

22<sup>nd</sup> January 2020

Local Plan Review  
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Dear Sirs

## **STROUD LOCAL PLAN REVIEW: EXTENSION TO ASTON DOWN**

### **LAND NORTH OF ASTON DOWN**

This representation has been prepared by Ridge and Partners LLP in response to Stroud District Councils Draft Local Plan consultation on behalf of [REDACTED].

Our representations are accompanied by separate Transport Representations which demonstrate that the site is in accessible and sustainable location.

The Land North of Aston Down (hereby referred to as "The Site") is located between Minchinhampton (Tier 2 settlement) and Chalford (Tier 3 settlement) within the open countryside. Immediately south of the Site is, key employment site ("KES"), EK21 Aston Down. In addition, the Site is within the Cotswolds Area of Outstanding Natural Beauty (AONB) - an area where development should be sensitive towards its landscape. Therefore, landscaping considerations would be given to the conservation and enhancement of the AONB whilst taking account of the biodiversity interest. The vision for the land is to propose a landscape buffer to help conserve and enhance the character of the AONB.

The Site appears to have been partially developed with visible access points, tracks and hardstanding as seen in Figure 1. There are no buildings present and the disused campsite has been abandoned. In the past, the Site was used for a local car boot sale, which utilised the hardstanding and surfaced access routes on site.



Figure 1 – Aerial image of the Site

The current boundary of KES EK21 is set out in Figure 2. As part of the Local Plan Review, it is recommended that this boundary is extended to accommodate the site in Figure 1.



Figure 2 – EK21 Aston Down

The Site could provide approximately 3.8ha of additional employment land to an already allocated 19.2ha allocated site. It has been noted that the Cotswold AONB Management Plan 2018-2023 does not rule out development within the AONB as long as it is compatible with conserving and enhancing its character.

The following businesses are considered to benefit from being in the AONB;

- Lifestyle businesses;
- Home working, small-scale rural office developments; and
- Knowledge-based businesses.

The Site would provide opportunity for these types of businesses to come to the area as the existing KES is currently not catering for such businesses.

Further, the Site has the capacity to provide parking provision to support employment uses and would result in the development of previously developed land. The accessibility via Cirencester Road (A435) would make this site attractive to potential occupiers.

## Planning History

Planning permission was granted in February 1997 (LPA Ref.: S.96/1102) for a change of use from disused campsite to allow for the storage of topsoil. This application relates to a small proportion of the site under the site reference 17867 and establishes the land type as previously developed.

## STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT LOCAL PLAN

Stroud District Council are in process of reviewing the current Stroud District Local Plan. The District Council has approved a Draft Local Plan for the purposes of public consultation. On behalf of [REDACTED]

[REDACTED] Ridge and Partners LLP submit the following representation with specific reference to:

- the draft development strategy,
- delivering Carbon Neutral by 2030,
- strategy growth and development locations,
- new employment development,
- key employment sites and development at existing employment sites in the countryside.

## The Draft Development Strategy

The economic future of the District is set out in the proposed strategic objective SO2: Local economy and jobs, which states:

*“Providing 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”.*

Ridge and Partners LLP support the proposed strategic objective and are of the opinion that the Site would contribute towards achieving this goal.

The draft 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, with focus on regenerating large scale brownfield sites for employment. The Site is adjacent to KES EK21 and therefore would offer economic growth and additional jobs adjacent to an existing high value employment site.

## Draft Core Policy 1: Delivering Carbon Neutral by 2030

Draft Core Policy 1 (‘DCP1’) introduces a new draft policy reflecting the Council’s commitment to become Carbon Neutral by 2030 ahead of the Government target of net Zero Carbon 2050. The policy sets the requirement to locate new development where the form and mix of development is in proximity to essential services and facilities to minimise the need to travel.

Ridge and Partners LLP broadly support the intention of the policy. However, this policy has a potential to significantly restrict rural employment opportunities in the District, contrary to paragraph 84 of the Framework. We believe that this policy has not been positively prepared, and the requirements are not justified. It has a potential to significantly impact the District’s ability to meet both housing and employment local needs.

A key aspect to adopting a carbon neutral strategy is to boost the resilience of homes, businesses and infrastructure. DCP1 would adversely impact the resilience of development proposals, especially rural employment sites, where private car use is favoured. We believe that the requirements proposed establish a sequential approach which would stifle the potential for employment growth in rural areas. It would further adversely impact on the sustainability of existing businesses in rural locations.

In addition, paragraph 2.50 of the Draft Plan recognises the Local Plan’s role in providing certainty to the business community to make long term investment decisions, while also providing the framework for creating an attractive environment including providing for a range and choice of sites and premises. However, the second requirement

set in DCP1 directly contradicts paragraph 2.50 and would discourage businesses, including businesses at EK21, to make long term investment decisions.

An extension to EK21 would encourage long term investment decisions by providing greater opportunities for current occupiers to expand and diversify the employment offer at this key employment location.

