



20th January 2020

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Dear Sir/Madam

REPRESENTATION TO STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT PLAN – PS20 M5 JUNCTION 13

This representation has been prepared by Ridge and Partners on behalf of Ecotricity Group Ltd in relation to the consultation on the Stroud District Local Plan Review: Draft Plan. Ecotricity Group Ltd is the promoter of Land at M5 Junction 13, which is proposed to be allocated within the Draft Plan at PS20. The Draft Local Plan states the following:

‘Land at M5 Junction 13 (in Eastington Parish), as identified on the policies map, is allocated for a strategic mixed use development, including 10 ha employment, sports stadium, sports pitches, canal and open space uses, together with strategic landscaping. Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements and how development will prioritise walking, cycling and public transport over the use of the private car. A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.’

Ecotricity Group Ltd support the allocation of the site for mixed use development and support the mix of uses as identified within the policy, subject to minor amendments to allow for complementary ancillary uses, as considered further below. Previous representations have been made to the Local Plan Review which set out the need for the proposals, as well as the deliverability of the site more generally. The allocation is in line with the feedback from the previous consultation events on the ‘Issues and Options’ and ‘Emerging Strategy’ of the Local Plan Review; the results of these consultations demonstrate that there is support for employment growth adjacent to the M5, as well as majority support for the proposed allocation specifically¹. A significant amount of technical work has been undertaken to date as part of previous planning applications, which demonstrates the deliverability of the site. Furthermore, part of the site (land to the north of A419) has a resolution to grant planning permission for a new stadium. An application is currently being prepared for the Green Technology Hub on the southern parcel of land comprising of employment generating uses which will enable the canal restoration. The work undertaken to date is outlined below.

Site and Surrounding Area

The allocation is situated to the west of Stroud and Stonehouse, adjacent to Junction 13 of the M5 motorway. The allocated site comprises 2 parcels of land to the north and south of the A419. The northern parcel is 19ha and is

¹ The site was previously consulted on as 2 sites: PS20a to the North of the A419 and PS20b to the South of the A419. As part of the consultation of the ‘Emerging Strategy’, 39 letters of support were received for the proposed allocations, with 9 and 10 objections received for the 2 sites respectively.



bound to the west by the M5, to the south by the A419, and to the north and east by existing properties along Grove Lane and the existing petrol filling station, hotel and restaurants sited to the north-west of the Chipmans Platt roundabout. This parcel of land is also adjacent to the West of Stonehouse allocation, of which development is now significantly advanced. The southern parcel is approximately 23ha and is bound by the A419 to the north, M5 to the west, River Frome to the south, and existing residential development, William Morris College and Easington Trading Estate to the east and south-east. The land is currently in agricultural use and is relatively flat and low-lying.

The A419 provides one of the main gateways into this part of the Stroud District. It is currently a single carriageway.

The northern part of the northern parcel is bisected by two footpaths running broadly north to south, joining up just north of the southern boundary of this section of the site. The conjoined footpath then crosses the A419 and runs south through the southern parcel of land adjoining William Morris House to Westfield Bridge, a bridge over the now filled in canal.

National Cycle Route 45 which connects to Stroud, runs along Grove Lane then south at the roundabout before heading east along the canal/A419 corridor.

No Scheduled Monuments, Registered Parks and Gardens or Listed Buildings are present within the allocated site, however there are a number of Listed Buildings adjacent and within relatively close proximity to the site. Part of the southern parcel of land is located within the Industrial Heritage Conservation Area (IHCA). There are no landscape or wildlife designations within the allocated site.

Planning History

The site has been subject to a number of planning applications. In January 2016, an outline planning application was submitted for *'a 5000 capacity football stadium and other ancillary uses (Use Class D2); and up to 41300sq m of B1 floorspace; up to 22,800sq m of B2/B8 floorspace; indoor football playing pitch (use Class D2), other recreational use (use Class D2); Transport Hub (including ancillary parking for cars and coaches, and a drop off point for buses and taxis), with all matters reserved save for access'* (application reference **S.16/0043/OUT**). The illustrative concept plan submitted with the application included proposals for a 'Green Technology Hub' consisting of B-class employment uses, on the northern parcel of land. The Southern portion of the application site below the A419 was originally proposed as 'The Sports Hub' including a football stadium with various open training pitches, additional sporting facilities and parking. A new B1 (Office) block of some 5000sqm was also proposed for use by Ecotricity.

