined settlements, is more flexible than before. Settlements are not listed, so the policy would apply to all settlements so defined, and criteria 2 and 3 have been deleted, leaving only criterion 1 to be met to ensure that business development can be satisfactorily integrated into the community. See my report regarding the wording of Policy E1A above.

4.26.6 Criterion 2 of Policy E5A is of particular concern to objectors as the word “area” is considered too wide and could relate to the whole district. The Council’s awareness of alternative buildings or sites is also questioned. In my experience, Councils have comprehensive information about the availability of industrial premises and sites and I do not consider the criterion 2 would difficult to administer. I accept that if the term “area” were to be interpreted as “district wide” this would be unreasonable, but if an alternative building or site were so far away from an existing business it could not be construed as being “suitable” as required by the criterion. I do not have strong feelings about it, but perhaps “vicinity” or “locality” might be preferable to “area”. Otherwise I do not find the suggested alternative wording to be any improvement on what the Council has proposed as it seems to attempt to mix together matters better dealt with by Policy E4 and Policy E5A separately.

4.26.7 The Council’s first preference for business development would be to direct it towards settlements or allocated employment sites. I see no reason why this preference should not be clearly stated. See also paragraph 4.26.2 above.

4.26.8 Major employment traffic generators would be dealt with under new Policy E1A which specifically refers to travel intensive uses, and Policy T1 in the Transport Chapter.

RECOMMENDATIONS 4.26

- a) Modify the supporting text at paragraph 4.10.2a in accordance with Proposed Change PRO037.
- b) The Council to consider whether either the word “vicinity” or “locality” should be substituted for “area” in criterion 2.

4.27 POLICY E6

The Objections

E06/1/3008
E06/211/0499

Gloucestershire County Council
Gloucester Animal Feeds

Stroud District Local Plan – Inspector’s Report

E06/308/0859	Ministry of Agriculture Fisheries and Food (MAFF)
E06/308/0860	Ministry of Agriculture Fisheries and Food (MAFF)
E06/320/0952	Country Land & Business Association
E06/320/3211	Country Land & Business Association
E06/331/1020	National Farmers Union, South West Region
E06/333/1043	Painswick and District Conservation Society
E06/333/3257	Painswick and District Conservation Society
E06/395/3374	Miss A Webb
E06/400/3384	Mr & Mrs S Adams
E06/409/1390	Buchanan Partnership
E06/409/1391	Buchanan Partnership
E06/444/1873-CW	Various Clients of Andrew Watton
E06/502/2094-CW	British Waterways
E06/543/2251	Government Office for the South West
E06/574/3837	CPRE Stroud Branch
E06/577/2509	NHS Executive South West
E06/796/4086	Stinchcombe Parish Council

Summary of Objections

- (a) Policy E6 does not accurately reflect adopted Structure Plan policy E.4.
- (b) This policy should also allow for the expansion of existing businesses subject to the criteria set out in the policy.
- (c) Object to the lack of a farm diversification policy.
- (d) This policy does not allow for development essential to meet the needs of agriculture, forestry and horticulture.
- (e) Object to the restriction of small-scale employment development to within or adjacent to villages.
- (f) It would be helpful to mention farm shops in this policy.
- (g) Item 4 of this policy should more closely reflect PPG7. E.g. “the development should respect and where possible enhance the environment in its location, scale and design.”
- (h) This policy needs to be considered in conjunction with policy B15 which will allow such uses in specified circumstances.
- (i) Farm based developments should be subject to the same environmental criteria as any other employment premises and should include reference to traffic and visual impact.
- (j) Inconsistency in restricting growth of new employment enterprises in areas outside defined settlement boundaries to those associated with farm operations. This ignores the importance of local premises for new business start ups.
- (k) The criteria presuppose that public transport is adequate and provides a choice of destinations and that the times of services are suitable . This restricts the supply of rural jobs in the District.
- (l) This policy is unduly restrictive and contrary to the text on homeworking. Traffic generation from such uses is unlikely to be significant.
- (m) The description is too restrictive and should be made more flexible

