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Planning Department  
Stroud District Council  
Ebley Mill  
Ebley Wharf  
Stroud  
GL5 4UB

3<sup>rd</sup> Floor  
Regent House  
65 Rodney Road  
Cheltenham  
GL50 1HX

01242 230066  
www.ridge.co.uk

Dear Sir/Madam

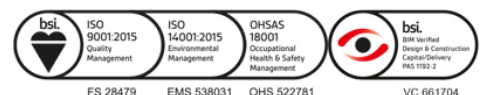
**REPRESENTATION TO STROUD DISTRICT LOCAL PLAN REVIEW: PRE-SUBMISSION DRAFT PLAN – PS20 M5 JUNCTION 13**

This representation has been prepared by Ridge and Partners on behalf of Ecotricity Group Ltd in relation to the consultation on the Stroud District Local Plan Review: Pre-Submission Draft Plan. Ecotricity Group Ltd is the promoter of Land at M5 Junction 13, which is proposed to be allocated within the Draft Plan at PS20. Previous representations have been made to the Local Plan Review and Ecotricity Group Ltd has been liaising with Stroud District Council regarding the proposed policy, through the preparation of a Vision Document and additional supporting information. This information has been uploaded onto the Council’s Website under ‘Promoter Material’ and it is understood that this will be shared with the Inspector by Stroud District Council.

The emerging Local Plan allocates the site under PS20 ‘M5 Junction 13’ for ‘a strategic mixed-use development, including employment, sports stadium, sports pitches, 70 bed care village, hotel, canal and open space uses. A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.’ The Policy goes on to highlight the criteria that the masterplan will need to address.

Ecotricity Group Ltd support the Pre-Submission Draft Plan and the allocation of the site for mixed use development. It is also considered that, as a whole, the Plan meets the tests of Soundness as set out at Paragraph 35 of the National Planning Policy Framework (NPPF). However, Ecotricity Group Ltd does hold concerns with the transport modelling that has been updated as part of the evidence base. The Local Plan’s primary objectives and core policies have been designed to address the climate change emergency and in doing so, the Local Plan has set itself a target of delivering carbon neutrality by 2030, twenty years in front of the national target set by the UK Government. Ecotricity Group Ltd firmly believe that if the climate change emergency is to be addressed and brought under control, the local plan objectives that support the reduction in carbon across Stroud need to be upheld and applied to all new developments within the District. The Local Plan identifies that our current transportation generates a significant proportion of the carbon output. In order to address this, it is considered that the transport modelling needs to be more optimistic in the amount of modal shift that can be achieved with all new strategic developments. As written, it would appear that the Local Plan is driving transformational change in the way we travel but the transport modelling does not seek to reflect this ambition. This issue is addressed below.

Minor amendments are also requested to the wording of Policy PS20 and its supporting text. These points are addressed below.



## Modal Shift

It is a clear aspiration of the Local Plan Review (Core Policy DCP1) for Stroud District Council to become Carbon Neutral by 2030, ahead of the Gloucestershire County Council and the UK Government target of Net Zero Carbon 2050. This is a theme throughout the Local Plan Review, and the specific policies throughout the Plan set aspirational criteria to assist with this agenda. A key element to this is the shift to sustainable modes of transport. Stroud Sustainable Transport Strategy (February 2021), which forms part of the Evidence Base for the Local Plan, looks to support a substantial modal shift away from cars. This is further supported by the recent publication of the emerging National Policy set out in Decarbonising Transport – A Better Greener Britain (14th July 2021).

Strategic Site Allocation Policy PS20 includes a number of criteria to ensure that sustainable transport enhancements are prioritised above the provision of additional highway capacity. This includes: the provision of high-quality walking and cycling routes on and off-site, a multi-modal travel interchange hub to allow for interchange for sustainable modes including bus, bicycle, walking, other forms of personal transport and car sharing, as well as contributions towards sustainable transport measures on the A38 and A419, local bus services, and the re-opening of Stonehouse Bristol Road rail station.

In this regard, Criteria 20 of Policy PS20 requires *'any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location.'* Page 24 of the Stroud Infrastructure Delivery Plan (June 2021) indicates that contributions will be sought to improve Junction 13. Ecotricity Group Ltd is already committed to improve this junction under the consented proposals for the Forest Green Rovers Stadium (S.19/1418/OUT).

In terms of the A419 Improvements, dualling of the A419 was suggested as part of the approved stadium application. However, this was prior to the focus in the Stroud Local Plan Review, and the Sustainable Transport Strategy (February 2021), which look to promote and support a substantial modal shift away from cars. Ecotricity Group Ltd do not support the provision of further highway capacity where it is not required as it will potentially stifle modal shift. Representations were made to the Gloucestershire Local Transport Plan LTP4 (2020-2041) consultation last year on this basis, highlighting support for sustainable modes of travel and a shift to EVs.

