

# Planning Statement

July 2023

Proposed Erection of A Workshop And Storage Building For Sui Generis Commercial Use In Accordance With  
The Existing Use Of The Land

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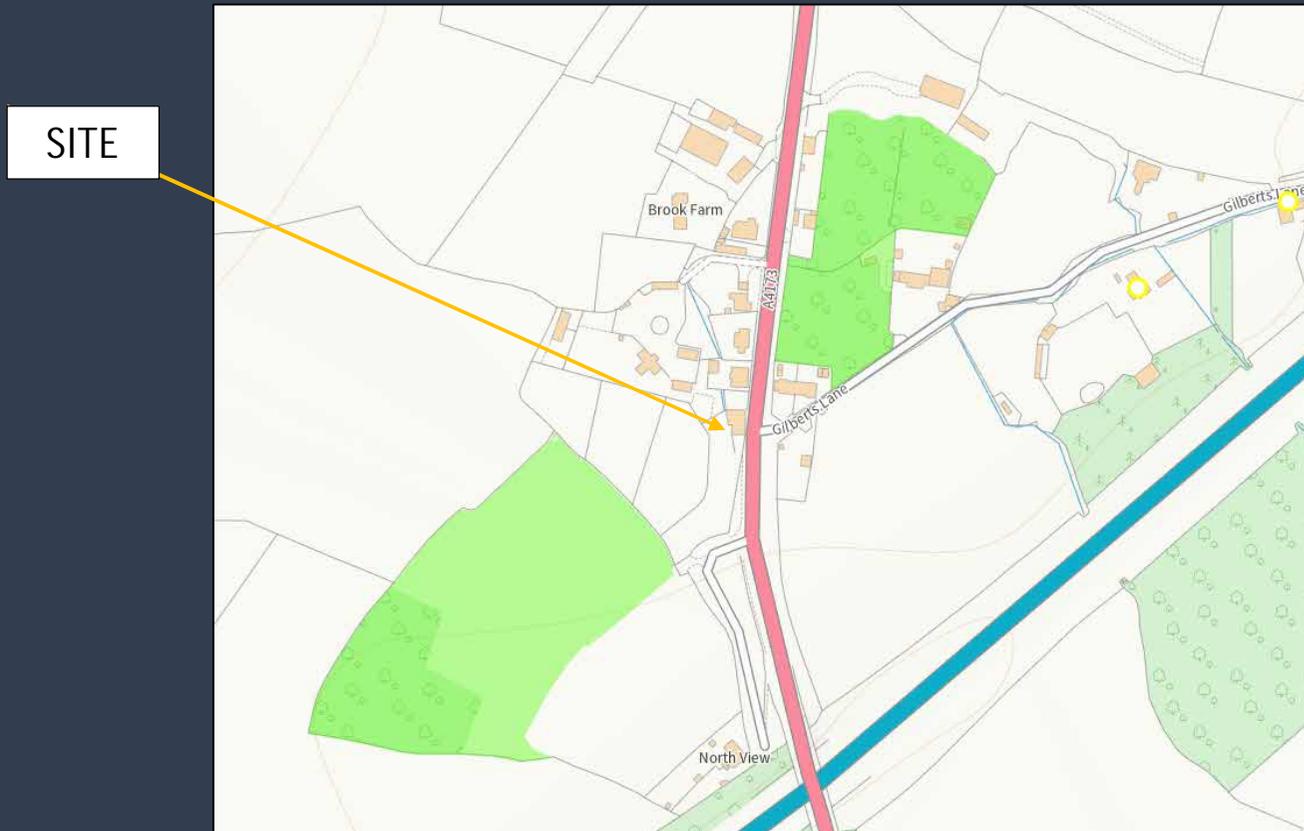
## 1. Introduction

- 1.1. This planning statement presents the proposal for a new commercial building, designed to complement and enhance the existing operations of GAL (Gloucester Asbestos Ltd), in association with their established business premises. The aim of this project is to provide GAL with additional space and modern facilities necessary for their maintaining and expanding operations.
- 1.2. GAL is one of very few specialist demolition contractors in the county and has been operating successfully from the existing office/workshop building for several years. However, due to their continued growth and increasing demand for their services, GAL now requires additional space to accommodate their upgraded working practices and to support their future business endeavors. To address these requirements, GAL has identified a suitable area at the rear of the existing GAL office building as the location for the proposed new building.
- 1.3. The proposed new commercial building has been carefully designed to respond to its setting and also its proximity to the existing Shiel House. The development will be approached with great care and attention to detail to ensure that it not only meets the functional needs of GAL but also respects the character of the surrounding area.
- 1.4. The primary objective of this planning statement is to outline the justifications for the proposed development, highlighting its compliance with relevant planning policies, its benefits for GAL and the local community, and its integration with the existing built environment. Additionally, the statement will address any potential impacts, both positive and negative, and present mitigation measures to minimize any adverse effects.
- 1.5. Through this planning statement, GAL seeks to demonstrate that the proposed new commercial building represents a well-considered and appropriate addition to their existing business operations. The project aims to contribute positively to the local economy, provide modern and efficient facilities, and ensure a sustainable future for GAL's expanding business, while upholding the aesthetic and functional integrity of the area.
- 1.6. The subsequent sections of this planning statement will provide a detailed analysis of the proposed development, including site description, policy context, justification and impact assessment to support the overall case for the new commercial build