- (n) Object to this policy as it prohibits the re-use of existing buildings for new employment use outside of settlements. Concerned that redundant canal side buildings will fall foul of this omission.
- (o) The policy is inconsistent with PPG7, which seeks to promote farm-based diversification. The policy should be redrafted to set out a policy for diversification-related development, taking account of the guidance in PPG7 Annex C.
- (p) Some farm buildings can have an adverse effect on the landscape. Better safeguarding of the landscape would be provided by reinstatement of the final line of clause 3.
- (q) This policy should be cross-referenced to policy B15 concerning re-use of buildings in the countryside.
- (r) The removal of consideration of impact on the landscape of farm diversification schemes is unacceptable.

Inspector’s Reasoning and Conclusions

4.27.1 Policy E6 has been revised in the Revised Deposit draft of the Plan, so that it now relates to farm-based enterprises. I consider it reasonably reflects Policy E4 of the Structure Plan. It also seems to me, having regard to the wording of Policy E4 of the Structure Plan, that development in the “open countryside” could in Stroud District often relate to land that is adjacent to villages, as such land provides an important visual open setting for the settlements.

4.27.2 I consider that new Policy E5A now allows for the reasonable expansion of rural businesses.

4.27.3 Policy E6 has now been revised to deal with farm diversification. Essential development for the purposes of agriculture, forestry and agriculture would be dealt with on its own merits having regard to the provisions of the Town and Country Planning (General Permitted Development) Order.

4.27.4 I believe that Policy E5A gives adequate flexibility for the expansion of existing rural businesses in what is mainly an area of sensitive landscape.

4.27.5 I see no reason to specifically mention farm shops as they would be included under the description of farm based enterprises.

4.27.6 Other policies of the Plan deal with environmental impact and design issues. I do not consider they need to be repeated here.

4.27.7 The wording of Policy E6 has been revised and a cross-reference has also been made to Policies B15 and B16 in the supporting text regarding the conversion of buildings.

4.27.8 Farm based enterprises would be assessed on the basis of the Plan as a whole. This would include policies in the Transport Chapter and the Built Environment Chapter.

4.27.9 Policy B15 deals with the re-use and adaptation of buildings in rural area and does not restrict new employment enterprises to those associated with farm operations.

4.27.10 I do not consider that Policy E6 as revised, or new Policy E6A, presupposes that public transport is adequate or inadequate. This would be assessed with reference to policies in the Transport Chapter and to Policy B15.

4.27.11 This policy has been amended and a new policy inserted to deal with small-scale rural employment opportunities. In my view these provide adequate flexibility for home

working, particularly as many forms of home working do not require specific planning permission.

4.27.12 The policy has now been made more flexible to allow farm diversification and a new policy added to allow for extensions to rural businesses. I believe between them and Policy B15 there is enough flexibility built into the Plan.

4.27.13 This policy as revised does not prohibit the re-use of existing buildings outside of settlements. However, proposals to use redundant canal side buildings would be considered under the criteria in Policy B15 and other relevant policies of the Plan.

4.27.14 The revised Policy E6 now allows for farm diversification and takes into account advice in Planning Policy Guidance Note 7.

4.27.15 The safeguarding of the landscape would be considered under the Built Environment Chapter of the Plan.

4.27.16 The Plan is to be read as a whole. The impact of development on the landscape would be dealt with by policies in the Natural Environment Chapter of the Plan

RECOMMENDATION 4.27

Make no modifications to the Plan in response to these objections.

4.28 PARAGRAPH 4.11.

The Objections

Emp/para. 4.11.0./343/1101 Orange Personal Communications Services Ltd

Summary of Objections

(a) Home based working should be supported through a specific policy

Inspector’s Reasoning and Conclusions

4.28.1 A policy on Home Based Working would need to lay down criteria against which a proposal could be assessed. A statement of support is of itself not a policy. I understand that more people are working from home but in many cases as no change of use has taken place planning permission is not be required.

RECOMMENDATION 4.28

Make no modification to the Plan in response to this objection.

