



The Rt Hon James Brokenshire MP  
Secretary of State for Planning  
Department for Housing, Communities and Local Government,  
2 Marsham Street  
London  
SW1P 4DF  
United Kingdom

15<sup>th</sup> October 2018

Dear Sir

Request for the SoS to call-in to remove determination powers from Stroud District Council (in Gloucestershire) in respect of application S.16/0043/OUT by Ecotricity. The site falls wholly within the rural parish of Eastington.

It is understood that if recommended for approval the scheme will be referred to SoS as a result of the overall internal area of 9,200m<sup>2</sup> but the Parish Council are keen to point out that the proposals meet the SoS's criteria for typically calling in proposals and respectfully propose that that option is carried out:

- The proposal is a major leisure facility in a rural, unsustainable location not directly connected to public transport.
- The site is outside of town and outside the nearest settlement boundary.
- There is conflict between the use of this site which could impact on the M5 J13 and the regeneration of other sites in the Stroud area.
- Site selection exercise not undertaken for a smaller proposal.
- Further, it being the case where football supporters are traditionally drawn from the locality a call-in would ensure that football allegiances locally do not have a predeterminatory impact on the final decision.

S.16/0043/OUT relates to: Land at M5 Junction 13 West of Stonehouse, Eastington, Gloucestershire. The development now comprises a 5,000 capacity football stadium and other ancillary uses (Use Class D2); two full-sized grass pitches and a goal practice area (Use Class D2); car parking for cars and coaches and highways improvements to the A419 including a signalised site junction and combined cycle/footway. All matters are reserved save for access.

To give this scheme some context the football stadium is intended to be used by Forest Green Rovers, whose home ground is currently located in the town of Nailsworth. The application has been amended and been subject to additional information during its consideration at Stroud District Council which has resulted in the football stadium being relocated during the application from one side of the A419 to the other and with the removal of business units, further indoor and

outdoor sports facilities, and Ecotricity offices from the original scheme. It is not clear from the application description which only cites a 5000 seat stadium but the accompanying information makes it clear that the stadium proposed is designed to be capable of increasing its capacity to 10000 seats without further engineering works.

Eastington Parish Council has sought its own professional planning and highway advice in respect of the amended scheme from Troy Planning and Design (dated February 2018) and Helix Planning (dated 27/2/2018) which were submitted on behalf of the Parish. These are now over six months old but as little has fundamentally changed in this time to the amended scheme they are still considered relevant and are attached for your attention. Whilst additional information in respect of transportation, ecology and noise have been submitted since the submissions they fail to address the more fundamental concerns raised by or for the Parish Council and it is feared that amended details are potentially going to be seen as weighing in favour of the application rather than being some modest mitigation for the schemes' harms.

The Secretary of State is requested to call in the application by Eastington Parish Council for the following reasons:

- **Outside settlement/contrary to policy in up-to-date plans**  
It is considered that the application would undermine the existing Stroud District Local Plan 2015 as the site is well outside the settlement boundary of Eastington and also outside and not well connected to an emerging housing site allocation because it is contrary to both the Stroud District Local Plan 2015 and the made Eastington Neighbourhood Development Plan October 2016. These plans are considered up to date. In the case of this application it is the principle of the application in that location which has been the Parish's concern, together with a lack of examination of other sites, particularly in regard to the smaller scale of the landmass now that the commercial units are withdrawn from the scheme and the lack of true community facilities/which in any case would be remote from and not required for nearby settlements. Other concerns around access/transport, ecology, noise impact and visual impact on the green corridor into Stroud are added to this in principle concern. The District Council is constantly seeking additional information but has not indicated their likely determination of this particular scheme and it now appears that, with officers adding the site to the Preferred Options of the future local plan, this site may not get the full and proper consideration it deserves.
- **Weight of emerging proposed Preferred Strategy**  
It is considered that undue weight may be placed on the emerging proposed Preferred Strategy for the next Local Plan until 2040. The content of what will be in the Preferred Strategy was being considered at Stroud District Councils Environment Committee on 11 October 2018. As such any proposal in this document still needs to be consulted on and it is understood that not all of the proposals will make it through to be Local Plan allocations. This is clearly at a very early stage in consultation and should not be given weight.
- **Conflict with M5 motorway, junction 13**  
The proposal in the Preferred Strategy for the next Local Plan until 2040 at the site of this application appears to advocate further development in the form of business uses, again

directly adjoining the M5 junction 13. This was included in the initial form of this application and had raised a holding objection from the Highways England as the traffic into Stroud regularly backs up right down the slip road on the south bound side in particular during peak times. That holding objection was withdrawn after the reduction of the scheme to its current state. It is clearly anticipated by the developer and Stroud District Council that at least part of the removed elements of the scheme will re-emerge in due course through the next local plan. With the two deaths at Taunton junction 25 last month in mind the Parish Council query further whether this site, being directly adjacent to junction 13 of the M5, remains the right the place for such a large stadium.

