



RE: Representations to Planning Application s.16/0043/OUT – Land at M5 J13 West of Stonehouse, Eastington

“5,000 capacity football stadium and other ancillary uses (Use Class D2); up to 41,300m2 of B1 floor space; up to 22,800m2 of B2 / B8 floor space; indoor football playing pitch (Use Class D2), other recreational uses (Use Class D2); leisure facilities (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.”

Troy Planning & Design (Troy Hayes Planning Limited) has been instructed by Eastington Parish Council to assist in the preparation of representations to planning application s.16/0043/OUT referred to above. On behalf of the Parish Council, we have undertaken a detailed review of the material presented as part of the application and has worked alongside transport consultants, Helix, also instructed by the Parish Council to assist with comments on this invariably complex application.

We have extensive experience of the planning system, having contributed to a number of post-NPPF adopted Local Plans as part of work in the public sector and representations for private sector clients. Specifically, in relation to these representations, these activities have involved the production of numerous employment land reviews and presentation of policies for large scale strategic employment allocations. We draw upon this experience to assist with comments on these specific matters alongside the numerous other material considerations related to these application proposals.

The ongoing opportunities to engage with the Local Planning Authority in the course of determining the application are welcomed as is the diligence of the Case Officer in providing updates on the process of considering the application. From work undertaken so far we acknowledge the extremely high likelihood that revised application material may be presented in due course and potentially subject to further consultation. Eastington Parish Council, and Troy Planning & Design acting on their behalf, therefore reserve the right to provide further representations in due course.

Table of Contents:

1. Introduction and Executive Summary.....	3
2. Strategic Relationship with the Adopted Stroud District Local Plan (2015)	5
3. Consideration of Strategic Development within the Plan-Making Process.....	8
4. Impact on Landscape, Heritage and Local Character.....	12
5. Relationship with the Local Enterprise Partnership Strategic Economic Plan and wider Functional Economic Market Area	17
6. Contribution to Sustainable Working Patterns and Job Growth	20
7. Functionality of Eco-Park, Consideration of Alternatives and Estimates of Job Creation	23
8. Concluding Remarks.....	26

1. Introduction and Executive Summary

- 1.1. These representations cannot be divorced from the strategic nature of the application proposals and the fact that they will inevitably have social, economic and environmental implications in terms of land use, transport and employment patterns far beyond the immediate locality of the application site. The importance of such effects is highlighted by the requirement for a comprehensive Environmental Statement as part of the application process and evidenced by the substantial volume of material subsequently put forward to evidence the proposals. Representations on these detailed strategic matters will undoubtedly be provided by a number of key stakeholders including adjoining authorities and statutory consultation bodies.
- 1.2. However, not least because of Section 38(6) of the Planning and Compulsory Purchase Act (2004) and the requirement to determine applications in accordance with the development plan unless material considerations indicate otherwise, it is necessary for these representations to provide a local interpretation of these strategic matters alongside other relevant considerations.
- 1.3. On a specific level, the application proposals are located entirely within the Parish of Eastington and therefore to an equal or greater degree it is important that these representations highlight key local considerations. The greatest effects of any development will be specifically concentrated at the local level both in terms of the potential benefits that might be secured but also the combined implications of impacts from a marked change in patterns of land use, transport, amenity and the appearance of the local and wider landscape.
- 1.4. These representations therefore seek to highlight important considerations for the planning balance specifically at the local level but should also be viewed in the context of the appropriateness of the proposals in a strategic sense and in relation to the development plan as a whole. The following (non-exhaustive) key points are critical:
 - The proposals are in conflict with the Stroud Local Plan and emerging Eastington Neighbourhood Development Plan
 - The application material does not thoroughly reflect the existing character and settlement pattern of Eastington Parish as a whole or specifically in relation to the Industrial Heritage Conservation Area
 - The application material does not adequately reflect or address the cumulative issues and impact resulting from the proposed development together with other proposals in the area including land West of Stonehouse
 - There is a lack of analysis of local changes in employment, use of sustainable transport and travel-to-work patterns
 - The applicant has not clearly demonstrated the scale and nature of employment development needed to viably enable delivery of the Stadium Complex
 - Estimates for job creation indicate a large volume of high intensity office floorspace likely to conflict with Town Centre locations and existing premises.
 - The benefits of sustainable development are over-stated in the context of a relatively isolated location, adjacent to the strategic highways network.

- The location is not explicitly supported in the GFirst Strategic Economic Plan and conflicts with other priorities such as GREEN at Berkeley Power Station

- 1.5. In summary, the application proposals are fundamentally at odds with the locations and requirements for development identified in the recently adopted Local Plan. The proposed scheme is presented on a speculative basis contrary to the plan-led approach as a whole and highly likely to have premature effects on Stroud DC's overall strategy in terms of the balance between homes and jobs and the role and character of different places as defined by the Stroud Local Plan (Adopted November 2015).
- 1.6. The presumption in favour of sustainable development requires plan-making to identify and meet objectively assessed needs for jobs and housing. The recently adopted Stroud District Local Plan achieves these objectives, as verified by the Examination Inspector's Report in finding the strategy sound and sufficiently flexible. The Local Plan represents an appropriate strategy for sustainable development as defined for the local area.
- 1.7. The Local Plan cannot be considered silent, absent or out-of-date in respect of the application proposals. However, even if to some degree this was accepted to be the case, the adverse effects of granting permission would significantly and demonstrably outweigh any potential benefits taking into account the harm to the plan-led approach to sustainable development and other specific considerations.
- 1.8. There exists a lack of appropriate safeguards in policy terms to conclude that the scheme will contribute net gains to the overall achievement of sustainable development. As a result, any potential benefits are outweighed by the harm likely to result from development. These harms will be proportionally greater within the Parish of Eastington due to the location of the site and local effects in terms of landscape and its operation. Conversely there is a lack of evidence for how any elements of the proposals might in practice present clear or demonstrable benefits to the local community could outweigh these harms. This conclusion relates back to the fact that the proposals are brought forward outside of the plan-led approach and due to the cumulative impact of the overall scale of development and combination of land uses on which delivery of the proposals (in-particular the stadium) is said to rely.
- 1.9. Any future conclusions on the suitability and sustainability of development at this scale should only be reached through the plan-led system in terms of determining the appropriate type and scale of any uses that might be appropriate. This should take place alongside extensive community engagement looking to comprehensively secure positive development outcomes and potential community benefits. For example, this would necessitate a thorough understanding of the effect on existing settlements and communities and any mitigation that might be needed such as community infrastructure or traffic management.
- 1.10. It can comprehensively be concluded that the current application proposals should be refused. Consideration of development at this location and broadly akin to the scale of the application proposals has been considered as part of preparing the adopted District Local Plan and rejected

in favour of preferable alternatives. Whilst it will be for future work to review or update the Local Plan to identify *reasonable alternatives* there is nothing at present to indicate that the application site is likely to form part of any preferred spatial strategy for the area.