4.29 PARAGRAPH 4.12.

The Objections

Emp/para. 4.12.0./354/1183 The National Trust

Summary of Objections

- (a) An additional policy should require all larger (tourism related) proposals to be accompanied by an Environmental Impact Statement.

Inspector’s Reasoning and Conclusions

4.29.1 In assessing the significance of tourism development, the visual impact, impacts on ecosystems and traffic generation are the key considerations. On the basis of indicative thresholds in Circular 2/99 which identify Schedule 2 development, an EIA is only likely to be required for major tourism development, which requires a site of more than 10 ha. Also in determining whether significant effects are likely, the location of a development is of crucial importance. I do not consider that a policy requiring all larger tourism proposals to be accompanied by an EIA would reasonably reflect the Regulations.

RECOMMENDATION 4.29

Make no modification to the Plan in response to this objection.

4.30 POLICY E7

The Objections

E07/1/0139-CW	Gloucestershire County Council
E07/308/0858	Ministry of Agriculture Fisheries and Food (MAFF)
E07/331/1021	National Farmers Union, South West Region
E07/354/1151	The National Trust

Stroud District Local Plan – Inspector’s Report

E07/410/1434-CW	CPRE - Berkeley Vale
E07/444/1874	Various Clients of Andrew Watton
E07/499/2075	The Company of the Proprietors of the Stroudwater

Summary of Objections

- (a) It is not clear on what basis smaller developments are excluded from the provisions of proposed criterion 3. The criterion should be re-worded.
- (b) There is no reference to small-scale farm based tourism in Section 4.12. Does policy E7 include farm based tourism?
- (c) The wording of item 2 is too wide.
- (d) The emphasis of the policy on the availability of adequate public transport should not be applied in rural areas.
- (e) Would like to strengthen criterion 3 and add further criteria re support for local economy.
- (f) Concerned that tourist attractions are firmly controlled to reduce the impact of the car and to prevent exploitation and over-commercialisation that would be detrimental to the surrounding area.
- (g) The policy and supporting text is too restrictive. All aspects of tourism should be covered and landmark buildings encouraged.
- (h) Should acknowledge that the restoration of the Stroudwater and the Thames and Severn Canals will be a boost and added attraction for tourism.

Inspector’s Reasoning and Conclusions

4.30.1 Policy E7 was been deleted in the revised deposit draft version of the Plan, and replaced by a more comprehensive policy. See Policy E7A below.

RECOMMENDATION 4.30

Make no modification to the Plan in response to these objections.

4.31 POLICY E7A

The Objections

E07A/1/3009	Gloucestershire County Council
E07A/308/3204	Ministry of Agriculture Fisheries and Food (MAFF)
E07A/333/3256	Painswick and District Conservation Society
E07A/409/3416	Buchanan Partnership

E07A/475/3718
E07A/543/3758
E07A/574/3838

Nigel Cant
Government Office for the South West
CPRE Stroud Branch

Summary of Objections

- (a) An additional criterion should be added to this policy re access by public transport, walking and cycling.
- (b) The use of term ‘redundant building’ in paragraph 4.12.5 is contrary to the advice in PPG7.
- (c) Object to the omission of reference to the AONB given that it is likely that most tourist attractions lie within the AONB.
- (d) Policy is inconsistent, confusing tourist attraction with accommodation. Tourist accommodation cannot relate to criteria 1 or 3.
- (e) Extend Policy to include the provision of holiday cottages that are new build or conversion of existing traditional rural buildings.
- (f) Criterion should be included to take account of the scale and likely trip generation characteristics of development.
- (g) Other polices should deal with the consideration of “no significant element of retail or residential development”.
- (h) Development of tourist facilities in the Cotswold AONB must be carefully and sensitively controlled to safeguard the quality of the landscape.

Inspector’s Reasoning and Conclusions

4.31.1 The Plan is to be read as a whole. Policies dealing with the varied means of transport, and the acceptability or otherwise of development in relation to them are contained in the Transport Chapter.

4.31.2 The term “redundant” is proposed to be deleted from paragraph 4.12.5 of the reasoned justification, in Proposed Change PRO038, to conform to advice in Planning Policy Guidance Note 7 – I support this change.

