

Date: 4th November 2017
Your Ref: 17.9000/AM/MG

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Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
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Dear Sir/Madam,

Stroud Local Plan Review – Issues and Options Public Consultation Formal Representations of behalf of William Morris College

We are pleased to submit on behalf of our client, William Morris College (WMC), representations to the Stroud Local Plan Review Issues and Options Public Consultation. WMC is a specialist college located to the south-west of the A419 at Chipmans Plat, immediately to the south-east of areas 'STO D1' and 'STO D2', which are identified within the Issues and Options paper as potential, broad locations for future growth within 'The Stonehouse Cluster.'

WMC is a registered charity and specialises in working with young people with communication and learning difficulties ranging from moderate to severe, as well as profound and multiple needs, who frequently rely on the unique services and assistance provided by the college for their day-to-day needs and in learning to live independently and to cope with the severe difficulties and stigma that people with emotional and learning difficulties frequently experience in adult life.

The college provides a nurturing and dedicated community where young adults with learning difficulties can find a meaningful education and a fulfilling social life, with services designed to meet the evolving needs of its students in a fast-changing world. It is set in several acres of gardens which provides training opportunities for students in estate management, gardening and horticulture. The students assist in maintaining the college grounds as well as contributing to the development of projects, such as the creation of the peace garden.

Background

An outline planning application for an 'Eco Park' comprising a 5,000-seater stadium, 6.4ha of employment land and other uses (Ref: S.16/0043/OUT) was submitted by Ecotricity on land to the north-west of William Morris College. Representations were previously made on 29th September 2017 to the extant outline planning application, which can still be viewed via the Council's online Planning Register.

We would note that, as recently publicised in the local media, the applicant intends to submit alternative proposals before the end of the year, which would involve a revised layout that would also exclude the employment element of the proposals. However, it is not clear whether this would be considered as a



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revision to the current application or whether a new application would be submitted, as the applicant has still not formerly given notice to the Council of its intention to withdraw the application.

The site has been subsequently identified by the Stroud Strategic Assessment of Land Availability (SALA) (August 2017) as potential, broad locations for future growth within 'The Stonehouse Cluster.' These locations are identified within the Issues and Options Paper as areas 'STO D1' and 'STO D2'. In this regard, the Consultation Paper suggests that the area has good access to services and facilities elsewhere, while it also accommodates the second largest number of jobs in the District, after Stroud. In terms of landscape sensitivity, the paper adds that the preferred direction for new housing and employment growth would be to the west or to the north of the existing settlement.

Accordingly, our client would *strongly object* to the identification of the areas STO D1 and D due to ongoing concerns regarding the direct impacts of the development on the safe and effective, ongoing operation of the College and its residents. These risks were confirmed following the receipt of expert evidence provided within the following, technical documents, which were submitted in response to the extant planning application and can still be viewed via the Council's online Planning Register (please note that these reports can also be provided upon request):

- Noise Impact Report;
- Lighting Impact Report; and
- Medical Impact Analysis Report.

WMC's consistent and continued opposition to development at this location therefore demonstrates the importance of this issue and the significance that the implications of any inappropriate development would have on the health and wellbeing of the college's students and residents. These representations therefore focus on the following planning considerations, which are considered crucial to the suitability of the site for future development:

- Landscape and Heritage Impacts;
- Need for Employment;
- Potential Impacts on William Morris College; and
- Requirement for Mitigation.

Landscape and Heritage Impacts

Areas STO D1 and D2 are located within the 'Stonehouse Cluster', which is addressed within Chapter 3 (Making Places – Shaping the future of Stroud District) of the current iteration of the Stroud District Local Plan. Accordingly, the 'Vision' for the parishes around Stonehouse states that "*growth and development will be minimal outside of the 'strategic location' identified west of Stonehouse...*"

Additionally, the Guiding Principles for the Stonehouse Cluster includes the importance of the A419 corridor as a 'gateway' to Stonehouse and the Stroud Valleys, where "*urbanisation of character and linear sprawl*" should be avoided. Particular emphasis is also given to conserving and enhancing the area's heritage assets through distinctive design in keeping with local identity and character, which specifically includes the significance of the Industrial Heritage Conservation Area (IHCA).

It is considered that the scale of development that could take place at areas STO D1 and D2, which would represent an excessive intrusion into the open countryside and would eliminate the natural 'gap' between the motorway, Westend and Chipman's Platt, resulting in an uninterrupted corridor of

development from the motorway to the Stroud Valleys, more than 10km to the south-east. This is demonstrably contrary to Guiding Principle Nos. 8 and 9 of the current Local Plan Vision for the Stonehouse Cluster.

Need for Employment Land

Adopted Policy CP2 of the current iteration of the Stroud Local Plan states that at least 58ha of additional employment land (Class B1) uses for the period 2006-2031. This figure of anticipated need was based on historic take-up of employment land set out within the Stroud Employment Assessment Review prepared by BE Group in November 2014.

Annual completion data provided within the Stroud District Employment Land Availability (ELA) assessment illustrates that, as of April 2017, the Local Plan target of 58ha over the *entire plan period* had already been exceeded with a surplus provision of 6.66ha of employment land, even after taking into account losses to other uses (ca. 25.85ha).