2. Strategic Relationship with the Adopted Stroud District Local Plan (2015)

Introduction

- 2.1. The nature of the application proposals in the context of the recently adopted Stroud District Local Plan is of key concern to Eastington Parish Council.
- 2.2. In issuing his report on the District Local Plan, Inspector Stephen Pratt has firmly concluded that the Examination process has allowed previous deficiencies in the justification for the economic and employment strategy and its relationship with the proposed level of housing to be overcome. It is evident that this has been achieved through extensive engagement with relevant stakeholders and adjoining authorities. Paragraph 62 of the Inspector's Report summarises:

“SDC’s revised economic assessment has regard to the wider economic area of Gloucestershire, including the LEP’s Functional Economic Market Area, and has considered cross-boundary factors such as commuting and the inter-relationship between jobs both within and outside Stroud district. SDC has also reassessed the relationship of the SDLP with the LEP’s SEP, in terms of economic growth forecasts and the spatial and sectoral provision of employment land; the SDLP is now fully aligned with the LEP’s economic objectives and growth forecasts set out in the latest SEP [PS/E15; PS/D6ab/D18a]. The level of jobs growth proposed in the SEP (0.8%) lies in the mid-range of the SDLP’s assumptions (0.63-1.16%), whilst GVA growth in Stroud is in line with that predicted in the SEP over the whole LEP area. The amount of employment land proposed would also comfortably meet, and probably exceed, jobs growth projected in the SEP, whilst providing a balance between jobs and new housing within Stroud district.”

- 2.3. The strategy for economic development takes full and sound account of the Local Enterprise Partnership’s wider strategic focus along the M5 corridor and the District Local Plan provides an appropriate range of sites to contribute towards these objectives. The Inspector concludes that the upper end of the District Local Plan jobs target can be achieved as part of an aspirational but realistic strategy which in principle provides a surplus against future needs.
- 2.4. It is now critical that as part of the plan-led approach, future planning decisions reflect this broad assessment of evidence to identify the most appropriate spatial strategy for the area. The adopted District Local Plan reflects successful outcomes on the key components for plan-making. It reflects careful consideration for the strategic priorities for plan-making under NPPF Paragraph 156 in terms of the homes and jobs needed in the area and the focus for delivering key infrastructure. The approach also highlights Paragraphs 179 and 180 of the NPPF following successful work under the Duty to Cooperate. In terms of the detailed requirements when preparing policies for ‘Business’ and economic development at NPPF Paragraphs 160 and 161,

the District Local Plan provides the best understanding of markets operating in and across its area as well as providing detailed evidence on the existing stock of business land and assessment of future supply.

- 2.5. Paragraph 202 of the Inspector's Report further highlights the ability of the District Local Plan to achieve appropriate phasing of strategic sites through Masterplanning and conditions to "*ensure a balanced delivery of housing and employment development*". It is appropriate that the priorities for plan-making are addressed over the longer term on this basis and that the strategy in the District Local Plan is given a chance to succeed.
- 2.6. There can be no justification to depart from the strategic approach in the adopted District Local Plan based on the nature of these application proposals.

Relationship with Eastington Parish

- 2.7. Eastington Parish sits within the 'Stonehouse Cluster' as defined by the District Local Plan. Policy CP4 of the plan sets out that proposals should have regard to the 'Mini-Visions' and Guiding Principles for each cluster. The strategy for the area was arrived at through carefully balancing the priorities for plan-making at various stages of the plan-making process. This has allowed a detailed understanding of local evidence and key local issues, such as traffic congestion at key times and the importance of the canal corridor. As a result, it can be recognised that the identification of the strategic development opportunity 'West of Stonehouse' is a component part of the wider local strategy.
- 2.8. For example, the 'Mini-Vision' for the area identifies the strategic location 'West of Stonehouse'. The position of the strategic location is intended to improve links to the town centre and employment locations and provide opportunities to enable more people to use the sustainable 'green links' across the main built area (including environmental enhancement through restoring the canal corridor). It is also recognised that strategic growth will deliver 'attendant transport and infrastructure improvements'. There are opportunities through this strategy and the specific location 'West of Stonehouse' to make the area a sustainable workplace location.
- 2.9. The corollary of the Mini-Vision for the area is that it identifies that development outside of the strategic location 'West of Stonehouse' will be minimal. Whilst it is mentioned that villages such as Eastington will be allowed to thrive, this is in the context of their role as a Settlement with Limited Facilities and protecting and improving aspects that make them pleasant and viable places to live. This is necessary to achieve a number of the Guiding Principles for the area, including:

"The physical distinctiveness of Stonehouse will be retained: avoid physical and visual amalgamation by resisting development at key 'gaps'" (Priority 3);

"Acknowledge role of the A419 as a 'gateway' to Stonehouse and to the Stroud Valleys beyond. Avoid urbanisation of character and linear sprawl" (Priority 8); and

*“Conserve and enhance the area’s heritage assets and secure high quality, distinctive design, in keeping with local identity and character - with particular emphasis on Stanley Mills conservation area and the Industrial Heritage Conservation Area”
(Priority 9)*

- 2.10. The application proposals are fundamentally at odds with these priorities for the local area. The scale and strategic nature of the proposals are in no way ‘minimal’ and will significantly alter the pattern of land uses across the cluster and affect the overall settlement pattern. The impact on the A419 corridor as an urbanizing influence will be significant. Whilst the scheme might deliver local infrastructure improvements associated with the impacts of the development in practice these are contrary to the nature of schemes already identified to enhance the role of the town centre and settlement at Stonehouse.
- 2.11. The proposals also present no clear evidence of their contribution in allowing Eastington to ‘thrive’. The nature of development is unrelated to its role in the settlement hierarchy (Tier Three, Policy CP3) and the outcomes in terms of environmental impact, traffic movements and the use of services and facilities is unclear.
- 2.12. The application proposals contrast sharply with the pattern of development across the Parish which supports the environment and character of the main village at Alkerton. It is of fundamental importance that delivery of the strategic location ‘West of Stonehouse’ happens in a coordinated manner as a specific focus for development. The strategic location is essentially entirely located within Eastington Parish. It is possible in principle for this location to be successfully integrated within the wider parish (and function primarily as an extension to Stonehouse) through careful use of conditions and details such as landscape and layout. These provisions are set out through the criteria of Policy SA2. However, this can only be achieved with careful regard to the remainder of parish, including recognition of the settlement pattern and extensive rural hinterland around the separate hamlets and main village at Alkerton. The strategic location ‘West of Stonehouse’ is intended to have a limited impact on these connections and should protect and improve these aspects of the area. Doing so is essential as part of the principle objectives of the NPPF to reflect the role and character of different places.
- 2.13. The application proposals for this scheme have not been prepared or presented in a way which safeguards such outcomes. Introducing further strategic scale development at a location which affects the setting of a number of individual settlements in the parish and the connections between them is contrary to the objectives for the area. In short, the extensive urbanizing characteristics of the scheme are likely to deliver a marked change in the relationship between different places. In-particular, the role of Alkerton as the principal settlement in the parish is likely to be weakened by any impediment to the free movement of people and traffic.
- 2.14. Although the application proposals identify opportunities for new pedestrian crossings and access improvements along the A419, these would be provided in the context of fundamentally urbanizing development out of keeping with local character and the existing road corridor.

3. Consideration of Strategic Development within the Plan-Making Process

3.1. The supporting evidence for these application proposals does not make reference to the history of either the application site or 'reasonable alternatives' considered for the cluster as a whole through the plan-making process. This is a critical omission and, in short, overlooks that the application site was assessed as part of the Sustainability Appraisal process for the adopted District Local Plan.

3.2. Paragraph 11.3.3 of the Sustainability Appraisal of the Stroud District Local Plan explains that:

“Reasonable site options were identified on the basis of –

A) Availability / likely deliverability of sites as established through a separate process of Strategic Housing Land Availability Assessment (SHLAA) and ‘Call for Sites’

B) The preferred broad spatial strategy, i.e. ‘dispersed concentration’

C) An initial understanding of the merits of broad areas and sites, as established through consultation (2011 & 2012).”