4.31.3 On first reading this policy, which includes both tourist facilities and tourist accommodation, I considered it could be separated into two separate policies. However, I can see why the Council has intentionally grouped together tourism under one policy as it avoids repetition. Criterion 1 clearly relates to visitor attractions because it says so, Criterion 2 relates to both facilities and accommodation. As Criterion 3 refers to residential development and not residential accommodation I do not find it confusing. Criterion 4 would also clearly apply to both tourist attractions and tourist accommodation. On balance I believe that combining the two elements in one policy is acceptable.

4.31.4 Although other policies might deal peripherally with the retail or residential elements of a scheme the Council has identified a particular problem in dealing with visitor attractions within its area, (that have been used as an excuse for attempting to develop land for housing and/or retail use). I therefore see no overriding reason why the criterion should not be included as it advises anyone reading the Plan that a proposal including a significant element of retailing and housing is unlikely to be acceptable.

4.31.5 Policy E7A as written deals with tourist accommodation and I see no need to

mention holiday cottages in particular. Conversion of existing buildings is already covered by Policy B15 and this is mentioned in the supporting text at paragraph 4.12.5.

4.31.6 The objectors consider criteria 3 and 4 should be deleted as such matters are dealt with elsewhere in the Plan. In my view Policy S12 which is clearly a shopping policy and not directly related to tourism, could not take the place of the criteria. I believe Criteria 3 and 4 combined adequately reflect the concerns of the Council about the scale of tourism proposals and the impact of the elements contained within them. Although concern has been expressed about the word “significant” in criterion 3, I do not consider it is possible to avoid some subjective judgement when a detailed proposal for tourism is considered. I believe an alternative wording which included the word “ancillary” would be less satisfactory, in that on a large tourism development “ancillary” could include residential development and retailing to a larger scale than would be acceptable outside of settlements.

4.31.7 The AONB is protected by policies contained in the Natural Environment Chapter of the Plan.

RECOMMENDATION 4.31

Make no modifications to the Policy in response to these objections but modify the supporting text at paragraph 4.12.5 in accordance with PRP038.

4.32 POLICY E8

The Objections

E08/1/0141-CW	Gloucestershire County Council
E08/354/1153	The National Trust
E08/444/1875-CW	Various Clients of Andrew Watton
E08/543/2252	Government Office for the South West
E08/559/2462	Walker Stuart

Summary of Objections

- (a) The scale of hotels should correspond to the size of the settlement in which they are located. It is also important for hotels to be accessible by non-car modes of transport.
- (b) Objects to proposal to allow hotels on the edge of settlements. This is contrary to the reasons for having a boundary.
- (c) The policy and supporting text is too restrictive. All aspects of tourism should be covered and landmark buildings encouraged
- (d) Redraft to take account of the scale and likely trip generation characteristics of hotel development.

- (e) No mention is made in this policy of opportunities to retain and adapt traditional obsolete agricultural buildings for tourist accommodation and associated facilities.

Inspector’s Reasoning and Conclusions

4.32.1 This policy has been deleted in the Revised Deposit draft of the Plan, and new Policy E7A introduced. Trip generation and transport issues will be dealt with under revised Policy T1.

4.32.2 All aspects of tourism are now dealt with by one Policy E7A. This policy is worded in a positive way to encourage tourism facilities, but also includes criteria which ensure that proposals would be compatible with the area in which they are located. The impact of tourist related development on the setting of a town, village or settlement would be one factor to be taken into account. The transport aspects of such development would be dealt with under revised Policy T1.

4.32.3 The conversion of existing buildings in rural areas is already considered on the basis of other policies in the Plan, and in particular Policy B15 which is mentioned in the supporting text at paragraph 4.12.7. Also the new Policy E7A includes development proposals which might involve the change of use of an existing building.

RECOMMENDATION 4.32

Make no modifications to the Plan in response to these objections.