## Draft Core Policy 2: Strategic Growth and Development Locations

The Draft Core Policy 2 ('DCP2') recognises a need to plan for between 2,300 - 6,300 net new jobs and provide at least 50 hectares of additional employment (use classes B1-B8) land (2020-2040).

Whilst Ridge and Partners LLP agree that there is a need for employment within the District, it is our opinion that additional employment land is identified within Minchinhampton Parish. The Employment Land Availability 2019 ('ELA') identifies that Minchinhampton Parish has lost 1.54ha of employment land on windfall sites; and further potential loss of 4.5ha on allocated sites was identified as at 1<sup>st</sup> April 2019.

## Draft Core Policy 11: New Employment Development

Draft Core Policy 11 ('DCP11') relates primarily to the delivery of new employment development within the District. Proposed changes to this policy reflect locational requirements of different sectors. It is also acknowledged that rural business need cannot always be met in locations currently well served by public transport. The expansion of existing businesses and rural diversification is supported.

The draft policy also states that "*Permission will be granted for industrial or business development, or for the expansion or intensification of existing industrial or business uses, recognising the specific locational requirements of different sectors, provided that the proposals would:*

- 1. Be of a type and scale of activity that does not harm the character, appearance or environment of the site or its surroundings or to the amenity of occupiers of nearby properties*
- 2. Be readily accessible by public transport, wherever possible, and by bicycle and foot, or contribute towards provision of new sustainable transport infrastructure to serve the area, to make the development accessible by those modes*
- 3. Have a layout, access, parking, landscaping and facilities that are appropriate to the site and its surroundings.*
- 4. Use sustainable construction techniques and provide for renewable or low carbon energy sources in association with the proposed development*
- 5. Enable provision of infrastructure in ways consistent with cutting carbon dioxide emissions and adapting to changes in climate (including SuDS and green infrastructure)*
- 6. Demonstrate how the principles of industrial symbiosis have been considered".*

We support the intention of this draft policy. The extension of Aston Down key employment site would help provide greater opportunities and rural diversification. Furthermore, it would allow for the expansion space to accommodate current occupiers of EK21; for intensification of existing uses; and for introduction of new business uses to the site.

### Draft Delivery Policy EI1: Key Employment Sites

Draft Delivery Policy EI1 enlists the key employment sites in the District which should be retained for B Class Uses, including EK21 Minchinhampton: Aston Down.

Ridge and Partners LLP strongly support the protection and development of employment site EK21 but suggest that the EK21's capacity and potential is increased by further extension which can be achieved through additional allocation of Land North of Aston Down.

### Draft Delivery Policy EI4: Development at existing employment sites in the countryside

Draft Delivery Policy EI4 ('DDPE4') relates primarily to development at existing employment sites in the countryside. It details that *"the extension of existing buildings, site boundaries and the provision of new buildings, including infilling between existing buildings, will be acceptable providing that:*

- 1. The proposal facilitates the retention or growth of local employment opportunity*
- 2. The proposal would not cause an unacceptable visual impact on the local character in terms of its siting, scale, materials or site coverage*
- 3. There are no suitable alternative buildings or sites that can be used adjacent to the site or locality*
- 4. The proposal can avoid harm to local amenities and adjoining land uses, particularly where residential uses have been permitted on part of the site*
- 5. The proposal would not generate significant traffic movement and volume that would lead to unacceptable environmental impacts or detriment to road safety".*

Additional allocation of Land North of Aston Down would facilitate employment retention on the existing key employment site.

Further addition would not generate significant traffic movements or volume of traffic which would lead to unacceptable environmental impacts or would be detrimental to road safety. Our representations are accompanied by Transport Representations document concludes that the site is well connected to the local strategic highway network; is served by public transport and accessible through non-vehicular modes of transport.

**SUSTAINABILITY**

The sustainability of the Site has been assessed against the assumptions made in Appendix 1 of the Sustainability Appraisal (“SA”) report prepared by Land Use Consulting and published in August 2018. The assumptions have regard for the minor and significant effects for each SA objective.

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social Inclusion	SA 4: Crime	SA 5: Vibrant Communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscape	SA 9: Historic Environment	SA 10: Air quality	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient Land Use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic Growth
Land North of Aston Down	0	+	0	0	+	0	0?	--?	0	--?	--?	0	+	0	+?	+	+

Table 1: Sustainability Appraisal of the Site

It is found that the Site, much like all employment sites within the Draft Plan, has a negligible effect on the following objectives:

- SA 1: Housing;
- SA 3: Social Inclusion;
- SA 4: Crime;
- SA 6: Services and Facilities;
- SA 7: Biodiversity/geodiversity;
- SA 9: Historic Environment;
- SA 12: Flooding;
- SA 14: Climate Change.

In addition, it is found that the Site would have a positive effect on the following objectives:

- SA 2: Health;
- SA 5: Vibrant Communities;
- SA 13: Efficient Land Use;
- SA 15: Waste;

- SA 16: Employment;
- SA 17: Economic Growth.