3.3. This provides a total list of 97 sites. The application site is broadly shown on Sites 2 and 22 as 'Employment Site Options'. The above criteria demonstrate that the Preferred Option of 'dispersed concentration' – essentially focusing growth at a smaller number of locations within or adjacent to larger settlements with a focus on areas where there is the potential for public transport and walking/cycling infrastructure improvements – has not been reached without detailed consideration of the implications for alternative strategies. The sites are shown on the following plan.

Map 4: Site allocation options and landscape assessment areas west of Stonehouse

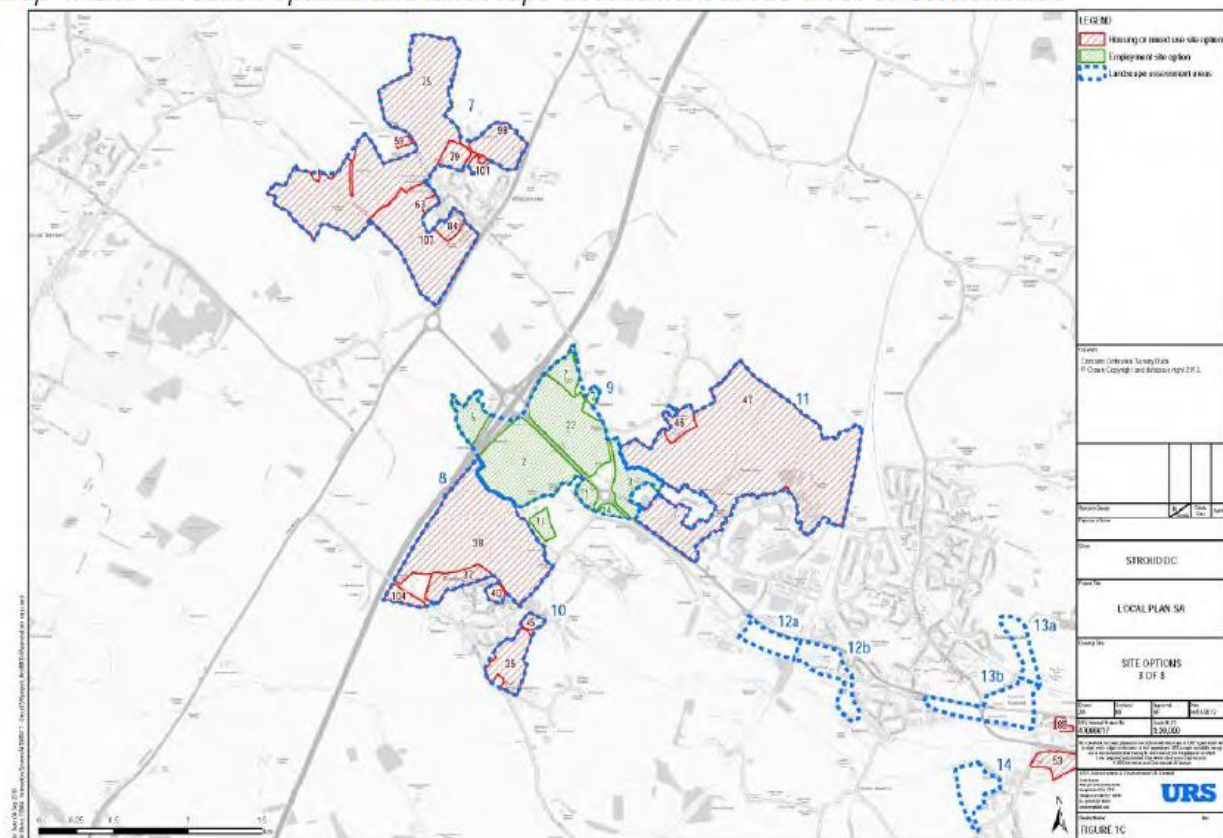


Fig 1. Reasonable Alternatives considered within the Sustainability Appraisal for the Stroud District Local Plan (2012)

- 3.4. As part of this process, the evidence demonstrates that the identification of significant potential sites near to Eastington within the SHLAA (in-particular “Site 38” from the SA) led to its detailed consideration as part of the plan-making process. As late as the October 2011 Core Strategy Discussion Paper ‘Towards a Preferred Strategy’ the potential inclusion for the development of up to 2,000 dwellings ‘North of Eastington’ (potentially with mixed-uses) was considered a potential component of ‘Strategy Options’ A or B (2 of the three considered most popular for the area). The ‘Cluster’ approach can broadly be shown to be relevant to identifying the most appropriate strategy at this stage. Growth at Eastington was considered alongside growth ‘West of Stonehouse’ as part of options within the “M5 Catchment”. The ‘employment option’ later included as a reasonable alternative in the SA is not shown in this document. However, it is entirely logical that it was identified as part of the ongoing consultation in 2011 and 2012 as part of considering the strategic contribution the area as a whole might make to housing and employment needs.
- 3.5. It is important to highlight that the conclusions on the emerging “Preferred Strategy” in the October 2011 assessment identified a “hybrid approach” based on the opportunities and weaknesses of different locations and which did not include development at Eastington.

However, it is appropriate that the area was reflected as a 'reasonable alternative' for the remainder of the plan-making process.

- 3.6. Various key findings from the assessment of the 'Option' at Eastington highlight key reasons for it being rejected in planning terms. In large part, many of these considerations are equally relevant to the application proposals for this scheme.
- 3.7. For example, in relation to 'Economic Impacts, Regeneration and Employment' the location was recognised as potentially drawing employment demand away from the Stroud Valleys; having little positive impact on employment growth in the south of the District; and providing more convenient access to service and employment hubs in other locations (e.g. Bristol, Gloucester) with would potentially provide fewer benefits from use of local centres.
- 3.8. In terms of self-containment, the assessment said the location "*Close to M5 junction 13, which may lead to long out- and in-commutes (between Eastington and Gloucester, Cheltenham, Bristol in particular)*" and that Stonehouse town centre was too remote – "*Most trips to Stonehouse, Stroud and beyond would be by car*". The need for potential infrastructure improvements due to intensification of traffic on the A419 was recognised.
- 3.9. The assessment also noted with regards landscape, character and environmental sensitivity that the location "*would be conspicuous from southbound M5 – northbound, to some extent screened by the northerly sloping topography, combined with the motorway cutting and embankments around the A419 junction 13 roundabout.*" It was identified that the development would risk dwarfing the village of Eastington and change the character of the area – referencing in-particular the impact of development within the Industrial Heritage Conservation Area.
- 3.10. The Sustainability Appraisal (2013) provides confirmation of these findings as the result of a comparative site assessment based on indicators drawn from the sustainability objectives and indicators. For example, land at Grove Farm (north of A419) secures 'red' outcomes (from the Red-Amber-Green assessment) in terms of impact on Listed Buildings and poor cycling links as well as having medium sensitivity in landscape terms. The Sustainability Appraisal at this stage confirmed that the alternative site option to provide a strategic employment option at M5 J13 did not have advantages in sustainability terms as a distinct location or within the strategy as a whole.
- 3.11. Taken together, these two sources provide the comprehensive evidence to identify the most appropriate broad spatial strategy for the District and the sites best suited to deliver this approach. They represent a thorough justification against directing additional strategic development to the 'Stonehouse Cluster' as part of the adopted Stroud District Local Plan.
- 3.12. Given the extent to which the application site and surrounding areas have been assessed in the past, Eastington Parish Council is extremely concerned that permitting a large strategic site outside of the Local Plan on the basis of speculative proposals would significantly prejudice future plan-making activity in the area.

