

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

Dear Sir/Madam,

**Stroud Local Plan Review – Emerging Strategy Consultation
Formal Representations of behalf of William Morris College
Potential Development Sites PS20a and PS20b**

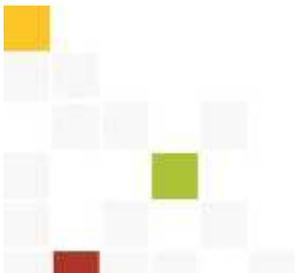
We are pleased to submit on behalf of our client, William Morris College (WMC), representations to the Stroud Local Plan Review (SLPR) Emerging Strategy consultation. WMC is a specialist college located to the south-west of the A419 at Chipmans Platt, immediately to the south-east of areas 'PS20a' and 'PS20b', which are identified within the Consultation Paper as potential locations for future growth in the SLPR. It is these two sites that are the subject of these representations.

William Morris College

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.

WMC is therefore a very special environment but the nature of its care also means that its residents are extremely sensitive to change. We therefore ask that this be acknowledged by the District Council and that the emerging Local Plan protects the amenity of both the College campus and its residents.



Background

Outline Planning Application (Ref: S.16/0043/OUT)

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 application, which can still be viewed via the Council's online Planning Register. Subsequently, the applicant has submitted revised proposals that include a revised layout with the proposed stadium now located to the north of the A419 and excluding the employment element of the proposals. However, the application site boundary still includes the land south of the A419, which remains a significant cause for concern for WMC.

SLPR Issues and Options Consultation (Refs: 'STO D1' and 'STO D2')

The Ecotricity application site was previously identified within the Issues and Options Paper as areas 'STO D1' and 'STO D2'. In this regard, the Consultation Paper suggested 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.

Consequently, representations were submitted on behalf of WMC setting out our significant concerns regarding the direct impacts on the safe and effective, ongoing operation of the College and its residents, were the areas to be identified for development within the ongoing SLPR. These risks were confirmed following the receipt of expert evidence provided within technical documents, including the likely, significant impacts upon the health and wellbeing of the residents of WMC due to the likely noise impacts, 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).

SLPR Emerging Strategy – Representations

The land subject to the extant planning application is identified within the SLPR Emerging Strategy as two potential sites for development to the north and south of the A419 (Refs: PS20a and PS20b, respectively). However, it is noted that the Consultation Document incorrectly identifies the land to the north of the A419 (PS20a) as proposed for 10ha of employment land, a canal and open space, while the land south of the A419 (PS20b) is identified as land for an 18ha sports stadium and community uses.

Notwithstanding our view regarding the unsuitability of the site for development and without prejudice to our ability to comment further of the extant planning application, this is clearly incorrect and *must* be clarified and rectified at the earliest opportunity to reflect the location of the proposed stadium to the north of the A419.

Need for Additional 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.

The Council's latest Strategic Assessment of Land Availability (SALA) New Sites Update Report (October 2018) provides the latest evidence base in terms of housing and economic development within the district. However, the report explicitly states that "*the quantum of employment land needs beyond 2031 has yet to be identified*" (Para. 2.12). In any case, Table 2 of the SALA illustrates that the sufficient land for the requirements during the period 2006-2031 has *already* been identified and in fact, exceeded by 18.13ha. Even if 'potential' losses from current planning applications are taken into account (8.9ha), there would still be a surplus of 9.23ha.

Without further information on the likely requirements between 2031 and 2036, it is therefore premature to begin identifying potential employment sites at this early stage of the SLPR as there is no evidence regarding the quantum of land required to be identified, particularly when there is already a surplus of land that would exceed the requirements up to 2031. Additionally, the previous SLPR Issues and Options Consultation Report (February 2018) found that 53% of respondents to questions on the Stroud Local Economy felt there was no need for additional employment land allocations (Para. 3.10).

Landscape and Heritage Impacts

According to the currently adopted LDP, 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. It is considered that the scale of development that could take place at areas PS20a and PS20b, 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.

*Particular emphasis is also given within the currently adopted LDP 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). In this regard, the accompanying Sustainability Appraisal (SA) (November 2018), identifies the PS20 (including parts 'a' and 'b') site as "having **significant or very significant** heritage constraints... These sites are noted to have the greatest potential to have **significantly adverse impacts** in terms of the setting of identified heritage assets..." (Para. 6.123)*

These findings reflect the conclusions of the 2017 SALA, which clearly states that, "*there is scope for development to the north of the A419 [in terms of heritage impact], but the likely impacts could preclude development on the **majority or the entirety** of the land south of the A419.*" Additionally, although the reinstatement of the historic canal may have some heritage benefits, these "*may not outweigh the harm caused to the conservation area's character and the setting and significance of Meadow Mill.*" The SALA concluded that, while the restoration of the canal with open space uses

would be appropriate within the conservation area, “...buffers would need to be provided with the M5, the A419 and sensitive buildings in Westend and Chipmans Platt... including William Morris House [WMC].”

Accordingly, it is considered entirely inappropriate to propose such a drastic revision to the Local Plan Vision and Spatial Strategy that conflicts with the Council's own technical, sustainability findings and without sufficient justification for need for additional growth.

Potential Impacts on William Morris College

A number of technical reports were prepared by expert consultants and were submitted as part WMC'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 development at sites PS20a and PS20b 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 SLPR.

This would include a site-specific requirement for the provision of a landscaped buffer to be included between WMC 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. 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 development at the site should be required to specifically assess the potential impacts on WMC 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 Changes Sought

The current and ongoing operation of WMC and the wellbeing of its residents is highly dependent on the college's peaceful context and natural surroundings, which are of fundamental benefit to its students who may be 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 adjoining the site, particularly of the potential scale identified in the SLPR Emerging Strategy Consultation Document, that may have a detrimental impact on the amenity of the College.

We respectfully ask that there is a specific and categorical reference within the SLPR to the fact that the College represents a special and highly-valued facility, the protection of which should be given significant weight and consideration. Therefore, notwithstanding the identification that sites PS20a and PS20b have been incorrectly labelled, as an absolute minimum the SLPR must make a clear statement that no development will be allowed on either area unless it has been clearly demonstrated that there will be no adverse impact on the amenity of the College or its residents.

Notwithstanding this, it is also considered that potential development sites PS20a and PS20b would be inappropriate for development for the following reasons:

- 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 evidence for the identification of additional employment land, 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 currently adopted Local Plan Vision.

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,

