

DH/MK/P19-0291

22nd January 2020

Planning Policy
Stroud District Council
Ebley Mill
Westward Road
Stroud
GL5 4UB

Dear Sir/Madam

**Stroud District Local Plan Review Consultation
Representations on behalf of Newland Homes**

Pegasus Group hereby submit representations to the Stroud District Local Plan Review Regulation 18 public consultation on behalf of Newland Homes. These representations relate mainly to the policies of the Draft Local Plan that would affect our client's site at Daniels Industrial Estate, Bath Road, Stroud ("The Site").

The Planning history of the site

The site was identified in the Stroud District Local Plan (2005) as an employment site, referred to as EK8- Daniels Industrial Estate, Bath Road. The site was subject to *Policy EM3*, which identified 37no. employment sites and areas to be protected from redevelopment for alternative uses (as set out in the Table 3 of the Local Plan). The policy stated that employment needs take precedence, and redevelopment for alternative uses or changes of use from employment use will not be permitted.

The site was later identified in the Stroud District Council Employment Land Study produced in February 2013 by AECOM, as a moderate quality industrial estate on a "steeply sloping hillside location." The site-specific assessment stated that the area had been "identified as a redevelopment opportunity, capable of providing some retail (foodstore) uses". The assessment also indicated that the "steeply sloping nature of the area may also make redevelopment difficult."

The assessment of the site contained in the report also concluded that "the site ought to be protected for employment uses, however, should the estate fall into long term vacancy/ dereliction, then it may provide an opportunity for refurbishment/ redevelopment to provide new employment and/or retail premises."

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This was carried forward into the Stroud District Local Plan Adopted 2015. The site was identified as ER7 Daniels Industrial Estate, Rodborough, under policy *EI2 Regenerating existing employment sites*. The policy aimed to regenerate sites that are identified in the Employment Land Study and provide jobs on site in improved premises.

Three planning applications for a provision of new ASDA foodstore, petrol filling station, vehicular access, parking and landscaping were submitted in 2013 (ref S.13/2284/FUL), 2014 (ref 14/1905/FUL) and 2015 (S15/1517/FUL). The proposed development was estimated to generate up to 250 workplaces across the facility.

The first and third application had been withdrawn by the applicant. The second application (ref S.14/1904/FUL) was refused on the grounds of a significant adverse impact on the viability and vitality of the town and local centres of Stroud, Nailsworth and Cainscross, and deliverability of the private retail investment on the Market Tavern site within the Stroud Town centre.

The site did not display any prospects for redevelopment to maintain the employment element in the years that followed. Large scale retail would not be acceptable given that planning permission had been granted on the Dudbridge Road site for a supermarket and in any event the market had moved on from large format stores.

On 12th February 2018, outline planning permission (ref S.16/2152/OUT) was granted for an alternative mixed-use redevelopment comprising new discount foodstore, food and drink retail unit, up to 50 residential dwellings, vehicular access and parking. It was estimated that the employment element of the proposal would be able to generate up to 96 full time workplaces.

The decision notice issued by the Stroud District Council from 12th February 2018 attached a number of conditions to the planning permission, limiting the lawful use of the site. Condition 10 stated that no more than 1,398sq m total net retail sales area shall be provided on site, whilst condition 9 restricted the main retail unit to a discount store and imposed strict limitations on what could be sold from the premises.

On other nearby sites Stroud District Council granted planning permission for the following schemes:-

- Bath Road Trading Estate- full planning permission (ref S.17/0557/FUL) for the reconfiguration and refurbishment of existing industrial units (L4A-L4D) to provide 2,193sqm modern Class B2 industrial floorspace, together with the demolition of vacant existing buildings and the erection of a Class A1 discount food store (1,918sqm gross), with associated access, car parking and landscaping.
- Dudbridge Industrial Estate, Dudbridge Road- application (ref S.17/1987/OUT) for a hybrid application for a full planning permission for a retail foodstore and flood mitigation measures and outline application for a residential development to the east and south.

Since then, Aldi have built out a store on the Bath Road site and Lidl are progressing with a unit on the Dudbridge Road site.

Given the fact that the foodstore on the Daniels Industrial Estate site was put forward on the speculative basis instead of being led by an end user, there is no realistic prospect of the site being built out when the two main discount operators have already secured sites nearby.

It can therefore be seen that the landowner has for a number of years sought to promote the site for uses which have included employment generating uses, but without success.

Employment Use

The planning history and assessments carried out over the years clearly indicate very limited prospects of regenerating the site for employment uses. It can be seen that the Local Authority acknowledged this fact when planning permission was granted for the mixed use scheme (which included 50 dwellings).

The planning permission (ref S.16/2152/OUT) allowed for a redevelopment of the site and the loss of employment land and buildings. As a result, 87,249 sqm of the gross internal floorspace was permitted to be lost. At the same time, the total gross new employment generating internal floorspace proposed as a result of the scheme was 2,170 sqm.