3.13. In the circumstances of a recently adopted Local Plan, the conventional approach to 'prematurity' with respect to the application proposals may appear less relevant. However, the plan itself does make provision for a Local Plan 'early review'. Policy CP2 indicates the prospect for an 'early review' depending on shortfalls that may arise from neighbouring areas in terms of delivering housing and employment needs. However, the provisions for plan review seek to ensure that any ability to meet unmet needs in Stroud District ensures that these can be provided for in sustainable locations.

3.14. National Planning Practice Guidance (NPPG ID: 21b-014-20140306) states that:

“Arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or Neighbourhood Planning”

3.15. In the case of these application proposals, it should be highlighted that the significant scale of development proposed would pre-determine decisions relevant for any future review of the Local Plan. For example, it would alter and prejudice decisions on the future balance in the supply of land for jobs and housing. In effect, any decisions that might look to meet unmet housing need for neighbouring authorities will need to take into account that the adopted District Local Plan would not in principle contain provision for the supply of housing needed to accommodate the increased capacity for job growth from the “Eco-Park” scheme. The overall increase needed in the requirement for housing may ultimately be greater.

3.16. In addition, having granted permission for strategic development adjacent to the M5 J13 would prejudice decisions on the location of future associated development. This would be contrary to previous findings that those locations, such as land ‘North of Eastington’ were not the most appropriate locations for the wider spatial strategy. For example, there might be a *de-facto* basis to say that land near to this application site was more sustainable due to the employment uses recently permitted nearby. However, this would in reality reflect the decision to create a new centre for development and might help to mitigate long-distance flows. However, in reality it would undermine and fail to reflect to concentrate development at the most sustainable existing centres.

3.17. Whilst it is accepted that the “Stonehouse Cluster” / “M5 corridor” might reasonably be considered in the future, this should be in the context of the broad process of future plan-making as opposed to being directed by previous planning decisions.

4. Impact on Landscape, Heritage and Local Character

- 4.1. In broad terms, the applicants have undertaken extensive work on the characteristics of the application site in terms of its contribution to landscape value and heritage significance. A range of evidence has been produced – in-particular the “Heritage Assessment” and Appendix 7.1 of the ES and Landscape and Visual Impact Assessment in the documents at Appendix 10. Chapters 7 and 10 of the ES deal most closely with these aspects. The Planning Statement provides an overall synthesis of this material and the local and national planning policies and guidance to which the application has had regard. As would be expected of any application prepared on the basis of a comprehensive assessment, there are various aspects of policy and guidance with which the proposals can be shown to accord.
- 4.2. Notwithstanding the above details, the proposed development would fundamentally change the appearance and character of the immediate area. There are key aspects of local character and evidence overlooked by the application material which more fully indicate the harms that would arise locally as well as in the wider landscape. These are set out below:

Heritage

- 4.3. The application material acknowledges that a significant proportion of the application site identified for the ‘Sports Complex’ falls within the Stroud Industrial Heritage Conservation Area (IHCA). This mainly rural conservation area stretches along the length of the Stroudwater canal and the valleys of the River Frome and Nailsworth Stream which link the historic mill sites of the Stroud valleys. The conservation area serves an important role in recognising and protecting the historic transport infrastructure routes and the unique context of Stroud’s industrial legacy.
- 4.4. The settlement pattern within the Parish of Eastington including those parts within the IHCA, but also areas affecting its setting and across the Parish as a whole, fundamentally reflects the Conservation Area’s importance in terms of the relationship between the built and natural environment. The occurrence of undeveloped green spaces along the length of the canal is very important to its character. They act as physical and visual buffers between historically isolated mill groups and settlements, allowing an appreciation of the historic distinction and physical separation between these sites. The locally distinctive pattern of settlement derives from the historic coexistence of agriculture and industry. Preservation and enhancement of the Conservation Area provides a valuable insight of these features land use patterns; requiring significant regard be had to areas of rural character, openness and agricultural land use.
- 4.5. Evidence produced by the applicants (e.g. see ES Appendix 7.9, Para 6.15) highlights that detailed Character Appraisals were not completed or made available online by Stroud District Council in relation to the individual Character Areas of the IHCA most closely associated with the application site (namely “Newton and Chipmans Platt”, “Meadow Mill” and “Fromebridge to Chipmans Platt”). This lack of available information is regrettable. The consultants preparing the “Heritage Assessment” have subsequently relied upon a relatively limited application of the much broader analysis provided in Volume 1 of the Industrial Heritage Conservation Area Statement (2008). This broad analysis, unsurprisingly, overlooks many of the distinct characteristics and

relationships between different areas than might be achieved by a finer-grained analysis of individual areas.

- 4.6. Paragraph 6.15 of the “Heritage Assessment” specifically notes that analysis has focused on the ‘Western part of the IHCA’ as considered by the Conservation Area Statement. Chapter 3 of Volume 1 of the Conservation Area Statement (2008) in-fact provides numerous other findings in the character summary that may be of local significance and are largely overlooked in the Heritage Assessment. For example, in relation to ‘Green Space and Gaps’:

“The distinctive, rhythmical pattern of mills, dotted at intervals along the linear Study Area, is well-appreciated from the perspective of the canals ... By contrast, sometimes the main roads have become developed in a linear fashion, which blurs this perception. Gaps between mills, industrial groups and clusters of settlement are particularly crucial to the special interest and appearance of this linear conservation area since, by its nature, much of its character is perceived in transit – passing through the area or along the transport routes.” (Paragraph 3.84)

And

“The green spaces along the IHCA are as important to its character as the built environment, acting not only as a visual setting for the buildings, but also providing a valuable insight into the historic co-existence of agriculture and industry.” (Paragraph 3.85)

- 4.7. It is also said specifically in relation to canals:

“The vast majority of the canals corridor has a naturalistic informality – yet this is not just a result of disuse and neglect. These were always fundamentally rural canals. The two canals generally bypassed the centres of towns and villages (virtually all settlement along the Stroudwater occurred post-canal)” (Paragraph 3.90)

- 4.8. Paragraph 3.68 of the same chapter recognises that “Mills, and former mill sites, punctuate the length of the conservation area and there is often a strong visual dialogue between them – like the church towers of the Vale, the mills’ landmark chimneys and water towers make striking focal points” and were historically visually isolated in the landscape prior to the development of road and canal corridors. In terms of the relationship between different built developments in the context of the application site, Paragraph 3.72 states:

“Early C19th The Leaze (now ‘Eastington Park’) was built for mill owner Henry Hicks – an extremely powerful man [100]. His house was purpose built, on open land, at some little distance from his three Eastington mills (Millend, Churchend and Meadow Mill), but within easy reach. It illustrates the wealth and social aspirations of late 18th and early 19th century mill owners locally: the house and grounds aspire (in terms of architecture, scale and setting) towards that of the landed gentry”.

- 4.9. A clear understanding of the relationship between these different elements is considered to support different conclusions to those in the applicants supporting material. For example, Paragraph 6.71 of Appendix 7.1 finds in relation to agriculture:

“the current field morphology is associated with modern consolidation of fields, and as such the agricultural elements of the Character Area cannot be seen representative of the historical landscape associated with the parish of Eastington.”