The Traffic Forecasting Report (March 2021) summarises the traffic modelling undertaken to support the Local Plan. It is not clear what highway layout on the A419 has been modelled past the Site, and it appears that the A419 is as per existing arrangement with a single carriageway widening to two lanes on the approach to the M5 Junction 13 and Chipmans Platt Roundabout. Under the modelled scenarios this layout works within capacity, with all Local Plan traffic added. As above, the Local Plan requirements for improvements to the A419 should reflect this and further highway capacity should not be provided where it is not required, as it could stifle modal shift and conflict with the overall aspirations of the Plan.

The traffic modelling applies a 15% Modal Shift. In our view, the modal shift assumptions in the traffic modelling reflect current achievable Travel Plans modal shifts but could be considered a low modal shift against the aspirations of the Stroud Sustainable Transport Strategy within the Local Plan Review. As a result, there may be further modal shift (over 15%) which should mean that less highway capacity is needed, or longer-term, road space could be reallocated to sustainable travel modes, such as personal transport routes that can accommodate cycling, walking, electric bikes and electric scooters. At this stage, as the strategy is untested, it is unclear if this would be the case. However, it is our clients view that measures to promote sustainable transport and modal shift should be sought in the first instance, as opposed to potentially unnecessary highway improvements to the A419 which could undermine the Stroud Sustainable Transport Strategy. If highway improvements are found to necessary, it is

considered that all allocations benefiting from the increased capacity should be expected to contribute towards the improvements. It is noted that there is allowance for this in respect of Site Allocation PS19a.

### **Proposed Amendments to the Policy**

As above, Ecotricity Group Ltd request amendments to policy wording as set out in PS20. A summary of the proposed amendments, and explanation, is set out below. For completeness, an amended full policy has also been provided below.

#### ***Introductory Paragraph***

The introductory paragraph to Policy PS20 highlights that:

*Land north east and south east of M5 Junction 13, as identified on the policies map, is allocated for a strategic mixed use development, including employment, sports stadium, sports pitches, 70 bed care village, hotel, canal and open space uses.*

The wording highlights that the proposal includes a '70 bed care village'. It is requested that the reference to 70 beds is removed to allow a flexibility both in the policy and the design of the development.

The policy goes on to state that 'a development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.' Initial work undertaken suggests that this will be in the form of a Care Village incorporating a 70 bed Care Home rather than a 70 bed Care Village. Once again, flexibility is sought in the wording of the Policy to allow for the need, size and scale of this element of the development to be established through the masterplanning exercise. In this regard, there are provisions in place for appropriate masterplanning as part of the policy which ensures that the Council has control over the future development aspirations of this element of the proposal. As such, it is requested that the wording is updated, as follows:

*Land north east and south east of M5 Junction 13, as identified on the policies map, is allocated for a strategic mixed use development, including employment, sports stadium, sports pitches, care village, hotel, canal and open space uses.*

#### ***Criteria 1 and 3***

Criterion 1 highlights the following:

*'sports stadium, to be located north of the A419, and ancillary uses including fitness centre, hotel and sports training pitches located within a landscaped setting'*

Criterion 3 highlights the following:

*'Care village to be located adjacent to Westend/Great Oldbury'*

Detailed studies of the site are currently being undertaken as well as more detailed masterplanning of the site. This work will look at the most appropriate locations for the proposed land uses and therefore it is requested that flexibility is drawn into the policy to allow successful masterplanning of the site. As highlighted above, the policy requires a

development brief to be approved which incorporates ‘an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.’ As such the proposed location of the land uses still needs to be agreed with the Council as part of this process. It is therefore considered that the wording as drafted is too prescriptive and has the danger of being outdated as the masterplan progresses.

As such, it is requested that the wording of criterion 1 is updated, and the wording of criterion 2 updated to make reference to care village, as follows:

- 1. sports stadium and ancillary uses including fitness centre, hotel and sports training pitches*
- 2. Approximately 10 hectares of business uses associated with the green technology and low carbon sector (including office, B2, B8 and ancillary uses) and care village located outside of the Industrial Heritage Conservation Area (IHCA) and designed so as to minimise any potential harm and impact upon the IHCA;*

These changes will allow future consideration of design issues during the lifetime of the plan. Criterion 3 is no longer necessary given the references to the Care Village in criterion 2.

Similarly, Paragraph 3.2.21 of the supporting text specifies the proposed locations. Whilst it is noted that specifications can be made in respect of the Industrial Heritage Conservation Area (IHCA), it is requested that the remainder of this Paragraph remains flexible. Suggested wording is as follows:

*3.2.21 The sports stadium, employment, hotel, care village, and other ancillary built development will be located outside of the Industrial Heritage Conservation Area (IHCA). The canal cut, open space uses, grass training pitches and minimal ancillary built development will be provided within the IHCA and designed to have minimal harm and impact on the IHCA.*

**Criteria 20**

Criteria 20, as above, requires ‘any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location.’ In terms of transport, we would raise an objection in relation to this criterion on the basis that it is too open ended and may require a contribution for highway works that are not required or in any way related to the allocation. This would encourage unsustainable travel behaviour against the wider aims of the council to be carbon neutral by 2030. Any necessary infrastructure improvements can be secured, as is standard practice, as part of S106 Agreements alongside any future planning application. As such, it is suggested that this criterion is removed completely.

