

STROUD DISTRICT LOCAL PLAN REVIEW INSPECTORS MATTERS, ISSUES AND QUESTIONS

Matter 6 Statement
Ecotricity Group Ltd

Matter 6b Stroud Valley

Local Sites Allocation Policy PS06 The New Lawn, Nailsworth

The site is allocated for approximately 90 dwellings and associated community and open space uses and enabling infrastructure.

a) The site's delivery is subject to the relocation of Forest Green football club and the retention or relocation of associated community uses. What progress has been made on this?

6.1 A relocation site for Forest Green Rovers Football Club (FGRFC) has been secured (and is wholly owned by the Club's owner). This has planning permission for the stadium and associated facilities, and also is allocated under PS20 within the SDLPR, the location and content of which has been through extensive consultation.

6.2 The SOCG for PS20 sets out the full planning history but key applications are:

- Outline planning permission (S.19/1418/OUT) was granted for a 5000-capacity football stadium, 2 additional pitches and a goal practice area, as well as access, parking and highways improvements to the A419. Zaha Hadid Architects and a full consultant team has been instructed and are currently preparing the Reserved Matters for submission this Summer, which includes detailed design of the Stadium.
- An Outline Planning Application was submitted in January 2022 (S.22/0206/OUT) for the Eco-Park development comprising 'a 5,000 capacity football stadium, indoor and outdoor playing pitches, an Academy building, up to 37,700 sq.metres of Class E offices and 18,000 sq. metres of B2/B8 employment floorspace with up to 2,750 sq. metres of ancillary Class E food/retail/creche, a hotel with up to 100 beds, a Care Village including a 70 bed Care Home, as well as associated access, parking, landscaping and other ancillary works'. This is pending consideration.
- Planning permission was granted in May 2021 for the provision of 2 training pitches (S.20/1256/FUL) south of A419 and site east of the M5. A revised application for these pitches was permitted in April 2022 which moved the training pitches (S.21/1739/FUL). Conditions on this permission have been discharged (S.22/1068/DISCON), and the archaeological investigation has begun. A further application has been submitted to relocate the parking area, which is pending consideration (S.22/1952/FUL).

6.3 The above planning applications have involved a significant amount of technical work, and considerable work is also underway on the detailed design of the Stadium. In this context, Ecotricity Group Ltd are confident on the delivery of a new stadium for FGRFC in a timely manner, which will free up the site at New Lawn for housing in line with the allocation and within the plan period. The Club anticipate that their new facilities will be completed in 3-5 years.

b) Particular issues to address, as set out in the policy, include 'enhancing local biodiversity and enhancing the landscape on this AONB edge of Nailsworth'. What are these issues, what will be required from development on this site and should they be set out in the policy?

6.4 The PS06 Site has been the subject of 2 planning applications. Application reference S.17/0850/OUT was submitted for *'the demolition of The New Lawn Football Stadium (Forest Green Rovers FC) and re-development to provide the erection of up to 95 dwellings, up to 0.11 hectares of community uses (which may include D1/D2/A3/B1 uses), landscaping, open space, associated access, parking and infrastructure.'* This was withdrawn in November 2017, and resubmitted in April 2018 (S.18/0815/OUT). This application is awaiting determination by SDC.

6.5 For the above applications, a suite of technical documentation was prepared and submitted, as well as an illustrative masterplan which shows how 95 dwellings can be accommodated on the site¹.

6.6 Regarding the landscape constraints, the site contains a number of mature trees and hedgerows around it's periphery, which were assessed within the Arboricultural Report submitted with the application. No removal of mature trees is required for the site's development, and if any limited removal of hedgerows or scrub does take place, these can be compensated for by a suitable landscaping scheme. The Council's Arboricultural Officer raised no objection to the application.

6.7 The Landscape Visual Impact Assessment (LVIA) submitted with the application highlighted that there would not be an impact on the openness or setting of the surrounding landscape. Given the existing use of the site, it concluded that there would be a neutral to slight beneficial impact on landscape fabric and landscape character, as a result of mitigation and enhancement measures such as retention of existing landscape features, new planting, and creation of open space. The LVIA also recognised that would be no significant effects or harm to the Cotswold AONB and, in certain instances, this will be enhanced at a localised level.