Also, it is found that the Site could have negative effect on the following objectives:

- SA 8: Landscapes/Townscapes;
- SA 10: Air Quality;
- SA 11: Water Quality.

However, all negative aspects indicated within the sustainability appraisal can be appropriately mitigated. With regards to “SA 8: Landscapes/Townscapes”, the future development would seek to positively enhance the character and quality of the landscape, through appropriate the design of the built form and through emphasis on enhanced landscaping within the sit. We are of the opinion that significant enhancement of the landscape can be achieved.

The “SA 10: Air Quality” objective is judged upon sustainable transport modes and is also considered to be uncertain at the time of writing. A positive outcome regarding air quality would be achieved through the implementation of a travel plan which would be agreed during the future planning application stage. Due regard would be paid to any existing travel plans associated with the existing Aston Down key employment site.

As set out above, the Site has potential to significantly enhance the locality without inflicting a negative impact towards achieving social, economic and environmental objectives.

## NEED FOR ADDITIONAL EMPLOYMENT LAND

As set out above, the draft policy DCP2 identifies a need for additional employment land of at least 50 ha within the plan period. The employment land identified in the Draft Local Plan is:

- Quedgeley East Extension: 5ha
- Javelin Park: 9ha
- Sharpness Docks: 7ha
- Sharpness: 10ha
- Stonehouse North West: 5ha
- Stonehouse Eco-Park (M5 J13): 10ha
- Wisloe: 5ha
- Renishaw New Mills: 10ha

The above sites collectively provide up to 61ha of employment land. However, we are of the opinion that additional sites should be identified to ensure sufficient flexibility of the Draft Local Plan and to ensure that the economic needs of the District are met.

Paragraph 2.56 of the Draft Plan recognises that the Stroud District is faced with a key issue relating to the number of people out-commuting to work. Therefore, access to jobs, services and facilities needs to be improved in the future. To counter the considerable challenge of out-commuting, the District needs to enable greater employment opportunities for the highly skilled and well qualified working population.

According to the ELA, which forms part of the Draft Local Plans evidence base, 6.5ha of employment land was lost at Site Allocation 1 ('SA1'), Stroud Valley. Additional potential losses of allocated employment land are identified and reach up to 9.3ha in Stroud District, of which 4.5ha could be lost in Minchinhampton Parish alone. This is highlighted as a concern within the ELA.

Such losses intensify the need to ensure that Minchinhampton's employment needs are met by allocating a further 3.8ha of employment land and extending the provision at Aston Down. We consider such addition to be essential to ensure a balanced community, where local job opportunities are provided, is maintained.

Allocating the Site would further cater for the District's changing employment trends and commuting imbalances, created by people travelling to towns and cities beyond the District for work. We believe this can be achieved by allocating the Site as an organic, and a logical extension to the existing and viable business location. In accordance with the paragraph 117 of the NPPF, allocating the Site, a previously developed land, actively promotes an effective use of land to meet the need for employment.

## FUTURE GROWTH STRATEGY

As set out above, CP11 provides a clear recognition that the expansion of existing businesses and rural diversification is supported. The Local Plan highlights that, to stem out-commuting, Stroud will need to attract more knowledge-based industries alongside the capacity of employment sites to meet emerging opportunities within the green sector for clean growth and for supporting cyber-tech innovations.

## SUMMARY AND CONCLUSION

Stroud District Council is reviewing its adopted Local Plan in accordance with paragraph 33 of the NPPF which requires policies in local plans and spatial development strategies to be reviewed at least once every five years. Such review should take into account changing circumstances affecting the area.

In this respect, we support the intention of the newly introduced policy DCP1, however we are of the opinion that its wording needs to be amended to prevent stifling of development in rural locations which generally suffer from lack of connectivity through alternative modes of transport. As such, we are of the opinion that in its current form the draft policy **DCP1 is not positively prepared** and **is ineffective** in supporting development in rural areas.

Furthermore, the introduction of sequential approach to prioritising modes of transport **is inconsistent** with national policy, particularly with paragraph 84 of the NPPF; and we find that wording of DCP1 is **not justified** within the evidence base provided.

Contrary to requirements of paragraph 80 of the NPPF, there are further inconsistencies between draft policies DCP1 and DCP2 which restrict businesses who may want to invest, expand and adapt within the Stroud District. We believe that draft Local Plan needs to encourage further employment development to assure that local business and community needs in rural areas are satisfied.

In this respect we would like to put forward a site at Aston Down for employment land allocation, as this site forms a logical and organic extension of an existing key employment site in an area where provision of employment land is relatively limited. Further addition of employment land in this location would have positive impact towards achieving sustainability and overcoming out-commuting issues, and loss of employment land to alternative uses identified within Minchinhampton. Such allocation would also add greater flexibility to the Plan in case the delivery on other strategic employment site is delayed.

I trust that our comments will be taken into consideration during preparation of the submission version of the Stroud District Local Plan Review.

Please do not hesitate to contact me if you require any further information regarding the above.

Yours sincerely



Planner  
For Ridge and Partners LLP