## 2. Site Description

- 2.1. The site for the proposed new commercial building is located in Brookthorpe, within Stroud District. The land benefits from a lawful sui generis commercial use associated with the ongoing business operations of GAL, the applicant.
- 2.2. Brookthorpe and its surrounding area are characterised by a unique blend of residential properties and rural commercial employment sites. This patchwork of mixed land uses contributes to the distinct character and identity of the local area. It is essential for the Council to recognise and respect the presence of these commercial employment sites, which form an integral part of the area's fabric.
- 2.3. Situated in a sustainable location, the site offers several advantages for the proposed development. Its proximity to residential areas ensures convenient access to a skilled local workforce, contributing to the economic vitality of the community. Furthermore, the existing business operations of GAL have been well-established, indicating the company's commitment and longevity in the area.
- 2.4. As GAL's business has flourished, the need for additional space and modern facilities has become evident. The proposed new commercial building aims to provide a better, more practical working environment for GAL's staff and the day-to-day business processes. By accommodating the growing workforce and facilitating efficient operations, the development will enable GAL to continue delivering high-quality services to their clients.
- 2.5. In terms of the site's physical characteristics, it encompasses an area suitable for the construction of the new building. The location offers sufficient space for the proposed development without encroaching upon neighboring third party properties or significantly altering the existing landscape. The design and layout of the new building have been carefully considered to ensure a harmonious integration with the surrounding built environment.
- 2.6. In summary, the site for the proposed new commercial building in Brookthorpe, within the Stroud District, currently serves as a lawful sui generis commercial use associated with GAL's ongoing business. The local area is characterised by a mixture of residential properties and rural commercial employment sites, which contribute to its unique character. The location is

sustainable and well-suited to support GAL's established business, providing an opportunity to create a more practical working space and enhanced operational efficiency.



### 3. Proposed Development

- 3.1. The proposed new building is essential for several reasons, primarily driven by the limitations of the existing workshop on the ground floor of the existing building. GAL recognises that the current configuration of the workshop is impractical for the manufacturing of timber roof trusses and the efficient movement of products within the yard area, mainly due to changes in floor levels from external yard area to internal floor level.
- 3.2. As GAL expands its business operations and seeks to improve efficiency, it has become imperative to address these limitations. The proposed new building will provide a purpose-designed space that caters specifically to the manufacturing processes required for timber roof trusses and the maintenance of its business plant and machinery. With optimised floor levels and appropriate spatial arrangements, the new building will ensure a more streamlined workflow, facilitating efficient production and movement of products throughout the site as required.
- 3.3. In addition to the manufacturing processes, GAL relies on a significant amount of plant and machinery for its day-to-day operations off-site for demolition and reclamation. When these machines are brought back to the premises, they require servicing, repair, and thorough cleaning. Currently, there is no indoor location available for staff to undertake this essential maintenance work, leaving them exposed to various weather conditions.
- 3.4. The proposed new building will incorporate dedicated areas for servicing, repairing, and cleaning the machinery. Providing a sheltered and controlled environment, this indoor facility will significantly improve working conditions for staff. During winter weather conditions, it will offer protection from the elements and create a more comfortable and safe space for employees undertaking maintenance tasks. Additionally, having these operations conducted indoors will help reduce any noise, spray, or other potential nuisances associated with cleaning and maintenance, which would otherwise occur in an open area environment.
- 3.5. By addressing these specific needs of GAL's operations, the proposed new building will enable the business to run more efficiently, improve working conditions, and enhance overall productivity. It reflects GAL's commitment to continuous

improvement and their desire to provide an optimal working environment for their staff while minimising any potential disruptions to the surrounding area.