As identified in the Stroud District Employment Land Assessment 2019, the LPA was able to demonstrate a total surplus of 4.58ha of B Class Uses until the end of the Plan Period (2031). Table 1: Position as at 31st March 2019 indicates that there has been a total of 43.83ha of other uses developed between 2006-2019. There is no actual target to put it against however it indicates a healthy supply of 8.91ha of "other use class" commitments. Further to that, local plan does not allocate any further land for other use classes than B Use Class.

In that context it is also relevant to consider competing sites. The District benefits from a range of better suited sites, as set out in the policy *E11 Key Employment Sites* and these provide more attractive opportunities for those looking to locate in Stroud. These sites are proving more attractive to end users as they have better access and proximity to the main transport routes and are not constrained in the same way as the Daniels Estate site in terms of topography and outdated buildings and infrastructure. The location of the site and the availability of better alternative sites does not make redevelopment a viable option.

As set out in the above sections, the site has not been taken up by the market due to a speculative nature of the retail element and the take up of other new foodstore floorspace in the area (Aldi and Lidl). The evidence clearly indicates that despite numerous attempts to implement the permission, the consented employment element of the scheme is no longer viable and therefore undermines the prospect of bringing the site forward in the short, medium and longer term.

Accordingly, my client considers that the time has come to allow the site to be redeveloped for housing and without a policy requirement to provide employment generating uses as part of any redevelopment scheme.

Residential Use

Daniels Industrial Estate is situated along Bath Road, Rodborough, Stroud. The area is within main settlement of Stroud, which is considered to be a Tier 1 settlement. The area benefits from transport infrastructure that enables good access to key services and facilities, with good links to their suburbs and "satellite" communities.

The site is identified in the Brownfield Land Register under the ref: BR019. The site is privately-owned brownfield land that is categorised as capable of delivering a development. The brownfield register identifies the site has an established principle of the residential development as set out in the outline planning permission ref S.16/2152/OUT with an estimated capacity of 50 dwellings, as set out in the above planning application.

The suitability of the site for a residential use directly responds to the key priority issues of the Draft Local Plan. As set out on page 14 of the document, one of the overarching priorities of the plan is to maximise the potential of brownfield and underused sites to contribute to housing supply by allocating smaller brownfield sites within settlements for redevelopment and exploring other opportunities through the Brownfield Register as well as prioritising the use of brownfield, under used and infill land through the use of settlement boundaries.

The site already benefits from an outline permission for a residential development of 50 units, therefore, the principle of the residential development has been established across a large part of the site.

The principle of residential use in this general location is also supported by the newly proposed Local Plan Policy DHC1 Meeting Housing Need within defined settlements. The policy states that permission will be granted for residential development or redevelopment within the defined settlement development limits, subject to the satisfaction of detailed criteria defined for meeting housing need at settlements.

Employment Policies

Our client would therefore object to the policies set out in the Draft Local Plan which continue to require employment related uses as part of any redevelopment of the site. In particular our client objects to Local Plan Policy Delivery Policy EI2 which states that:-

**"Delivery Policy EI2
Regenerating existing employment sites**

Regeneration of existing employment land listed below will be permitted for mixed-use development, including employment-generating uses and

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housing, provided that there are demonstrable environmental and/or conservation benefits. Site rationalisation should provide at least the same employment opportunities for the local community as existed when the employment space was previously used, subject to viability and site-specific circumstances.

....
ER7 Rodborough Daniels Industrial Estate
....”

The policy identifies site ER7 Daniels Industrial Estate as one of the sites that is subject to the policy. On behalf of our Client we would suggest that any reference to the site is removed from the Policy.

As already explained previous attempts to bring the site forward for alternative uses, even as part of mixed-use schemes have all been unsuccessful and redevelopment for employment is simply not viable.

Residential Allocations

Our Client considers that the site should be allocated for housing.

Pre application discussions are already progressing with Officers and our initial layout work indicates that the site would have a capacity for around 120 residential dwellings, whilst retaining the office buildings in the north eastern corner of the site. This would enable the LPA to maximise the potential for housing on brownfield land in a sustainable location which is in need to regeneration.

Our Client anticipates submission of a planning application in July with first homes delivered on the site 2021- 2022.

Other Policies

Delivery Policy ES1 sustainable construction and design sets out the carbon emission requirements for all new developments across the District. Standards proposed under this policy clearly exceed the levels set out by the National Government in the Building Regulations. It is suggested that at this stage of the plan process, the Council's standards should align with Building Regulations.

The Council will have an opportunity to amend the Policy ES1 to reflect the Government proposals in the future consultations of the plan, once the work on the Future Homes Standard is finalised and the requirements are adopted. This will enable the Authority to closely align with the National Guidance and therefore ensure the proposed enhancements are universally applied and fully implementable across the future developments.

I would be most grateful if you could please confirm receipt of this letter and advise that the representations have been duly made.

I look forward to hearing from you with regard to these matters.

Yours faithfully