In December 2017, the application was significantly revised and removed the proposed employment land, Nature Conservation Area, some of the sporting facilities, and relocated some of the sporting facilities to the northern side of the A419. The description of development was amended to a *'5,000 capacity football stadium and other ancillary uses (Use Class D2); two full-sized grass pitches and a goal practice area (Use Class D2); car parking for cars and coaches and highways improvements to the A419 including a signalised site junction and combined cycle/footway. All matters are reserved save for access.'*

The application was heard by the LPA's Development Control Committee on 12 June 2019. The Planning Officer's Recommendation to Committee was that *'the Committee resolve to grant the Planning Manager authority to determine the application and grant outline planning permission upon completion of a satisfactory legal agreement and subject to the recommended planning conditions.'* However, the Committee resolved to refuse planning permission and the LPA's decision was issued on 26 June 2019. Whilst this application was progressed to an appeal, this was subsequently withdrawn due to the success of the revised application, as follows.

Following the above refusal, a revised outline planning application was submitted (**S.19/1418/OUT**) for 'a 5000-capacity football stadium and other ancillary uses (use Class D2); one full-sized grass pitch and one full-sized all-weather pitch and a goal practice area (use class D2); car parking for cars and coaches and highway improvements to A419 including a signalised site junction and combined cycle/footway. All matters reserved save for access.' This application was heard by the LPA's Development Control Committee on 18th December 2019. At this committee, Members resolved to grant outline planning permission subject to the recommended planning conditions and delegate authority to the Head of Development Management to complete a satisfactory legal agreement.

In this context, Ecotricity Group Ltd are confident on the delivery of a new stadium for Forest Green Rovers in a timely manner in line with the allocation.

An application is currently being prepared for the remainder of the 'Eco-Park' which will look to deliver a Green Technology Hub comprising of employment generating uses, with the aim of attracting green business and technology companies, as well as canal restoration on the southern parcel of land, in line with the remainder of the allocation.

Planning Policy Context

Draft Plan 2019

In addition to the policy above, the Draft Plan sets out a number of priority issues, of which one is to concentrate employment growth within the A38/M5 corridor and at locations in tandem with housing growth. This is taken forward to Strategic Objective SO2 which looks to provide for a strong, diverse, vibrant local economy that supports existing businesses and encourages new enterprise – enabling balanced economic growth, coupled with enhancing skills and job opportunities across the District.

Another of the priority issues is to move the District towards becoming Carbon Neutral by 2030, whilst adapting to the impacts of climate change and providing resilience for the future. Core Policy DCP1 takes this issue forward and states that to support this target all new development must be:

- located where the form and mix of development itself or proximity to essential services and facilities minimises the need to travel;
- designed to discourage the use of the private car, irrespective of fuel source, by prioritising in order of importance: walking, cycling and public transport to deliver the highest possible share of trips by the most sustainable travel modes;
- designed to maximise green infrastructure to sequester carbon and to support local food production;
- designed to follow the Energy Hierarchy principle of reducing energy demand, supplying energy efficiently / cleanly and using onsite low or zero carbon energy generation to meet standards which move progressively towards zero carbon, in terms both of regulated and unregulated emissions. Accordingly, new development should be constructed to achieve the highest viable energy efficiency and designed to maximise the delivery of decentralised renewable or low-carbon energy generation;
- designed to reduce vulnerability to and provide resilience from the impacts arising from a changing climate whilst not increasing the potential for increased greenhouse gas emissions in doing so.

Having taken into consideration local views, national policy and evidence where available, the employment strategy set out within the Draft Plan seeks to deliver:

- economic growth and additional jobs on and adjacent to existing high value employment sites and within the M5/A38/rail growth corridor; and

- new employment sites of varying sizes and locations to meet the specific locational requirements of different sectors, with particular support for green technology hubs.

In terms of the 'Stonehouse Cluster' specifically, it states that *'as a net importer of thousands of workers and with several major key employment sites around it, Stonehouse is the District's second biggest employment 'hub'.* It goes on to acknowledge that the town has a very important employment role.

Eastington Parish Council, Neighbourhood Development Plan 2015-2031

The Neighbourhood Plan has been designed to closely follow and be in conformity with the Stroud District Local Plan adopted in November 2015. As a consequence, the Neighbourhood Plan is based on the employment provisions of the adopted Local Plan and does not take into account the additional need identified as part of the Review.

The settlement boundaries in the Neighbourhood Plan are closely aligned to those defined in the Local Plan. These reflect the strategic growth options in the Local Plan.