6.8 In terms of biodiversity, an Ecology Survey was undertaken and concludes that the redevelopment of the site will have no significant effect on statutory designated sites, particularly Rodborough Common SAC. The main ecological receptors on site were the historic hedgerow along the western boundary combined with a verge of species-rich grassland, and protected species identified in that area were slow worms, bats, birds and badgers. The retention and enhancement of this area, as well as the

¹ This Masterplan has been submitted with the representations to the Draft Plan Consultation, dated 20th January 2020.

creation of new habitat along the other boundaries of the site, would ensure that biodiversity of the site can be protected and enhanced.

6.9 The issues identified within the policy can be appropriately addressed through the masterplanning of the site in response to site constraints. It is not considered that these issues need to be explicitly set out in policy; however, no objection is raised if the Inspectors feel it is appropriate to add in.

c) The supporting text states that the 'historic hedgerow along the western boundary and the semi natural grassland parcels should be retained with no adverse impacts on adjacent wildlife sites'. Should these specific requirements be set out in policy and are they justified?

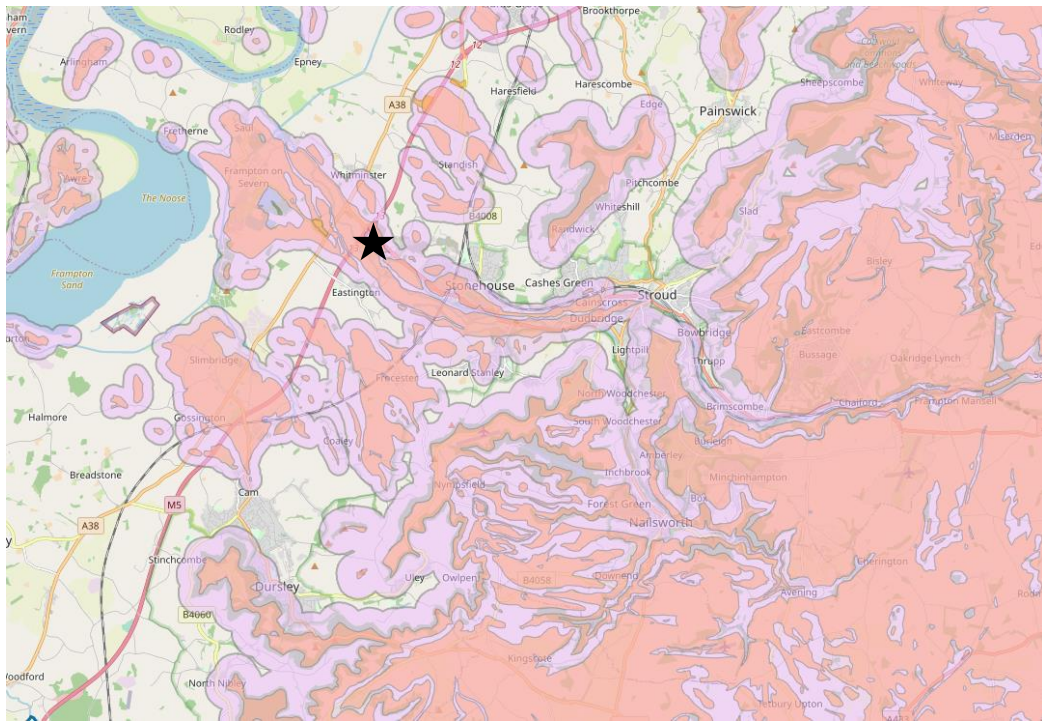
6.10 The masterplan prepared as part of the above application looks to retain the historic hedgerow. This matter can be appropriately addressed through the masterplanning of the site in response to site constraints. It is not considered that this needs to be explicitly set out in policy as these issues are covered by other policies of the Plan (namely CP5 and CP14 and ES6); however, no objection is raised if the Inspectors feel it is appropriate to add in.

d) Some of the representations raise concerns about other issues relating to the development of the site, including congestion and road access. Have such factors been suitably assessed as part of the process to allocate this site?