4.33 POLICY E9 AND E9A

The Objections

E09/298/0786	CTC Right to Ride Network
E09/331/1022	National Farmers Union, South West Region
E09/354/1154	The National Trust
E09/354/1156	The National Trust
E09/409/1393-CW	Buchanan Partnership
E09/444/1876	Various Clients of Andrew Watton
E09/693/3966	C & J Grace
E09A/574/3839	CPRE Stroud Branch
E09A/693/3965	C & J Grace

Summary of Objections

- (a) Suggests adding ‘camping barns’, to the list of holiday accommodation covered by this policy.

- (b) There is great demand for overnight accommodation for touring caravans. It is not always possible or appropriate to landscape between plots, around boundaries and screen a site.
- (c) Would like some changes to the policy to reduce the impact of such developments.
- (d) ‘Small scale’ in paragraph 4.12.7 should be defined as between 5 - 10 pitches in order to reduce the impact of such developments on the environment.
- (e) It is a contradiction that camping/caravan sites should be located to avoid the need to enter settlements but should be within or adjacent settlements.
- (f) The policy and supporting text is too restrictive. All aspects of tourism should be covered. The policy should be split to provide for both small and large sites. There is a market for both kinds of operation.
- (g) Object to final sentence of the paragraph as it is not appropriate to consider holiday caravans in this way.
- (h) The Cotswold AONB should be given protection against the development of unsightly caravan and camping sites.
- (i) Policy E9A will effectively prohibit creation of any static caravan holiday accommodation as sites in defined settlements are not appropriate and would be too expensive.

Inspector’s Reasoning and Conclusions

4.33.1 In the Revised Deposit Plan, Policy E9 was deleted and Policy E9A substituted for it. This dealt with the majority of objections to that policy. I deal here with remaining objections to both.

4.33.2 “Camping barns” as I know them are converted buildings in the countryside. Such conversions are already covered under Policy B15, which is referred to in paragraph 4.10.2b.

4.33.3 I accept there is likely to be a considerable demand for overnight accommodation within the district. However, a balance has to be struck between the demand and the impact on the countryside. The district consists of some very attractive countryside and I consider that the wording of Policy E9A provides for its reasonable protection. To help integrate development into the landscape some planting is more often than not necessary.

4.33.4 “Small scale” camping and caravan sites have now been defined in paragraph 4.12.7 in the manner sought by the Objector, and I consider the amendments now accord with revised Policy E9A. The latest version of the policy does not restrict “small scale” sites to those in or adjacent to settlements. The requirement is that they should have good access to a principal road network and local services.

4.33.5 The Council has an adopted Tourism Strategy which is supportive of the industry. Paragraph 4.12.7 has been amended to accord with revised Policy E9A, and together I consider that they provide sufficient flexibility for smaller camping and caravan sites.

4.33.6 The Council agrees with the objector about holiday caravans and I consider the revised wording of the policy and supporting text (PRO039 and PRO040) makes it clear that the restrictive policy is in respect of residential caravan sites only and not static holiday sites. However, I do not believe that the statement at the end of the policy about “static residential caravan sites”, viz: mobile homes, should be a part of the policy itself, as such permanent proposals would be dealt with in the Housing Chapter of the Plan. It is already mentioned in the supporting text at paragraph at 4.12.7. The word “static” is unnecessary. If the statement about

static caravan sites is deleted from the policy the word “touring” should be replaced by “holiday” in the first line of the policy, as it is intended to cover both static and touring caravan sites. I see no need to mention “residential houseboats” in Policy E9A as it deals with the need for small scale camping and caravans sites. I do not consider houseboats would reasonably fall within that definition.

4.33.7 I do not consider it necessary in the Employment Chapter to specifically mention the AONB as the Plan should be read as a whole and there are policies offering protection in the Natural Environment Chapter.

4.33.8 The supporting text has been amended to take into account this objection, in Proposed Change PRO039 which I agree with. As re-worded I consider the policy takes into account the provision of static holiday caravan sites in appropriate locations in the countryside.

RECOMMENDATIONS 4.33

- a) Modify Policy E9A by deleting “touring” and substituting “holiday” in the first line and delete “Static residential caravan sites will not be acceptable outside the defined settlements” from the Policy.
- b) Otherwise modify in accordance with Proposed Changes PRO039 and PRO040.