National Planning Policy Framework (NPPF)

The NPPF highlights that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

In terms of Plan Making, Paragraph 20 identifies that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development. Paragraph 35 states that plans should be prepared in accordance with legal and procedural requirements, to determine whether they are sound. Plans are 'sound' if they meet the following tests:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

In terms of building a strong and competitive economy, Paragraph 80 states that planning policies should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need

to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 81 highlights that planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

Paragraph 82 highlights that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries.

Strategic Economic Plan for Gloucestershire March 2014, GFirst LEP

The Strategic Economic Plan (SEP) for Gloucestershire was adopted in March 2014 and provides an over-arching vision for economic growth in the County. The LEP acts as the voice of businesses in the county and a link between private, public and voluntary sectors.

The SEP aims to accelerate economic growth and address particular challenges faced in the County. Some of the challenges identified are how to support the growth of knowledge-intensive sectors, the need for innovation to be a stronger driver of productivity and how to capitalise on our entrepreneurial culture.

Whilst the SEP recognises that Gloucestershire has a diverse and resilient economy with particular expertise in renewable energy, it also recognises that some of the threats that the County currently face relate to the lack of suitable premises for high value businesses and an insufficient number of attractive development sites.

To address these threats the SEP has set a bold target for growth which is above the national average and in order to achieve this target has set out ambitious projects for growth.

One of these projects is establishing a 'Growth Zone' along the M5 corridor, the aim of which is:

"The primary aim of the Growth Zone is to ensure the availability of quality employment land in proximity to the M5 motorway attractive to business and with excellent connectivity throughout Gloucestershire and the rest of the UK. This will serve the latent demand in the market place and provide space required to enable Growth Hub supported business growth."

And

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

Gloucestershire Local Industrial Strategy Draft 2019, Gfirst LEP

Gloucestershire's Local Industrial Strategy (LIS) identifies Gloucestershire's strengths, opportunities and challenges. It sets a strategy to drive productivity and prosperity in Gloucestershire and support an inclusive economy. The emerging plan will play to the strengths, capabilities and skills of Gloucestershire's employers, and highlight the business sectors we expect to make the greatest contribution to economic growth in the county by 2030.

One of the opportunities identified is to present Gloucestershire as 'the greenest place to live and work in England'. This includes putting clean growth at the heart of strategies for business growth, building on the capabilities of local green companies and attracting more, reducing carbon emissions to net zero by 2050. It goes on to state that Gloucestershire sees an opportunity to be the greenest place to live and work in England and a 'magnet county' championing natural capital-based growth, creative green business development opportunities, and reducing its carbon emissions to net zero by 2050 or sooner. By building on the Gloucestershire Sustainable Energy Strategy, the aim is to protect and improve the natural environment whilst at the same time exploiting the productivity improvements to be gained by businesses adopting greener approaches. Going green will not be a barrier to growth – it will enable Gloucestershire to engage in the renewable and clean energy market and provide opportunities for individual businesses to reduce energy consumption and save money to reinvest to improve productivity.

Reference is made to a 'local green skills and business hub' which states that *'Ecotricity are also leading plans for a world-class low-carbon stadium and employment hub nearby at junction 13 of the M5. The Eco-Park will create up to 4,000 new jobs, with a focus on attracting companies from the growing green economy in Gloucestershire and beyond.'*

In terms of the ambition, page 38 states that *'we want deliver a vibrant business and education offer at Berkeley Science and Technology Park, as a hub for future low-carbon technology innovators. This will work in tandem with a proposed future Eco-Park at junction 13 of the M5, creating a vibrant hub for green technology and skills in Stroud district.'*

Discussion

Ecotricity Group Ltd support the allocation of the site for mixed use development and consider that the proposed allocation is in line with the strategy set out within the Draft Plan, as well as the aspirations of the Government within the NPPF, and of Gfirst LEP as confirmed within the Strategic Economic Plan and Local Industrial Strategy. One of the clear messages identified within the Draft Plan and the Local Industrial Strategy is for the District to become Carbon Neutral by 2050, as well as looking to put clean growth at the heart of strategies for business growth, building on the capabilities of local green companies and attracting more. In this context, the NPPF is clear that policies should have regard to Local Industrial Strategies and set out a clear vision which positively and proactively encourages sustainable economic growth. The vision for the Green Technology Hub element of the proposal is to create up to 4,000 new jobs, with the focus being on attracting green businesses and technology companies. The vision of Ecotricity therefore accords with these aspirations and the allocation of the site as proposed does deliver against these principles.