- 4.10. These conclusions are not clearly supported by a more thorough assessment of the relationship between the application site and its surroundings. For example, the presence of “Ridge and Furrow” features in the east of the site, along with the overall importance in agriculture and open space in maintaining the settlement pattern and local identity demonstrate the wider landscape impact of the application proposals.
- 4.11. In principle, the land uses of the Nature Conservation Area might to a large extent retain the openness and rural character in this part of the Conservation Area. This is true to a much lesser extent for the land uses proposed in the ‘Sports Complex’ and for the application site as a whole. Whilst sports pitches themselves might preserve openness, the presence of a major sports stadium and all that goes with it – parking, hardstanding, office floorspace and ancillary outbuildings – cannot be considered to secure and safeguard the distinctive characteristics of the site and its contribution to local character. The proliferation of large areas of modern built development would substantially urbanise the area alongside the effects on amenity from noise and lighting associated with the stadium and other uses. Whilst landscaping and control by condition offers some scope to mitigate these impacts this would be limited viewed against the overall scale of the proposals.
- 4.12. In the context of local impacts on the Parish of Eastington, these effects on local character are better regarded in terms of the impact of the application site as a whole. The importance of the overall settlement pattern to local character in the Parish derives from the separate identity of outlying hamlets such as Westend, Nupend, Churchend and the historic development at Chipmans Platt. The overall extent of development, and particularly the “Eco-Park” aspect of the proposals north of the A419 would bring modern built development close to the boundaries of a number of these locations (and along much of the frontage with Grove Lane) effectively fostering coalescence and eroding the settlement pattern.
- 4.13. The proposals would seriously undermine the essentially rural quality of this important open space and the contribution it makes to the distinctive character and appearance of the Stroud Industrial Heritage Conservation Area as well as local character and the historic settlement pattern when viewing the application site as a whole.
- 4.14. To support our assessment, it is possible to further highlight evidence in the Eastington Parish Character Assessment – prepared in January 2016 to support the submission version of the Eastington Neighbourhood Plan. The Character Assessment provides a detailed analysis based on the sub-division of the Parish into five main ‘Character Areas’. The ‘Frome Canal Corridor’ and ‘Northern Hamlets’ are both relevant to the application proposals (north and south of the A419

respectively). The assessments are valuable in setting out more widely the settlement pattern, land uses, areas of open space and historical features across each area. This is also achieved by breaking down the Character Areas to relevant sub-parcels to highlight their specific features. For example, sub-parcel 'Area C' for the Frome Canal Corridor' quotes from the Stroud Landscape Assessment (2000) to reflect the contribution of the area as 'pastureland':

"it is important to retain the pastoral river valley qualities of the River Frome, as there are few landscapes of this nature within Stroud District. Much of this character area falls within the River Frome valley. It includes a restored section of canal that is an important leisure facility and is sensitive to change."

- 4.15. The 'Stadium Complex' aspect of the application site falls within this sub-parcel.
- 4.16. Finally, the Character Assessment identifies areas considered particularly sensitive to change. For the application site, these broadly comprise the area containing the Roman Villa and eastern edge of the Sports Complex site; and approximately the northern third of the Business Park site preserving the separate identity of hamlets along Grove Road.
- 4.17. Since the applicants prepared the material for the application proposals the Eastington Neighbourhood Development Plan has been submitted for Examination. Although this progress in events may have been outside the applicant's capacity to reflect the changes, the submitted plan nevertheless represents substantial revisions to the policies (including order and numbering) and content quoted in the Planning Statement at Paragraphs 4.19-4.20. There has been substantial effort to review the policies, including through the NPIERS 'health-check' process. Whilst it may only be afforded limited weight at this stage, it forms an important material consideration alongside relevant supporting evidence (such as the Eastington Parish Character Assessment).
- 4.18. The nature of the conflict with the NDP – aside from development outside of Settlement Development Limits – is not expanded upon in detail within the planning statement. There should be no doubt that the application proposals remain contrary to a number of key policies and aspects of the NDP which comprise important considerations beyond the spatial location of development. In-particular (from the submitted NDP) this includes Policy EP5 requiring proposals to conserve the unique character and quality of the countryside helping to characterize the separate identity of settlements in the parish. In such cases, development should be designed in character, scale and appearance with the form of the hamlet and the any proposals for sport and outdoor recreation are of a scale appropriate for the benefit of the local community. Policy EP7 makes specific provisions to ensure that development "respects the integrity, character and appearance of adopted Conservation Areas including the Industrial Heritage Conservation Area" amongst other criteria such as requiring a high standard of design to reinforce local distinctiveness. It cannot be considered that the scale of the current application proposals – brought forward for a large strategic development on a speculative basis – are capable of complying with these provisions in the wider interest of managing development across the parish.

Landscape

4.19. The commentary above in relationship to the local character and identity of Eastington Parish should also be read in relation to the wider landscape issues. It is acknowledged that the applicants have submitted detailed Landscape and Visual Impact Assessment as part of the application material. The majority of its findings are relatively uncontentious although it might be considered appropriate for the Local Planning Authority to undertake its own assessment to verify these findings.

4.20. For example, the conclusions in the Planning Statement at Table 3 recognise that in relation to the conflict with Policy CP11 are welcomed in-part:

“With regards to Criteria 1, whilst the landscape and visual effect chapter of the ES does conclude some residual adverse significant effects, it does demonstrate that overall the Proposed Development, along with type and scale of activity, is suitable to the local context”

4.21. Notwithstanding the comments below in relation to whether all relevant components of the local landscape are fully addressed, these findings indicate significant harm in relation to the proposed scheme. The main issue in reality is whether proposals for a large scale strategic development - in a location not supported or identified for development in the Local Plan and where further urbanizing influences are to be avoided – are capable of being found suitable in the local context? For the reasons set out throughout these representations, this is not the conclusion which should be reached. Landscape therefore represents another component contributing to significant and demonstrable harm in the planning balance.

4.22. In relation to the immediate locality of the application site any review or update of the evidence presented should take account of the Eastington Environmental Character Assessment (see Appendix ‘EPC A’ to these representations) in order to provide a detailed understanding of place.

4.23. A key concern is that Table 10.2.2 at Appendix 10.2 to the Environmental Statement (LVIA Baseline Assessment Methodology) fails to recognise Paragraph 170 of the NPPF, in-particular:

“Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity”.

4.24. Within Stroud District, this evidence is split across various sources (such as the Draft Conservation Area Statement (2008)) but represent important considerations for the landscape in relation to the application site. National Planning Practice Guidance (ID: 8-001-20140306) highlights that Character Assessment *“is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place”*.

4.25. The LVIA approaches the Industrial Heritage Conservation Area SPD from the position of reviewing detailed policies and design criteria. It would be more appropriate, in terms of

reflecting the relationship between the natural and historic landscape, to repeat relevant overarching priorities, such as:

“Priority 1: The desirability of preserving or enhancing the legibility of historic settlement patterns, and minimising the erosion of visual distinction and physical separation between settlement groups / mill complexes, should be borne in mind when interpreting and applying policy or design guidance.”

- 4.26. Although the LVIA at 10.4.2 acknowledges the Industrial Heritage Conservation Area designation, the relationship of this area with the wider landscape and settlement pattern is not considered to be fully acknowledged. For example, Chapter 10 of the Main Environmental Statement (Paragraphs 10.56-10.59) describes the landscape context without reference to the historic features or settlement pattern. Conversely, the description highlights the “urban fringe” properties of the surrounding area, emphasizing the combination of built development and major infrastructure within the rural areas.
- 4.27. Paragraph 156 of the NPPF highlights the “*conservation and enhancement of the natural and historic environment, including landscape*” as priorities for plan-making. The LVIA fails to acknowledge that within the adopted Stroud District Local Plan, the Guiding Principles for the ‘Stonehouse Cluster’ seek to avoid further urbanization of the A419 Corridor. This is a key aspect of directing strategic growth towards the ‘West of Stonehouse’ location and recognising the sensitivity of further change.
- 4.28. It is evident that the application proposals are contrary to these principles and should be given greater weight in the LVIA, including as part of the cumulative impact of change in the area.