Consequently, and subject to any future evidence, there is demonstrably no need for additional employment land at Stonehouse of the scale suggested by the Issues and Options paper neither at the present, nor is there likely to be within the next Local Plan Review period. Moreover, the Issues and Options paper notes that Stonehouse already has the second greatest number of jobs within the District after Stroud. It is therefore likely that significant, existing congestion problems caused by inward commuting, particularly from outside the District, will be exacerbated by such a large scale development.

Potential Impacts on William Morris College

A number of technical reports were prepared by expert consultants and were submitted as part of our client's previous objection to the extant planning application. These reports examined the potential impacts of the proposed development on the continued operation of the college, given the sensitive nature of the medical conditions of its students and residents.

Accordingly, these reports comprised the following documentation, which can still be viewed as part of the extant planning application via the Council's online Planning Register and which can be provided directly, upon request:

- Medical Impact Analysis Report;
- Lighting Report; and
- Noise Report.

Concerning the ongoing operation of WMC, the potential effects of the proposed development in terms of noise and lighting are likely to have serious implications for the wellbeing and existing health conditions of the students and residents of the college, which are likely to be exacerbated by the development.

This includes the potential for inducing emotional and psychological triggers that can cause sufferers of mental health disorders to relive traumatic experiences and further endure anxious, depressive or violent episodes. This has been confirmed by expert, medical advice provided by a Chartered Clinical Psychologist.

This would be severely detrimental to the livelihood of highly vulnerable people, who frequently rely on the unique services and assistance provided by the college for their day-to-day needs and in learning to live independently and to cope with the severe difficulties and stigma that people with emotional and learning difficulties often experience in adult life.

There is therefore a significant risk that the proposed development will be the direct cause of additional trauma and hardship for young people already suffering from complex educational, communicational and psychological issues that are too frequently misunderstood and dismissed by wider society. Consequently, our client reiterates its strong objection to the proposed development and it is considered that the application should be categorically refused.

Requirement for Mitigation

Notwithstanding the matters discussed above, which our client continues to advocate, if the land were to be identified for any future development, it is considered essential that account is taken of the ongoing needs and operation of the college as part of any development proposals.

In this regard, given the high sensitivity of residents and activities at the college to sudden, unexpected stimuli, such as loud noise and flashing lights, it is considered that a specific policy requirement for proposals to examine and mitigate against potentially significant, adverse impacts on the college should be incorporated into the Local Plan Review.

This would include a site-specific requirement for the provision of a ca. 200-300m buffer to be included between William Morris College as part of any future proposals at this location, which would be excluded from any development. In this regard, it is felt that the existing hedgerows along the north-western curtilages of the adjacent fields would function as a logical and natural axis for this development limit. Given the importance and particularly sensitive nature of the college as a noise and visual receptor, in addition to the magnitude and frequency of noise and lighting impacts, this is separation distance is considered to be reasonable.

This would, in any case, also help retain a degree of the open nature of the land and maintain the distinct identity of Chipmans Platt, upon which the impacts of the currently proposed development have already been raised as significant concerns.

Additionally, any planning application for development at the site should be required to specifically assess the potential impacts on William Morris College either via a standalone Noise Report or via an Environmental Impact Assessment, as appropriate, in order to determine the requirement for any additional mitigation measures. Even with the provision of an appropriate buffer, it is considered that measures, such as suitable acoustic fencing, new tree planting, bunds or a combination of these will likely be necessary due to the college's existing, operational requirements.

Summary and Conclusion

The current and ongoing operation of WMC is highly dependent on the college's isolated context and natural surroundings, which are of considerable benefit to its students and residents suffering from life-affecting traumas and medical conditions. Technical advice has also been received, including formal, medical advice, which confirms the harmful and irreversible, potential impacts that would likely result from inappropriate development at this location.

It is therefore considered that, based on medical evidence informed by technical surveys and reports, there should be no development at the site, particularly of the scale proposed by the extant planning application or envisaged by the Stroud Local Plan Review Issues and Options paper. This is based on the following, key issues:

- Development at this location would represent an excessive encroachment into open countryside and would cause the significant urbanisation of the local character via linear sprawl;
- The visual quality and significance of the IHCA and the wider landscape would be significantly eroded;
- There is no evidenced need for the identification of the land for strategic levels of development, as the initial Stroud Local Plan requirement has already been exceeded;
- The importance of the existing, natural 'gateway' along the A419 corridor to Stonehouse and the Stroud Valleys is highlighted within the Local Plan Vision"; and
- Existing congestion issues would be exacerbated as a result of increased, inward commuting, particularly from outside the District.

Notwithstanding the above, if the land were to be identified for development, we would insist that account is taken of the ongoing needs and operation of William Morris College as part of any development proposals, which would identify necessary mitigation measures. It is considered that such mitigation measures should be explicitly required by Local Plan Review policy and are considered likely to include the following:

- An undeveloped buffer of ca. 200-300m delineated along the north-western curtilages of the adjacent fields between the college and any development is considered essential;
- The provision of suitable, acoustic fencing;
- New tree planting and landscaping; and
- Implementation of bunds, where appropriate.

I trust that the above is of assistance. If you have any further questions or queries, please do not hesitate to contact me.

Yours sincerely,

[Redacted signature]

[Redacted name]

[Redacted contact information]