Furthermore, the allocation is in line with the feedback from the previous consultation events on the 'Issues and Options' and 'Emerging Strategy' of the Local Plan Review; the results of this consultation demonstrates that there is support for employment growth adjacent to the M5, as well as support for this allocation specifically.

The remainder of this section looks at key planning considerations of relevance to the deliverability of the site, before proposing minor amendments to the policy as drafted to ensure greater flexibility as the masterplan of the site develops.

Deliverability

In terms of the deliverability of the site for a mixed-use development, significant amount of technical work has been undertaken to date as part of previous planning applications, which demonstrates the deliverability of the site. This includes the work undertaken as part of the original application S.16/0043/OUT which comprised both a 'Green Technology Hub' and 'Sports Hub' as above. Whilst this application was revised to remove the 'Green Technology Hub' the work undertaken as part of the original submission was substantial and demonstrates the ability of the allocated site to deliver these uses.

Further detailed work was undertaken as part of the revisions to the above application (which involved the removal of the Green Technology Hub) and also the revised application S.19/1418/OUT which relates to a proposal for a stadium and related sports uses. This latter application has a resolution to grant planning permission. An application for the southern parcel of land for a Green Technology Hub comprising of employment generating uses is currently being prepared.

The work undertaken to date concludes that the site is suitable for the proposed mix of uses. The following provides a summary of the key technical matters of relevance; further work is ongoing and full assessments undertaken as part of the above applications can be accessed through the Council if required.

Masterplanning

Creating the right environment to draw green business and technology companies at the gateway into Stroud will be achieved through an iterative masterplanning process. This will largely be a landscape led approach to masterplanning that draws inspiration and works with the landscape and its character. It will also reflect the outcomes of a number of technical and environmental assessments including sustainable transport, ecology, heritage, flood risk, noise and socio-economics.

The level of constraint and opportunity that each of these aspects present will be determined by a comprehensive desk and site-based assessment. Sustainability will be at the heart of the proposals and the business park will embrace the need to respond to climate change through methods of construction, renewable energy, recycling and waste minimisation. The masterplan will also encourage interaction and the sharing of ideas as a focal point of creativity and innovation. Buildings will be set in a strong landscape that significantly enhances its biodiversity and landscape value and helps to assimilate it into the local context whilst encouraging people to engage with one another. An added benefit will be working with the District Council to deliver the missing section of the Stroudwater Canal either side of the M5 motorway.

Flood Risk and Drainage

A Flood Risk Screening Study accompanies this representation which demonstrates that the majority of the allocated site is situated in Flood Zone 1, with an area to the south of the southern parcel of land which is designated as Flood Zone 3. The most recent Level 2 Strategic Flood Risk Assessment shows that 11.9% of the total strategic site area (42 ha) is in Flood zone 3b and 6.8% is within Flood Zone 3a. The Level 2 Strategic Flood risk assessment confirms that the site is classed as Less Vulnerable in terms of Flood Risk vulnerability as defined by Paragraph 66, Table 2 of the NPPF.

Following the required guidance in the Catchment Flood Management Plan, surface water discharge from the site will need to be by way of a SuDS scheme to manage surface water on site and discharge to an agreed rate.

Modelling carried out as part of the FRA for the Missing Mile canal shows that the area of the site to the North East of the canal will become protected and the risk of flooding will reduce. Based on the understanding that the EA has accepted the Missing Mile modelling and data, there appears to be clear benefits to the proposed developable areas if a scheme is taken forward in conjunction with the canal development. Further engagement will be required with the EA and LLFA in conjunction with the development of the scheme to gain a full understanding of this. Ultimately flood risk does not preclude or prevent the development of the site as set out in the draft plan.

Landscape Considerations

A full landscape and visual impact assessment will be undertaken for any future application to identify the effects of the proposals on landscape character and visual amenity. This is measured by the change that would occur to the baseline landscape resource. Initial landscape and ecology strategies will be developed into a comprehensive GI masterplan which will show a strong interlinked series of landscape and habitats performing and their functions whilst creating a framework for development.

Highways

This representation is accompanied by a Transport Representation, prepared by Ridge and Partners LLP. This highlights that the proposed allocation is in a suitable and sustainable location from a transport perspective. It offers the opportunity to locate further employment locally within the District close to Stroud and stop out commuting of residents for work.

The Site is accessible by public transport, being served by three local bus services, with proposals for dedicated bus services to serve the site as part of the Stadium proposals. The proposed allocation is also within cycling distance of several local towns and villages which means that future employees and visitors have a sustainable alternative to short private car journeys when accessing the Site.