5. Relationship with the Local Enterprise Partnership Strategic Economic Plan and wider Functional Economic Market Area

- 5.1. The application proposals aim to present a relationship and clear accord with the objectives and priorities for the Strategic Economic Plan prepared by the “GFirst” Local Enterprise Partnership. However, it is evident upon closer reading that the application proposals reflect a clear conflict with the preferred locations and specific economic strategy put forward within the SEP. Due to the lack of clarity or certainty in the nature of economic development likely to arise from the proposals at “Eco-Park” these impacts risk affecting the LEP area on a number of levels. At a strategic level, this risks undermining the delivery of preferred locations such as M5 J9 and J10 as the key components of the “Growth Zone”; in-turn threatening the associated infrastructure delivery associated with these schemes.
- 5.2. At the local level, the Strategic Economic Plan has been developed in close parallel with the adopted District Local Plan and shares a number of key priorities – including a specific focus on delivery of the Gloucestershire Renewable Energy, Engineering and Nuclear (GREEN) skills programme at the de-commissioned Berkeley power station. Measures to support delivery of this scheme, such as improvements to the A419 corridor at Stonehouse, have been specifically

conceived in relation to the project. Representations prepared separately by Helix Transport Consultants on behalf of Eastington Parish Council demonstrate how this relationship risks being compromised by the additional and un-programmed mitigation required in relation to the “Eco-Park” proposals. It is also important to reflect that Appendix 4B to the SEP – setting out the business case for the GREEN skills centre – is also based on a clear understanding of the strategy in the Local Plan itself:

“Poor connectivity also acts as a constraint on labour supply, both for major urban employment areas, such as Gloucester, and for businesses located in Stroud and Stonehouse (both of which are identified as preferred strategic locations for growth – 2,000 to 3,000 new jobs are identified on land to the west of Stonehouse alone, as contained within the submission version of the emerging Stroud Local Plan). The Stroud District Employment Land Study (2013) recommended that conditions at existing employment sites should be improved to increase their market attractiveness.”

- 5.3. The application material appears to fail to account for Policy E12a of the adopted District Local Plan giving specific support for delivery of the GREEN skills programme through retention of the Former Berkeley Power Station site in employment use. Although not specifically included as a ‘strategic allocation’ of employment land within the District Local Plan, the SEP Business Case (Appendix 2 Option B) clearly demonstrates opportunities to deliver up to 3,000 new jobs, protect a further 350 jobs and achieve 2,500 jobs and 200 apprentices per annum related to training. Such recycling of existing stock and the associated scope for job creation is not detailed in the applicants’ Appendix A to the Planning Statement – ‘Employment Land Assessment Technical Note’.
- 5.4. Whilst the Planning Statement for the application refers frequently to the overall scale of growth supported by the SEP, the Inspector’s Report for the adopted District Local Plan has already concluded the range of economic forecasts, including those for jobs growth and GVA, fall within those used in the SEP. Any concerns regarding whether the Stroud District Local Plan would enable the SEP to be delivered have been overcome.

Relationship with Plan-Led Economic Development

- 5.5. In summary, the justification for the B-Use employment generation provided as part of the application proposals relies on broad, generic statements in relation to the nature of economic development which might be provided. In principle, this is contrary to the objectives of the NPPF (Paragraph 21) in seeking a clear economic vision and strategy, providing appropriate support for existing business sectors, promotion and expansion of clusters and identifying priority areas for regeneration and infrastructure improvements. This is important to encourage sustainable economic growth.
- 5.6. It is not possible from the application material to ascertain clearly what specific contribution the application site seeks to make towards economic development. There appears to be competing priorities, for example Paragraph 4.53 of the Planning Statement:

“the application proposal also produces modern business premises for the District at the right time and in the right place to supplement the strategy of the Local Plan (discussed further below and in Appendix A) ... which has not properly embraced the locational requirements set out by the Growth Plan and the only allocation going forward in this area is the retention of an existing allocation at Stroudwater Business Park.”

And Paragraph 4.65:

“The remaining supply of suitable employment land within Stroud District is at an all-time low with only remote and less accessible sites remaining in the District and as a consequence many existing local businesses having no alternative locations to accommodate their expansion requirements. This has been coupled with the loss of older employment land being redeveloped into more valuable uses without any replacement provision being made.”

- 5.7. The contrast between these two approaches is stark. Whilst the former infers and conflates the need for additional land at M5 J13 to compete with much larger (and strategically preferable) supported at M5 J9 and J10 in the SEP, the latter refers to a different local employment market. The type (and value) of premises required by such occupiers are likely to be markedly different although the nature of replacement provision is not clearly specified. This makes ascertaining the contribution to sustainable economic development that the location might make effectively impossible. For example, the nature of any ‘replacement provision’ may have significant effects in terms of the application of sequential and impact assessment for town centre office uses (NPPF Paragraphs 24 and 26). It is also necessary to assess the viability and affordability implications depending on whether the likelihood is for units to be provided on the basis of a bespoke ‘build-to-suit’ or speculative development marketed to a range of future occupiers. Either type of delivery would be unlikely to appeal equally to different market sectors.
- 5.8. Furthermore, the application material is unclear as to the nature of any occupiers presently identified or the nature and phasing of delivery that might be necessary to enable delivery of the “Sports Complex” and infrastructure improvements. This might have significant implications for the overall objectives that the site might be able to achieve.
- 5.9. If it cannot clearly be shown that the scale of economic development is necessary to ‘enable’ development of the stadium then – taking account of site-specific harms – the overall scale of proposals might be significantly reduced or the sequential assessment of potential alternatives revised accordingly. If evidence were to clearly demonstrate the need for the ‘Green Technology Hub’ to support delivery of the stadium, the application material must explicitly set out the risks of non-delivery from the commercial elements and ensure that alternative uses (such as retail) are not ultimately explored to facilitate the scheme.
- 5.10. As a result of the significant uncertainty in the nature of development which might arise from these speculative application proposals in a location which is not in accordance with the

development plan, statements such as the following Paragraph 4.56 from the Planning Statement are made without sufficient basis to justify approving the scheme:

“The social aspect of sustainability is met in that the Proposed Development will result in the creation of high quality environment and comprises a compatible use in keeping with the neighbouring uses in the immediate surrounds of the site.”

6. Contribution to Sustainable Working Patterns and Job Growth

- 6.1. The evidence presented to support the application presents a high-level analysis of the prospects for further job creation in Stroud District in an attempt to demonstrate the proposals’ potential contribution towards further sustainable economic growth. This material requires more careful analysis to appreciate the site’s relationship with these broader patterns.
- 6.2. The significant conflict lies in the statements at Paragraph 11.17 in Chapter 11 (“Socio-Economics”) of the Environmental Statement which explains data from the 2011 Census showing that 71% of the jobs in Stroud District were taken by residents of the area. The applicant’s logic follows that there will be a greater proportion of jobs taken by local residents and greater socio-economic multipliers as a result.
- 6.3. Conversely, the applicants later support their case at Paragraph 11.56 in highlighting the relatively low Jobs Density in Stroud District and the net outflow of 7,200 commuters per day recorded in the 2011 Census.
- 6.4. Further analysis is needed to focus on the following aspects:
 - Projections of change in the working-age population;
 - Temporal change in local employment between 2001 and 2011;
 - Temporal change in Jobs Density since 2001; and
 - Change in numbers of those working but not resident in Stroud District
- 6.5. This analysis can be presented as follows (see over):