6.11 As part of the planning applications, a Transport Assessment was prepared by PFA Consulting which considered highway safety, trip generation and junction modelling. GCC raised no objection to the application subject to conditions, stating:

'The Highway Authority considers that this development will not have a severe impact on the local highway network. The NPPF also states that "safe and suitable access to the site can be achieved for all users", "appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location", and that "any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree". It is considered that the development proposals will meet these criteria.'

6.12 As such, the factors identified above are considered to be acceptable.



6.15 Policy MS01 of the MLPG states that non-mineral development proposals within MSAs will be permitted subject to a number of criteria.

6.16 The response from GCC to the Pre-Submission Regulation 19 Consultation (dated 21/7/21) requested that a further bullet is added to PS20 requiring any future development brief to undertake a Mineral Resource Assessment (MRA). However, the Development Plan includes the MLPG and therefore a proposal for development of the site would need to accord with the MLPG as well as the SDLPR. The additional bullet is therefore not considered to be necessary.

6.17 As part of the Eco-Park application (S.22/0206/OUT), a MRA was undertaken in line with the MLPG, which concludes that the development of the site wholly fulfils four of the five assessment criteria within Policy MS01. GCC's consultation response (8th April 2022) raised no objection with no further action required, noting that *'the application is supported by a MRA or other sufficient evidence that shows needless mineral sterilisation will not occur with the proposed development'*. As such, the MSA designation is not a constraint to the site's allocation.

b) The supporting text states that the site is 42 ha in size. Approximately 10 ha of land for business uses are defined under criterion 2. How has this been determined and is it justified? Do the other proposed uses add up to the remaining 32 ha and are they justified?

6.18 42ha of land is controlled by Ecotricity Group Ltd and is the land subject to the Eco-Park application (S.22/0206/OUT). This application was accompanied by an illustrative masterplan and parameter plans which show the distribution of land uses (included at **Appendix 1**). The allocation also includes 2.12ha of land immediately south-east, between this Site and the Travelodge.

6.19 See Promoters' Deliverability/Viability Statement within the SOCG, as well as the supporting material submitted to the SDLPR (EB91: PS20 Documents) for full justification for the proposed uses.

Employment

6.20 The Employment Land Review (ELR – EB30) highlights that 8ha of employment is proposed by Ecotricity, and that land to the south-east *'is also being proposed for employment uses and would likely be delivered as a linked scheme although possibly as a later phase, assuming success of the initial scheme.'* The application Land Use Parameter Plan shows that the employment areas and parking areas (which are proposed to be shared with the stadium), are in excess of the 8ha identified in the ELR. As such, including the additional land, at least 10ha of employment land will be delivered on the allocated site.

6.21 The employment uses are supported by the Council's evidence base, including:

- EB29: Economic Needs Assessment which supports the M5 Corridor as a key location for growth.
- EB30: ELR which looks to encourage the growth of green technologies. It also assesses the proposed allocations, with PS20 being one of two highest scoring sites.
- EB27: GFirst LEP's Draft Industrial Strategy which promotes Gloucestershire as the greenest place to live and work in England. It specifically references the Eco-Park Site as creating a vibrant hub for green technology and skills.

6.22 It will also support the Government's net-zero agenda as set out within the Net Zero Strategy: Build Back Greener (October 2021).

Other Uses

6.23 The parameter plans and illustrative masterplan at **appendix 1** show that all land uses identified within the policy, as well as a proposed transport hub, maintenance building, parking, landscaping and other ancillary works all fall within the 42ha site.

Sport

6.24 The owner of Ecotricity is also the owner of FGRFC and the new stadium and facilities required for the Club are integral to the allocation. FGRFC's existing stadium at New Lawn is heavily constrained and was not designed to accommodate frequent large match day crowds. The limited accessibility by public transport, lack of parking onsite, and issues with power and water availability to provide sufficient ancillary facilities (e.g. catering), all provide significant difficulties on match days. The Club's ambition is to continue to progress up the football leagues, and the requirements for higher leagues cannot be met at the current location. This has been acknowledged by the Football Association (FA).

6.25 In terms of training requirements, there is currently a shortage of good quality pitches in the District, and teams within the Club (including the women's and youth teams) train in multiple locations, including

in Chippenham. This provides logistical difficulties for the Club and does not foster community cohesion.