As highlighted in the Transport Representation Report, substantial amount of technical work has been undertaken as part of previous planning applications to prove that this site is acceptable and deliverable for some 4,000 jobs/circa 60,000 sqm/10ha employment. This is supported by Gloucestershire County Council and Highways England agreeing that Transport and Highways is acceptable for development in this location and Stroud District Council recommending resolution to grant on the stadium proposals on the northern parcel of the proposed allocation. The highways improvements identified for the stadium (dualling of the A419) will also accommodate the peak time traffic flows from 10ha of employment at the site.

It is therefore concluded, that in transport terms the allocation of PS20 is acceptable in the context of the NPPF and local planning policy and there is no reason why the site should not be allocated for development in respect of highways.

Heritage and Archaeology

A summary of Heritage and Archaeological Constraints has been prepared by Cotswold Archaeology, which is enclosed for information. The report includes a summary of the planning history to date, a summary of the archaeological and heritage baseline and constraints, the potential effects of a development at this location, and a proposed methodology for assessing the identified effects. It identifies that there are several heritage and archaeological constraints for the allocated site, and development has the potential to impact on both subsurface archaeology and above ground archaeology, including effects on the Industrial Heritage Conservation Area,

surrounding Listed Buildings and potentially below ground archaeology. A heritage assessment and ES chapter was prepared for the original application on the site, which was amended when the scheme was revised and limited to north of the A419. It is acknowledged that the land to the South has greater heritage constraints. As part of the application on this parcel of land, a heritage assessment will be prepared which will assess the sensitivity of the heritage and archaeological features, and assess the effect of any development on these features. This may include field evaluation in the form of geophysical survey and trial trenching, in areas that have not already been subject to previous investigation. However, the IHCA, Roman villa, and Listed Buildings do not in themselves preclude development in this Site; however, any effects identified on these heritage features will need to be carefully mitigated through design or further archaeological investigation

Amendments to Allocation

As above, the allocation of the site for a mixed-use development is supported by Ecotricity. However, it is requested that the types of uses identified within the allocation are expanded upon to allow complementary uses at the site, including potential future canalside and retail uses. These would be ancillary to the delivery of employment generating uses and would create a mix of uses which help deliver the overall vision for the site.

The provision of non B-class uses as complementary to the delivery of business parks has been considered recently by a number of appeal Inspectors within the County. Of relevance are the appeals at Grovefield Way, Cheltenham² as well as Stonehouse Business Park³. In both of these appeal decisions, the Inspectors recognised that mixed uses are recognised as attractive in business parks and non-B1 jobs are important to overall economic growth. As part of the Grovefield Way appeal, GFirst LEP made the point that non B-Class uses are required to secure the delivery of B-Class uses, and that non B-Class uses can assist in an overall employment strategy by making safeguarded employment areas more attractive, so long as the balance of uses is appropriate. The LEP specifically makes the point that non-B class uses are required to secure the delivery of B class uses.

In this context, it is suggested that further flexibility is built into the proposed allocation to allow for complementary uses as part of the Green Technology Hub. As such, it is recommended that the wording is amended as follows:

*'Land at M5 Junction 13 (in Eastington Parish), as identified on the policies map, is allocated for a strategic mixed use development, including 10 ha employment **with complementary ancillary uses**, sports stadium, sports pitches, canal, and open space uses, together with strategic landscaping. Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements and how development will prioritise walking, cycling and public transport over the use of the private car. A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.'*

Summary and Conclusion

Ecotricity Group Ltd support the allocation of the site for mixed use development and support the mix of uses as identified within the policy. Previous representations have been made to the Local Plan Review which set out the need for the proposals, as well as the deliverability of the site more generally. A significant amount of technical work has been undertaken to date as part of previous planning applications, which demonstrates the deliverability of the site. As such, the allocation of the site is supported as a suitable and sustainable option for future

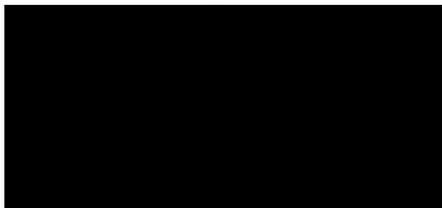
² Appeal A: APP/B1605/W/18/3200395 Appeal B: APP/B1605/W/18/3214761

³ APP/C1625/W/18/3214940

development. However, Ecotricity Group Ltd request that some flexibility is built into the policy to allow for complementary ancillary uses, through minor amendments to the wording.

We trust that this letter will be taken into account. If you require any further information please do not hesitate to get in touch.

Yours faithfully,



For Ridge and Partners LLP