Stroud District	2001	2011
Population Aged 16-64	67,300	70,400
Jobs Density	0.67	0.82
Estimate of Stroud Residents in Employment	52,375	57,745
UK Residents with Workplace Address in Stroud¹	43,934	50,506
Stroud Residents with Workplace Address in Stroud	34,263	37,219
Stroud Resident – Workplace Address Outside Stroud (Estimate of Out-Commuting)	18,112	20,526
2001-11 Change in Census Estimates of Employment in Stroud	N/A	+6,572
2011-11 Change in Census Estimates of Stroud Residents Employed Locally	N/A	+2,956
Estimate of (Gross) In-Commuting to Stroud²	9,671	13,287

Table 1- Commuting Flows and Jobs Density within Stroud District 2001 and 2011 (Source: UK Census)

- 6.6. The outcomes reveal that Jobs Density within Stroud has already increased significantly since the 2001 Census. In-part this reflects the relatively limited change in the population aged 16-64 (which the District Local Plan evidence shows is likely to experience relatively limited growth in the future). In this scenario, any employment growth helps the District appear to have a higher Jobs Density.
- 6.7. It is further shown that the increase in the ‘workplace population’ of Stroud (those employed in the District) has been greater than the growth in the ‘workplace population’ made up from those already resident in Stroud. This implies that over half of the new employment recorded in the area between 2001 and 2011 has arisen due to an increase in in-commuting to the area. Whilst not inherently unsustainable, much will depend on the nature and location of additional opportunities for employment. This reinforces the strategy in the adopted Local Plan to focus development and regeneration on existing centres with the best sustainable transport options.
- 6.8. Proposals which might help to reduce net out-commuting should also be considered on the same basis. Across the District as a whole, the location adjacent the M5 J13 is not considered to offer

¹ Estimate includes those working at or mainly from home or with no fixed place of work, although the methodology for showing these groups changed between the 2001 and 2011 Census

² May not sum to total due to presence of those in employment not usually resident in the UK

the most effective opportunities for use of sustainable transport, meaning that the overall positive effects may be reduced.

- 6.9. It is noted that some analysis of existing mode of travel to work analysis is undertaken for comparator sites at Appendix 12.2 to the Environmental Statement ('Framework Travel Plan') albeit not considered in the wider socio-economic chapter. In any event, the examples used (e.g. Stroudwater Business Park) are materially different from the application proposals and do not take account of the risk of the application proposals changing the balance between homes and jobs provided in the District Local Plan.
- 6.10. It can also be shown that gross levels of out-commuting have increased alongside an increase in the resident population employed locally. Although there has been some downward change in the relative rate of out-commuting, these trends are limited as a whole. The evidence base for the adopted Local Plan accepts that the commuting choices of existing residents cannot in reality be easily controlled through policy decisions or the release of employment land.
- 6.11. Based on the above analysis, it does not simply follow that an increase in Jobs Density (as observed between 2001 and 2011) would inherently reflect more sustainable travel patterns or the uptake of jobs by local people, which already run at a relatively high proportion of the total. This also needs to take into account the relatively limited projected growth in the population aged 16-64. The location of the application proposals alongside the strategic highway network at M5 J13 is likely to mean that the combined effect in employment changes will be particularly acute and encourage in-commuting as much as reducing out-commuting.
- 6.12. It should also be highlighted that the same analysis could be repeated at a lower level geography (principally the Middle Super Output Area of Stonehouse closest to the application site) to show more local Jobs Densities, use of sustainable transport and existing levels of in and out-commuting.

Sustainable Development and Sustainable Transport

- 6.13. The applicant's Planning Statement, in response to Policy EI12 ('Promoting Transport Choice and Accessibility') at Table 3 explains that:

"The Proposed Development will deliver parking spaces in line with that set out within Appendix 2 of the Local Plan. As such, it is considered that the Proposed Development is compliant with the policy as a whole."

- 6.14. It should be highlighted that the relevant standards in Appendix 2 indicate a requirement for 1 parking space per 35sqm of B1(a) Office Floorspace in locations outside Town Centres and for developments over 1000sqm. Based on the applicant's assumptions for job creation of approximately 1 new job per 13sqm of B1 floorspace, this would rely on approximately 2/3rd of workers either car-sharing or travelling by non-car modes. Whilst these effects would inevitably vary depending on the nature of specific occupiers (e.g. hours of work, employment density) if the scheme delivers the stated benefits in employment terms there are likely to be significant issues in terms of parking capacity. The scheme would otherwise rely on the substantial uptake of

sustainable transport, which is not considered realistic in this relatively isolated location adjacent to a major motorway junction.

7. Functionality of Eco-Park, Consideration of Alternatives and Estimates of Job Creation

7.1. Many of our earlier comments in relation to uncertainty over the potential delivery of employment land within the “Eco-Park” Scheme are equally relevant to this section. However, it is also necessary to highlight the risk of additional harm this raises in relation to the impact on existing centres and consideration of the overall scale of potential benefits.

7.2. The description of development for the application proposals at Chapter 5 of the Environmental Statements sets out:

“Whilst it will be built to the highest sustainable methods of construction, the GTH will also be critical as enabling development for the southern half of the Site. However, the GTH will be for green technology companies and will look to achieve such occupiers as opposed to more traditional office uses. As such, it will be unlikely to compete with other B1 uses located in town centres, and other business parks elsewhere. Furthermore, as explained above, the B1, B2 and B8 uses will complement each other potentially through a supply chain approach.” (Paragraph 5.17)

7.3. This is an important part of the justification for not disaggregating the nature of the proposals in the subsequent sequential assessment. However, the clearest indication of the stated potential for job creation from the proposals is given at Paragraph 11.87 and Tables 0.5 and 0.6 in Chapter 11 of the Environmental Statement:

	Sqm Floorspace Proposed	FTE Job Estimate (deducing 10% Vacancy Estimate if relevant)	Job : Floorspace Ratio Assumed
GTH – B1 Uses	38,100	2,858	13.3 sqm per job
GTH – B2/B8 Uses	22,800	608	37.5 sqm per job
Stadium Complex – B1 Ecotricity Uses	4,000	67	59 sqm per job

Table 2: Job:Floorspace Ratio Based on Application Material

7.4. The evidence presented to a large extent contradicts the broad statements in the description of development. The basis for the different ratios and employment densities assumed is not immediately apparent in the application material. There is no one authoritative source for employment densities, but “*Employment Densities: A Full Guide, July 2001*” (ARUP) provides estimates for a broad range of potential B1 Uses. In comparison to the table above, B1 Science Parks are stated to have employment densities of around 1 job per 29sqm. Conversely, higher density uses such as Call Centres are assumed at similar ratios to this application – approximately 12.8sqm per job. The sustainability implications for a high volume of such uses in a location

outside main centres are considered to be significant. Other comparable evidence³ suggest 'General Office' densities around 1 job per 12sqm listed separately from IT / Data Centre and B1(c) Business Park uses at 1 job per 47sqm.

- 7.5. In effect, the position is reserved to deliver development and floorspace that would more typically compete with town centre office uses in-particular. Conversely, the estimates for employment generation on B2/B8 floorspace uses could well be exaggerated depending on the extent of distribution and highly automated operations. Ultimately, it would be expected that delivery will be driven by the market and identification of occupiers best able to deliver the enabling development it is said that the stadium requires.
- 7.6. Equally, the proposed level of job provision in the offices within the Stadium Complex is significantly below what could reasonably be accommodated in traditional B1-Use premises.
- 7.7. Alternatively, the application material represents a significant over-estimate for job creation, which reduces overall benefits and also masks the conflict with other sites in the adopted District Local Plan such as the GREEN project at Berkeley Power Station.
- 7.8. It should also be simply stated that the overall balance and make-up of uses in any future scheme may be subject to sufficient revision and the application material acknowledges this. Given the lack of policy support or safeguards for the site, this should significantly reduce the weight given to the overall Masterplan and stated benefits and performance in socio-economic terms.