**Proposed Revised Wording**

The above changes are proposed to the wording of the policy. For completeness, the whole policy is included below. Additional/amended text is shown underlined and the wording to be deleted has been crossed out.

**Strategic Site Allocation Policy PS20  
Stonehouse - Eco Park M5 Junction 13**

*Land north east and south east of M5 Junction 13, as identified on the policies map, is allocated for a strategic mixed use development, including employment, sports stadium, sports pitches, ~~70-bed~~ care village, hotel, canal and open space uses.*

*A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.*

*This will address the following:*

- 1. Sports stadium , ~~to be located north of the A419, and ancillary uses including fitness centre, hotel and sports training pitches located within a landscaped setting;~~*
- 2. Approximately 10 hectares of business uses associated with the green technology and low carbon sector (including office, B2, B8 and ancillary uses) and care village, located outside of the Industrial Heritage Conservation Area (IHCA) and designed so as to minimise any potential harm and impact upon the IHCA;*
- ~~3. Care village to be located adjacent to Westend/Great Oldbury;~~*
- 4. Canal cut, towpath and operational uses as part of the restoration of the Stroudwater Canal to navigable uses from Saul Junction to Stroud and beyond;*
- 5. Accessible natural green space providing a net gain to local biodiversity and linking with existing green infrastructure;*
- 6. Structural landscaping buffer along the M5, A419 and adjacent to residential properties at Westend and Chipman's Platt, incorporating existing and new native hedgerows and trees;*
- 7. The acceptable management and disposal of surface water, including sustainable drainage systems (SuDS)*
- 8. Adequate and timely infrastructure to tackle wastewater generated by the development, in agreement with the relevant water company;*
- 9. A layout of uses, density and built form and character which ensures less than substantial harm to IHCA;*
- 10. High quality, safe and secure walking and cycling routes to integrate all sections of the site and to connect with NCR45 and contributions towards the enhancement of off-site walking and cycling routes to key destinations including Stonehouse town centre, Stonehouse railway station and routes to Stroud;*
- 11. Contributions and support to sustainable transport measures on the A38 and A419 sustainable transport corridors;*
- 12. Multi-modal travel interchange hub to serve the development at a central accessible location north of the A419 to allow for interchange for sustainable modes including bus, bicycle, walking, other forms of personal transport and car sharing;*
- 13. Public transport permeability through the site to facilitate existing diverted and new bus services and contributions to enhance bus service frequencies to key destinations including Stroud, Stonehouse and Gloucester;*
- 14. A dedicated shuttle bus service between the site and Stonehouse and Cam and Dursley rail stations;*
- 15. Contributions towards the re-opening of Stonehouse Bristol Road rail station;*
- 16. Electric vehicle charging points in accordance with local parking standards;*
- 17. Actively managed car parking provision to provide a level of constraint to unnecessary car usage;*
- 18. Behavioural change measures to encourage sustainable travel by way of new and improved infrastructure and implementation of a Travel Plan;*
- 19. Primary vehicular access from the A419 and additional vehicular access from Grove Lane, with necessary improvements to the existing highway network;*
- ~~20. Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location;~~*

*The delivery of the canal cut, towpath and operational uses as part of the restoration of the Stroudwater Canal to navigable uses will be a requirement of the development on land south of the A419, as it will provide essential mitigation to minimise any harm to the IHCA."*

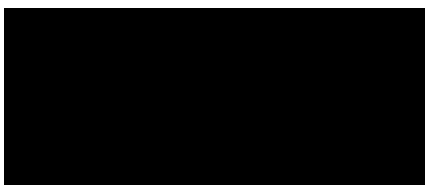
## Summary and Conclusion

Overall, Ecotricity Group Ltd support the Pre-Submission Draft Plan and the allocation of the site for mixed use development. It is also considered that, as a whole, the Plan meets the tests of Soundness as set out at Paragraph 35 of the National Planning Policy Framework (NPPF). However, there are some concerns with the transport modelling that has been provided to inform the evidence base, and it not being fully aligned with the aspirations of the Local Plan Review in terms of modal shift, as well as the Stroud Sustainable Transport Strategy. The traffic modelling applies a 15% Modal Shift, which is considered a low modal shift against the aspirations the Plan and Sustainable Transport Strategy. Irrespective of this, the Local Plan requirements for improvements to the A419 should reflect the work undertaken and further highway capacity should not be provided where it is not required, as it could stifle modal shift and conflict with the overall aspirations of the Plan. It is considered that proportional infrastructure funding provided by the Site would be better spent on sustainable modes of transport and encouraging modal shift, as opposed to unnecessary improvements to the A419 which could undermine the Stroud Sustainable Transport Strategy.

Furthermore, there are some minor amendments proposed to Policy PS20 and its supporting text, as set out above.

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

Yours faithfully,



**For Ridge and Partners LLP**