- 6.26 The intention is to relocate the Stadium and the training facilities to PS20, which will provide the Club with a ground centrally within the District, as well as consolidate its activities, help grow the sport and its community function, and future proof the Club.

Hotel

- 6.27 The SDLP identifies one of the priority issues is to continue to develop the tourism potential of the area. There is relatively limited supply of modern hotel beds within the immediate vicinity of the site, particularly a lack of luxury hotels (4-5 star), and the site is an attractive location. The proposed stadium, employment development and the reinstatement of the canal will also increase demand for hotels beds in this location.

Care Village

- 6.28 See answer to c).

- 6.29 As such, all uses proposed on site support the overall strategy for the Plan and are justified.

c) What is meant by a 'care village' and is this robustly justified in this location? Is the size of the facility (70 bed) based on need and is it viable?

- 6.30 The Eco-Park application (S.22/0206/OUT) includes the provision of a Care Village, which incorporates a 70 bed care home, care apartments and communal areas. There have been 'expressions of interest' from Care Operators in respect of this element (see **Appendix 2**). The variety of housing types will provide a genuine community with flexibility to remain on site as residents' needs change with the availability of 24-hour care on site.

- 6.31 The Gloucestershire Local Housing Needs Assessment 2019 (LHNA - EB10) highlights that the growth in the older population in Gloucestershire represents over 90% of the overall population growth. Within Stroud, the most significant growth in those over 65. The SDLPR recognises at Paragraph 4.8 that the District has an ageing population, with the number of people aged 65 and over estimated to increase by 12,227 over the Plan period. Policy DCP2 highlights that *'the development of specialist older person housing will be supported within both the owner occupied and rented sectors in accessible locations.'* It identifies that developments will be supported that, amongst others, *'increase the range of available housing options with care and support services in accessible locations.'* The allocation of a Care Village in this location meets this overall strategy.

d) As regards the Industrial Heritage Conservation Area (IHCA):

- **Paragraph 3.2.21 implies that part of the development proposals would be located within the IHCA. Is this the case?**

6.32 Yes – whilst development will fall within this area, careful design and masterplanning can ensure that any harm can be minimised.

- **Is the canal cut and towpath etc located within the site?**

6.33 Yes.

- **Criterion 9 implies that there will be harm to the IHCA from the development of the site, as the wording seeks less than substantial harm. Is this approach consistent with national policy and legislation, particularly as regards the desirability of preserving or enhancing the character or appearance of a conservation area? Is the approach justified?**

6.34 The wording of Criterion 9 is intended to clarify that the layout of uses, density, built form and character of development should ensure that any harm to the significance of the IHCA is minimised, and, if any harm is occasioned, it is less than substantial harm.

6.35 It is suitable for Criterion 9 to refer to the distinction between ‘substantial’ and ‘less than substantial’ harm, due to the different approach to these values directed by the NPPF.

6.36 The development considerations for the site include measures for the provision for the stretch of canal in this location, which was in-filled; a measure which is anticipated to bring notable public benefits, and to provide the optimum viable use for the land in that location. These would also comprise ‘heritage benefits’ which would be weighed against any specific harms to the designated area, in consideration of the overall heritage effect upon the IHCA.

6.37 However, it is noted that Historic England’s response to the Pre-Submission Regulation 19 Consultation requests that this condition should be reviewed. If the Inspectors feel it is necessary, a minor modification can be made to the policy, with suggestions as follows:

- *‘a layout of uses, density and built form and character which minimises harm to the IHCA’*
- Or
- *‘a layout, density and built form and character which reflects the sensitive landscape and heritage context provided by the IHCA’* (similar wording to allocations at Whaddon G2 and Sharpness PS36).

e) Are there particular reasons as to why certain facilities, such as the sports stadium and care village, are to be located in specific areas of the site? Does this overly restrict the development brief process?

6.38 It is requested that flexibility is drawn into the policy to allow successful masterplanning of the site. The policy requires development brief to be approved which incorporates an indicative masterplan, which *'will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.'* As such, the location of the land uses still needs to be agreed with the Council. The wording as drafted is too prescriptive and has the danger of being outdated as the masterplan progresses. Minor modifications are requested, as set out within previous representations and the SOCG, which will allow consideration of design issues during the lifetime of the Plan.

f) What progress has been made on the re-opening of Stonehouse Bristol Road rail station, what are the timescales for its delivery and is it feasible? Is criterion 15 justified?

