

Date: 18 July 2021

Our ref: Your ref:

Stroud District Council, **Ebley Mill Ebley Wharf** Stroud GL5 4UB



Dear Sir or Madam,

## Representation for the Stroud District Local Plan Review (Pre-Submission Draft Plan-Regulation 19): Parcel D at Westend Farm, Stonehouse

This representation to the SDC Draft Local Plan (Regulation 19) has been prepared by Bruton Knowles in support of the above site.

This representation should supersede any previous representations made on this land. Comments received in the latest SALA (under reference EAS014 - Land north of Westend Farm) have been acknowledged and the previous land submitted, which measured 24 hectares, has now been divided up into two smaller parcels to reflect concerns of the proposals likely detrimental impact upon the setting of Westend and the erosion of countryside between Stonehouse and the M5.

Parcel D now measures circa 5.4 hectares and its revised redline boundary is set out in the supporting location plan.

My client would now like for officers to consider a wider range of uses on the parcel, which may also be appropriate in addition to employment. This includes uses such as: elderly accommodation and both care home and health care facilities.

As stated in previously submitted representations, parcel D has limited physical constraints and is not contained within a sensitive landscape designation. The parcel is still available and suitable over the next five years.

The SDC Draft Plan sets out that the future of expansion of Stonehouse is being directed west along the A419 towards junction 13 of the M5 motorway, where employment uses are directed and to the north west, where both a mix of residential and employment uses are proposed.

The parcel is located circa 115 metres from proposed strategic allocation PS20, which will provide; 10 hectares of employment land and a sport stadium. A planning application (S.19/1418/OUT) for the development of a 5,000-capacity football stadium on land to the north of the A419 is currently pending a decision. The closest point of parcel A to the proposed football stadium is circa 220 metres.









These new uses and infrastructure proposed above will completely change the landscape character of Westend, and its connectivity to junction 13 of the M5.

Furthermore, the parcel is also located circa 560 metres from strategic allocation SA2 (as set out in the current Local Plan). This allocation corresponds to planning application no. S.14/0810/OUT, which was approved for a mixed-use development comprising of up to 1,350 dwellings; 9.3 hectares of employment land; a mixed-use local centre and a primary school.

In assessing the need for employment land, it is important to consider the latest SDC Employment Land Availability Study (April 2019), which sets out that if employment figures include the predicted level of loss for employment, SDC will need to find an additional 12.08 hectares of land by 2031.

Given that parcel D and parcels A, B, C and E (to be submitted separately) are all located in close proximity to proposed and adopted allocations PS20 and SA2, it should be considered that further employment uses on these parcels will be appropriate to future surrounding uses.

In assessing the need for extra care homes, the latest Gloucestershire Local Housing Needs Assessment (October 2019) sets out that "Over the 20-year period 2021-41, there is a need for an additional 13,110 homes, including around 14,566 sheltered homes (11,676 owner occupied and 2,890 for rent) and around 898 extra care homes (670 owner occupied and 228 for rent)". If officers prefer, my clients parcels of land at Westend (apart from parcel C), can accommodate a proportion of this requirement for such facilities.

It is noted that the parcel is in close proximity to the M5 motorway and it should be considered that a satisfactory buffer to this can be retained to mitigate any issues.

or parcel D sets out any potential constraints to the parcel:

The nearest heritage asset is Westend Farmhouse (1153109) that is Grade II listed and located circa 175 metres from the parcel's boundary. There is an appropriate buffer in place which means resulting impacts to the asset's setting will be minimal.

#### Landscape

The site is not set within any sensitive landscape designations apart from being located in the open countryside.

# **Ecology**

The majority of the site is in agricultural use with limited if any ecological benefit. The ecological benefit of the site is likely to relate solely to the boundary features of the site which will be retained and improved upon by new tree planting in any future development.

#### Access

Access to the site will be gained via Grove Lane, which has good visibility in both directions.

There are existing bus stops located on Grove Lane (a short distance from the site) that provide direct services to both Arlingham and Stroud.

#### Drainage

Environment Agency Flood Risk mapping for land-use planning, indicates that the site is located in a Flood Risk Zone 1. This indicates that the overall site has a low probability of flooding (less than 1 in 1,000 annual probability of river flooding) and can be developed. This is a significant be nefit of our client's site, as much land to the south of the A419 is located in flood zone 3 which severely constrains Stonehouse's future expansion.

### **Summary**

In considering the above, there would appear to be no overriding physical constraints or potential impacts preventing sensitively located development for a mixed-use scheme, which can provide a buffer to the M5 motorway.

Bruton Knowles would like to express that the site is under single ownership and that it is immediately available and deliverable over the next 5 years. Given that parcel D at Westend is smaller than the previous area of land submitted in last years Preferred Options Consultation, it should be considered that policy officers concerns have been adhered to and as a result it would make an appropriate allocation.

Should you have any queries please let me know.

Yours sincerely



**David Smart** BSc (Hons) Msc MRTPI Planner