

## **Campaign to Protect Rural England: Berkeley Vale Branch**

### **Planning Application Reference S.16/0043/OUT: Further Revised Details**

**5,000 capacity football stadium and other ancillary uses (Use Class D2); up to 41,300m<sup>2</sup> of B1 floor space; up to 22,800m<sup>2</sup> of B2 / B8 floor space; indoor football playing pitch (Use Class D2), other recreational uses (Use Class D2); leisure facilities (Use Class D2), Transport Hub (including ancillary parking for cars and coaches, and a drop off point for buses and taxis), with all matters reserved save for access.**

### **Introduction**

This statement sets out CPRE's views on the further revised details to the original application. We also wish to reaffirm the objections in our original response dated 7 March 2016, and in the response dated 24 October to the first set of revisions, which we consider remain largely relevant.

### **The Football Stadium and the Supporters Club**

We have examined the summary response dated 4 March 2017 from the FGR supporters club. We cannot find on the Council's website the full submission to which the summary refers, but we assume the summary is comprehensive in its scope.

We note that the supporters club favours the relocation of the stadium. This we find surprising, in the sense that relocation would deprive many existing supporters of the opportunity to walk to the ground if they so wished.

More importantly, however, the final five bullet points in the summary, even taken together, do not in our opinion advance any material considerations sufficient to outweigh the clear lack of compliance with the Stroud District Local Plan.

We acknowledge the difficulties of access, traffic and parking to which the first part of the summary refers. We acknowledge too that the football club is likely to be doing its best to manage those difficulties. However, we have seen no evidence to suggest that they are any more significant than those experienced at other football grounds, or for example at Gloucester Rugby's stadium at Kingsholm. The extent of the problem is confined to a few hours on 23 days of the year (the number of home league matches) plus a few extra cup and friendly fixtures.

The 2016/17 season is approaching its end. Forest Green Rovers have on the whole maintained their good run of form. At the time of writing, the side now stands third in the National League, with six games to play. However, the leaders are seven points ahead with a game in hand. A play-off place rather than promotion outright is therefore the more likely prospect; there is no guarantee of promotion.

Also at the time of writing, 21 home league matches have been played, with an average gate of 1,731. The largest crowd was 2,383, against Torquay United on New Year's Day, the smallest, 1,143 against Gateshead on 13 August last year. The average of 1,731 is an increase of nearly 200 over the average of 1,538 after eight home games at the time of CPRE's objection to the revised proposal dated 24 October 2016. Nevertheless, the current average gate for this season represents only 38% of the practical maximum capacity of 4,586 (referred to in the letter to the Council from PWA Planning dated 9 September 2016), and the largest gate 52%, barely more than half. The source of the attendance figures is FGR's own website.

The supporters club may be correct in referring to a "year on year" increase in attendance. However, the rate of increase is in our view not sufficient to put pressure on the total capacity of the existing stadium in the foreseeable future.

Once again, we conclude that the case for moving the ground is no more compelling as a material consideration than it was at the time of our original objection.

### **Employment Land Assessment**

CPRE has examined the revised Employment Land Assessment prepared by Hunter Page Planning (HPP), dated February 2017.

One of the key points in it (at paragraph 2.4) is that NLP, the Council's own consultants, now appear to consider that there is a shortfall in the supply of employment land of 1.32 hectares against the Local Plan requirement of 58 hectares. This we consider to be insignificant in the context of a Local Plan adopted only about eighteen months ago.

HPP's case is then based on the proposition that the 7 hectares allocated in the Local Plan at Sharpness are unlikely to come forward in the Plan period, and that the 5.75 hectares at Hunts Grove might not come forward at all. The combined total of 12.75 hectares represents 22% of the total requirement of 58 hectares. The converse is that 78% of the requirement is available.

There is no equivalent for land for employment uses in national planning guidance of the requirement to maintain a five-year supply of land for housing, as set out in paragraph 47 of the NPPF. We acknowledge that the development of land for employment uses is "lumpier" than that for housing, where for example once a major site is started there is usually a more or less continuous supply of new housing until the site is completed. However, even if HPP are right about Sharpness and Hunt's Grove, this does not create a situation in which a remedy such as that proposed is required. Distribution and marketability are also important: if the eco business park were permitted, it might jeopardise the largest single proposed allocation for employment land in the Local Plan, on the strategic site west of Stonehouse.

We also reiterate the point made in our October 2016 submission about the commitment to early review of the Local Plan; that is, a formal review of the Plan is the appropriate means of dealing with any difficulties in the supply of land for employment uses.

## **Publicity and Design**

On the day that this statement was completed (6 April 2017) an item appeared on the Gloucestershire section of the BBC News website about the proposed development, among other things quoting the CPRE Gloucestershire Branch Vice Chairman. We consider that however attractive the images of the proposed development, they should not divert attention from what we regard as the most important issues, and the following from our statement of October 2016 remains relevant: *“We consider that the architectural merits or otherwise of this component of the proposed development are not relevant before outline planning permission has been granted. The detailed design does not matter when the bulk and mass of any stadium with the capacity proposed will have significant landscape impacts in a location which policies for the countryside apply and which therefore make any such development contrary to the development plan”*. For the avoidance of doubt, we consider that this applies to the whole of the proposed development.

## **Highways**

We note the formal recommendation of Highways England dated 22 February 2017 that the Council not grant planning permission for a period of three months. CPRE will wish to comment on any new information on this matter.

## **Conclusion**

We reproduce below the concluding section of our objection dated 24 October 2016, which we believe remains valid:

*“The extensive revisions to the proposed development do not in our opinion make it any less unacceptable. It is still a very large development in a part of the District in which policies for the countryside apply. It is not located in any of the areas identified in the relatively newly adopted Local Plan for strategic development. The case for the relocation of Forest Green Rovers, not strong at the time of the original application, is no stronger now. Finally, it remains fundamentally contrary to the development plan, and no other material considerations have been identified which are sufficient to outweigh its lack of compliance with the development plan”*.

For all the reasons set out above, CPRE once again respectfully requests the Council to refuse the application.

6 April 2017