6.39 Significant sustainable transport measures can be introduced as part of the development of PS20, irrespective of the re-opening of this station. Whilst the allocation is not dependent on the re-opening of Stonehouse Bristol Road railway station, it would enhance the accessibility to the site further as it would remove the requirement for bus connections to Cam and Dursley and would be within walking and cycling distance of the proposed allocation. Proportionate contributions are therefore justified.

g) Overall, are all the policy requirements justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?

6.40 A number of the policy requirements - with the exception of those considered separately under other Matter 6 questions above - relate to the provision of sustainable transport. These provisions are generally set out within the Sustainable Transport Strategy (EB60) and Addendum (EB108). They will support behavioural change and modal shift, and the Council's overall zero-carbon agenda. They are also reflected in both the Stadium Planning Permission (S.19/1418/OUT) and Eco-Park application (S.22/0206/OUT). These are therefore justified.

6.41 Comments on specific criteria:

- Criterion 11 - Whilst it is accepted that improvements to the A419 are required, improvements may not be required for the A38 and this should be made clearer within the policy wording.
- Criterion 14 - the Stadium Planning Permission (S.19/1418/OUT) secured a dedicated shuttle bus service to be used on match days, between the site and Stonehouse and Cam and Dursley rail stations, and Nailsworth and Stroud town centre. The provision of a shuttle bus on match days is justified, but this wording should be clearer. Furthermore, if Stonehouse Bristol Road station comes forward, the shuttle bus to Cam and Dursley will no longer be required so this should be an either/or.
- Criterion 20 – This should be removed as its too open ended and may result in a contribution for highway works that are not required or related to the allocation. All measures are appropriately covered by 10 to 18 and this is therefore unnecessary. Any improvements to the highway network should be proportionate and shared between all benefiting developments.

h) Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

6.42 In terms of Transport, the impacts of the development have been assessed in the Traffic Forecasting Report (EB61 and EB98), as agreed with GCC and National Highways (see Duty to Co-operate Statement – EB03), and within the Sustainable Transport Strategy to promote sustainable transport and align with the aspiration for net zero carbon goals. These are supported by the Transport Funding and Delivery Plan which outlines how the transport mitigation will be funded by allocations.

i) Do any policy requirements duplicate other Plan policies and if so, why is this necessary?

6.43 Whilst there is some duplication, the policy sets out specific expectation as to what is required for allocation, and reinforces the strategy set out elsewhere.

Appendix 1:

Illustrative Masterplan and Land Use Parameter Plan S.22/0206/OUT



NO	DESCRIPTION
1	Forest Green Rovers FC 5000 Seat Stadium
2	Stadium Pedestrian Zone
3	Shared Stadium and Employment Carparking
3a	VIP/Press Parking
3b	Players and Directors Parking
3c	Reinforced Grass Parking Zone
4	Seating Area
5	Hotel & Parking
6	Maintenance Building and Yard
7	Existing Building Restored (Maintenance Welfare Building)
8a	Green Technology Employment Cluster
8b	
8c	
8d	
9	Food and Beverage/Retail/Creche
10	Transport Hub (Bus and Coach Drop Off, Secure Cycle Parking, Waiting and Changing Room)
10a	Visitor Team Coach Drop Off & Parking
10b	Coach Parking Zone
11	Care Home - 70 Bed Care Apartments Communal Areas
12	Forest Green Rovers Clubhouse and Indoor Football Turf Training Pitch
13	Forest Green Rovers Natural Turf Pitches
13a	Forest Green Rovers Outdoor Football Turf Training Pitch (Artificial Playing Surface)
14	Earth Mounding with Tree Planting
15	Safeguarded Land For Canal Restoration & Towpath
16	Anaerobic Digester
17	Orchard
18	Parkland

On behalf of:

ecotricity

Produced by:

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PROJECT:

Eco-Park

DRAWING TITLE:

Illustrative Masterplan

DATE: **December 2021** SCALE: **1:4000**

REPORT REFERENCE: **Figure 7.20**

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Application Boundary

- 1 Forest Green Rovers FC 5000 Seat Stadium
 - 2 Stadium Pedestrian Zone
 - 3 Shared Stadium and Employment Carparking
 - 3a* VIP/Press Parking
 - 3b* Players and Directors Parking
 - 3c* Reinforced Grass Parking Zone
 - 3d* TV/Ambulance Parking
 - 4 Seating Area
 - 5 Hotel - 5000m2
 - 6 Maintenance Building and Yard B8 - 300m2
 - Existing Building Restored (Maintenance Welfare Building)
 - 8(a,b,d) Green Technology Employment Cluster
8a Class E - 11670m2 Class B2/B8 - 6500m2
8b Class E - 8110m2 Class B2/B8 - 4300m2
8c Class E - 11,130m2
8d Class E - 6790m2 Class B2/B8 - 7200
 - 9 Food and Beverage/Retail/Creche (Class E - 2750m2)
 - 10 Transport Hub (Bus and Coach Drop Off, Secure Cycle Parking, Waiting and Changing Room)
 - 10a Indicative Matchday Coach Drop Off & Parking Zone
 - 10b Coach Parking Zone - 25 coaches
 - 11 Care Home - 70 Bed (4550m2)
Care Apartments - 1000m2
Communal Areas - 2000m2
 - 12 Forest Green Rovers Academy Building - 1200m2 and Indoor Football Turf Training Pitch -2400m2
 - 13 Forest Green Rovers Natural Turf Pitches
 - 13a Forest Green Rovers Outdoor Football Turf Training Pitch (Artificial Playing Surface)
 - Green Infrastructure Including: (Drainage Features, Wildflower Meadows, Parkland, Orchards, Footpaths, Cycleways, Trees and Hedges)
 - 14 Earth Mounding with Tree Planting
 - 15 Safeguarded Land For Canal Restoration & Towpath
 - 16 Anaerobic Digester
 - Principal Site Access From A419
 - Bus, Coaches and Emergency Access To/From Grove Lane
 - Indicative Access Points
 - Gated Emergency Services Access Points
 - Indicative Principal Access Rd
- * Total 1200 spaces including all carparking typologies and disabled bays to GCC Standards.
Up to 25% of all parking zones to include Solar canopies.

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CLIENT: **ecotricity**

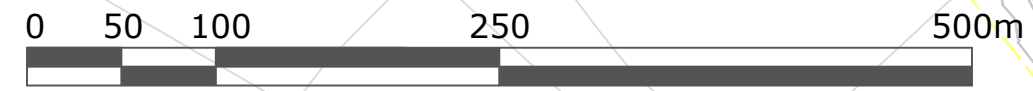
PROJECT: **Proposed Stadium and Green Technology Hub**

DRAWING TITLE: **Landuse Parameter Plan**

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DATE: 12.01.2022 SCALE: 1-4000
JOB NO.: 1998 DRAWN BY: MD

DWG NO.: 1998.L.24. REV: S08



SCALE 1:4,000

Appendix 2:

Letter from Care Home Operator

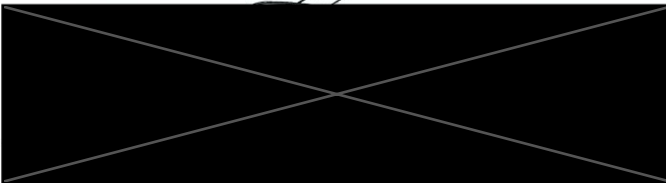
Eco Park Eastington

Marcus Beddoe - Head of Development
Ecotricity Group Limited
Lion House,
Rowcroft,
Stroud,
GL5 3BY

13th February 2023

Dear Marcus,

We are of the opinion and supported by an analysis of the data for the elderly population in the catchment area and the number of existing care beds for the elderly, that there is very significant demand for a care home at this location at junction 13 of the M5 and we fully support the proposed allocation in the local plan. We consider it to be a commercially viable and developable location and scheme and in our opinion, there is a significant demand for this type of land use in the local area and as such we would be interested in being involved in developing the site for a care home.



For and on behalf of Lovett Care Limited
Carlton Strowbridge
Acquisitions Director