- **Site Selection**

It is considered that the use of the site for the proposed use will have a detrimental impact on the surroundings and that evidence has not been sought to demonstrate that a smaller site area in a more sustainable location could accommodate the stadium and two and a half training pitches, together with the hectares of parking spaces sought to accommodate travelling fans. Specifically it is now clear that land is being considered for development in the same Preferred Strategy for the next Local Plan until 2040 which could easily accommodate the scale of development sought directly adjacent to the M5 at Wisloe between junctions 13 and 14 and potentially within a few minutes' walk of Cam and Dursley Railway Station rather than a 47minute walk from the Stonehouse Railway Station. That site is also on a regular bus service serving Cam and Dursley train station, for sustainable access at non-game times.

- **Economic Growth/ stagnating regeneration**

Whilst not directly related to the Stadium in itself, if the Stadium were approved ignorance to policy considerations could have a long-term impact on economic growth within the Stroud Valleys: new development could be held back in an effort to seek to locate themselves as close to the M5 as possible. As well as stagnating regeneration in the wider Stroud area this would result in more people commuting via the M5 to their homes given the ease of access rather than finding more sustainable ways to travel to sports and business premises.

### Status of the Local Plan

The site is outside of settlement boundaries in the current Local plan of November 2015 and of the made Eastington NDP 2016.

Following the consultation on the Stroud District Local Plan Review Issues and Options Paper both north and south of the A419 are proposed for development. This was listed in the SDC Environment Committee pages of 13<sup>th</sup> September 2018 as being allocations in Stonehouse but they are not - they are wholly within Eastington Parish.

These are:

STO D M5Junction13 D1 EAS007 (south) 10Ha employment, canal and open space

STO D M5Junction13 D2 EAS007 (north) 18Ha sports stadium and community uses

It is understood that members of SDC Environment Committee failed to agree on part of the preferred Strategy for a further month as they were concerned about 1500 houses being proposed at Wisloe (Cam/Cambridge). Even if this Preferred Strategy is agreed by SDC Environment Committee when they meet again this month the agreement is only to put these sites to public consultation and in due course through a formal examination process. This means that the STO D sites as proposed will not become policy, if in fact this occurs at all until around the start of 2020.

#### Support for a call-in

Eastington Parish Council have considered seeking David Drew MP's support for a call-in but this would appear pointless given that he was previously Vice-Chair of Forest Green Rovers FC until returning to Parliament and it is understood remains a Member (unpaid) of the Advisory Board of Forest Green Rovers Football Club. (Parliamentary Register of interests 12 September 2017).

Eastington Parish Council has support for a call-in from the following people/bodies and note that the CPRE also objected formally to the proposal.

- Cllr Stephen Davies, District Councilor for Eastington
- Cllr John Jones, District Councilor for Eastington
- Nailsworth Town Council (home of the current football stadium)
- Arlingham Parish Council
- Whitminster Parish Council
- Frampton Parish Council

Further to the application being contrary to both the Stroud District Plan and the made NDP the application **conflicts with national policy**.

- NPPF July 2018 Section 9 (Transport) Paragraph 103.  
The planning system should actively manage patterns of growth in support of these objectives. **Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.** This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

Given its siting directly on the M5 Junction and some 47 minute walk from Stonehouse Station and 8-10m shuttle bus (assuming no traffic on a match day and therefore no queuing), local visitors from Bristol or Gloucester directions are more than likely to drive to the site. Given that the site at Wisloe allocation spoken about above is equidistant by car drivers from Nailsworth (site of the current club/fan base) and is closer to a railway station (Cam/Dursley) which happens to link Gloucester and Bristol to the Stadium this site needs to be fully considered.

- NPPF July 2018 Section 7 (Ensuring the vitality of town centres) Paragraphs 86.  
Local planning authorities should apply a **sequential test** to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an

up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

Given that the content of the development has reduced during the application (perhaps only in order to get the siting established) it is considered that the site search should be retested.

- NPPF July 2018 Section 15 (Conserving and enhancing the Natural Environment) Paragraph 170  
Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
  - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
  - d) **minimising impacts on** and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

In particular the site appears to show no respect for the existing field boundaries although it appears feasible to keep much of the long established hedgerows and a double hedgerow, which dissect the fields and line the A419 offering a soft green entrance into Stroud. Instead the scheme, even having considered ecology and acknowledged areas of particular interest, insists on planting new or translocated hedges which need not be touched and could be used to break up the site. Whilst the application is in Outline with siting to be agreed the submissions this far appear to be a detailed scheme unlikely to be changing in due course.

Further to the above the Secretary of State is respectfully requested to call-in the application for his own determination at the request of Eastington Parish Council

Yours sincerely

Parish Clerk, on behalf of Eastington Parish Council

cc:Planning Casework Unit by email to [pcu@communities.gsi.gov.uk](mailto:pcu@communities.gsi.gov.uk)

Encs.