Sequential Test

- 7.9. The approach to the sequential test and consideration of alternatives is of some concern, in-particular in terms of the potential impacts on the Parish of Eastington. Comments such as that at Paragraph 5.11 of the Planning Statement, reflecting that the location is arguably 'edge of centre' (though not treated as such) demonstrates a disregard to the Guiding Principles of the Stonehouse Cluster – looking to avoid urbanization of the A419 Corridor.
- 7.10. The limited range of large scale alternative sites considered in the sequential assessment relies on considering the combined requirements of the intended operator (Paragraph 5.28). This provides a context to avoid disaggregating the nature of proposed uses; in turn not looking at 'need' for individual components of the scheme or flexibility in overall scale. Whilst this interpretation might be acceptable in terms of national policy, to safeguard the proposals it might be appropriate to ensure conditions in the event that development is allowed to prevent existing 'Town Centre' occupiers relocating to the site for a given period; or restricting the delivery of individual B1 Office premises to a maximum floorspace. This would be necessary to mitigate and avoid any future impacts on the town centre.
- 7.11. Given the large scale of the application proposals, considered specifically on the basis of the entire speculative scheme, it is unsurprising that the sequential test reveals no more suitable sites.

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/378203/employ-den.pdf

However, the conclusions at Paragraph 5.65 of the Planning Statement reflect that there remain significant questions over the sustainability credentials of the site:

“It has been clearly demonstrated in accordance with the NPPF that there are no sites that could accommodate the Proposed Development that are suitable and available within a reasonable period of time. Furthermore, it has been demonstrated that it would not be possible to disaggregate the Proposed Development into smaller constituent parts, whilst also providing Eco Park given the aspect of enabling development and the vision for Eco Park as a whole. The edge-of-centre application site, therefore represents the sequentially preferable location. The policy test has, therefore, been met in full.”

7.12. Once again, the location is viewed as ‘edge-of-centre’ despite the lack of any policy support for this assessment. This suggests a degree of subjectivity in the comparative assessment, for example over-stating the degree to which the application site is easily accessed by supporters (including by public transport) and the suitability for employment. In addition, there is no comparative viability assessment to demonstrate and justify the contribution different components make to deliver the overall Proposed Development.

7.13. The possible issues in relation to the sustainability of the location are significant in the context of the dismissed appeal (PINS Ref: APP/C1625/A/07/2054481) (see Appendix ‘EPC B’ to these representations) for the relocation of Stroud RFC to land at Eastington Park Farm, to the east of the application site. In this case, the Inspector noted that the applicants failed to identify any sequentially preferable sites, although stated that those within are adjacent existing urban areas should have received greater comparative weight. In any case, the Inspector considered the site on its own merits, in the event that similar conclusions were reached on alternative sites. At Paragraph 16, the Inspector’s Report noted:

“Eastington Park, while it is close to new industrial development on the edge of Stonehouse, is beyond the urban area and serves to separate the increasingly built-up areas of Stonehouse and Eastington. It therefore has a less clear-cut status as urban fringe land, and has a distinctly rural character.”

7.14. The “Eco-Park” application site is more isolated than the main urban area than the example above. The Inspector further went on to find that access by walking, cycling and public transport were not sufficient realistic alternatives to the private car. The potential community benefits of the location were reduced as a result of the lack of accessibility and over-reliance on other measures e.g. a community minibus.

7.15. It is accepted that the “Stadium Complex” aspect of these application proposals could deliver significant social benefits. However, these do not outweigh similar harms to those set out above in terms of the genuine sustainability of the location; particularly taking into the additional harms from strategic employment development in an unsupported location.

8. Concluding Remarks

- 8.1. These representations clearly set out the importance of the plan-led approach in terms of defining and providing for sustainable development in relation to Eastington Parish as well as in the wider context of considering the strategic priorities for sustainable development.
- 8.2. It is clearly uncontentious that the planning system should be genuinely plan-led (NPPF Paragraph 17) and that applications must be determined in accordance with the development plan as a matter of planning law (NPPF Paragraph 196).
- 8.3. The adopted Stroud District Local Plan 2006 – 2031 represents the culmination of significant plan-making efforts. The Plan has been Examined and found sound by the appointed Inspector and fully provides for objectively assessed needs for housing and employment. Residents in Eastington Parish have been actively engaged throughout the process, not least due to strategic allocation of development ‘West of Stonehouse’. The community is also seeking to further the contribution towards sustainable development in the Parish through the preparation of the Eastington Neighbourhood Plan, currently undergoing Examination.
- 8.4. This background provides a firm context for these representations to review and highlight the implications for sustainable development considered likely to arise from the speculative application proposals for ‘Eco-Park’ under 16/0043/OUT. No provision is made for the application site or these proposals within the adopted District Local Plan.
- 8.5. The application proposals provide an opportunity to review aspects of plan-making both within the immediate Parish as well as the wider strategic context. One must find, in accordance with the adopted District Local Plan and following Paragraph 14 of the NPPF that the application proposals are contrary to the development plan. Having done so, these elements also underpin in principle many of the other material considerations against which the proposals must be assessed and might otherwise indicate whether they are appropriate.

Strategic Aspects

- 8.6. In accordance with the NPPF, the adopted District Local Plan offers the best opportunity to secure net-gains across sustainable development across the District and specifically in the Parish of Eastington.
- 8.7. Important aspects explored in these representations provide an understanding of why the possibility of development at the application site has previously been rejected in favour of other alternatives. These representations highlight that there is no quantitative or qualitative need for the nature and scale of development proposed. The sequential test for the application proposals, considered on the basis of the cumulative scheme, nevertheless inevitably overlooks a number of potential impacts on town centre uses, for example in terms of demand for office space. The application material provides limited information on the nature of future occupiers or the contribution employment floorspace will make to enabling delivery of the “Sports Complex”

Local Aspects

- 8.8. The immediate impacts of the application proposals will be disproportionately focused on the Parish of Eastington, primarily based on the location of the application site. A number of factors must be looked at in detail in order to evaluate the implications for sustainable development locally. These include Impacts on (amongst others):
- Heritage including the Industrial Heritage Conservation Area;
 - Landscape;
 - Local Settlement Pattern;
 - Sustainability of the Location; and
 - Highways and Transport (see separate representations prepared for Eastington Parish Council)
- 8.9. The application material provides a relatively limited level of analysis or local understanding in relation to these issues. More detailed analysis highlights that there is a very strong relationship with the 'Guiding Principles' for the 'Stonehouse Cluster' in the adopted District Local Plan which direct against strategic development at the application site. The application site makes an important contribution to local character and identity while the proposals themselves are likely to detract from sustainable patterns of land use and travel movements based on the strategic scale of the scheme put forward.
- 8.10. Having undertaken a thorough assessment on behalf of Eastington Parish Council, it can be concluded that in addition to an objection in principle due to the nature of the proposals outside of the adopted Plan, none of these material consideration justify granting permission and the harmful impacts of doing so would significantly and demonstrably outweigh the benefits.

Appendixes

EPC A – 'Eastington Environmental Character Assessment' (January 2016)

EPC B – 'Decision Letter for Planning Appeal APP/C1625/A/07/2054481: Proposed Relocation of Stroud RFC to land at Eastington Park'