## 4. Planning Policy Context & Justification of Development

### 4.1. *National Planning Policy Framework (NPPF)*

- 4.2. The proposed development aligns with the overarching national policy framework outlined in the National Planning Policy Framework (NPPF) and its associated guidance under the NPPG (National Planning Practice Guidance). The NPPF sets out key principles and objectives to guide planning policies and decisions across the country.
- 4.3. Paragraph 84 of the NPPF, titled "Supporting a prosperous rural economy," emphasises the importance of enabling sustainable growth and expansion of businesses in rural areas. It specifically highlights two relevant aspects: a) the conversion of existing buildings and well-designed new buildings to support business growth and expansion, and b) the development and diversification of agricultural and other land-based rural businesses. The proposed new commercial building for GAL's operations aligns with Part A objectives by providing an appropriate space to facilitate the growth and efficiency of their business in a rural location. The planning policy doesn't specifically state that to benefit from Part A that your business should be agricultural.
- 4.4. Paragraph 85 of the NPPF acknowledges that in rural areas, sites to meet local business and community needs may need to be located adjacent to or beyond existing settlements. It recognises the importance of ensuring that such developments are sensitive to their surroundings, do not have an unacceptable impact on local roads, and exploit opportunities to enhance sustainability. The proposed development in Brookthorpe takes into account these considerations, aiming to integrate harmoniously with the existing built environment while minimising any adverse impacts on local infrastructure.
- 4.5. Furthermore, the use of previously developed land and sites that are well-related to existing settlements is encouraged by the NPPF. The proposal to construct the new building at the rear of the existing GAL office capitalises on suitable opportunities within the existing site, ensuring efficient land use and minimizing the impact on the surrounding area.
- 4.6. Paragraph 89 of the NPPF acknowledges the importance of differentiating between small-scale rural developments and larger developments that may affect employment centers. It states that proposals for rural offices or other small-scale rural

development should not be subject to the same sequential test requirements as larger developments. This provision recognises the unique nature of smaller-scale rural developments, such as the proposed new building, and their contribution to the vitality of rural employment. As such, the development aligns with this policy direction, promoting the growth of small-scale businesses in rural areas without imposing unnecessary regulatory burdens.

4.7. In summary on a national level, the proposed development complies with the NPPF and associated NPPG guidance, particularly regarding the support for a prosperous rural economy. It reflects the principles of sustainable growth, well-designed buildings, diversification of rural businesses, sensitivity to surroundings, and the utilisation of suitable opportunities in rural areas. The development aligns with the policies outlined in the NPPF, demonstrating GAL's commitment to operating within the parameters of national planning guidance.

#### *4.8. Stroud District Local Plan (2015)*

4.9. From a local level perspective, the Local Plan for Stroud District Council is the Stroud District Local Plan adopted in 2015. The Council is currently in the late stages of their plan review, with the plan currently being at examination stage.

4.10. The principle of allowing new buildings on PDL land is accepted in the district as demonstrated by the outline planning consent granted on Sunnyside Garden Centre, Gossington, Dursley (planning reference S.21/1829/OUT) and supported by Local Plan policy. As set out in the planning considerations for the approved application in that instance, policy E14 as it addresses development on existing employment sites within the countryside. Policy E14 allows for the extension to buildings, erection of new buildings, and the infilling in between existing employment buildings on employment sites within the countryside providing they adhere to certain criteria.

4.11. The exact policy wording for E14 is:

4.12. *“On existing employment sites in the countryside, the extension of buildings and the provision of new buildings, including infilling between existing buildings, will be acceptable provided that:*

*1. The proposal facilitates the retention or growth of local employment opportunity.*

*2. The proposal would not cause an unacceptable visual impact on the local character in term or site coverage.*

*3. There are no suitable alternative buildings or sites that can be used adjacent to the site or locality.*

*4. The proposal can avoid harm to local amenities and adjoining land uses.*

*5. The proposal would not generate significant traffic movement and volume that would lead to unacceptable environmental impacts or detriment to road safety.*

*Proposals will be expected to include measures to secure environmental improvements such as landscaping, enhancing biodiversity and incorporating SuDS.”*

#### 4.13. Analysis and Justification against Policy E14 of the Stroud District Local Plan

*4.14. In accordance with Policy E14 of the Stroud District Local Plan, the proposed development of a new commercial building at the rear of the existing GAL offices will be assessed against the following criteria:*

*1. Retention or growth of local employment opportunity:*

The proposed development supports the growth and expansion of GAL's business, thereby facilitating the retention and creation of local employment opportunities. By providing GAL with additional space and modern facilities, the new building will enhance their operational capacity and efficiency. Thus, the proposal aligns with the objective of Policy E14 in promoting local employment opportunities.

*2. Visual impact on the local character:*

The design and siting of the proposed new building will be carefully considered to ensure it does not have an unacceptable visual impact on the local character. Efforts will be made to ensure the building's design works with the existing Shiel House office and

the surrounding built environment. By maintaining an appropriate scale, materials, and site coverage, the proposal aims to preserve the visual character of the area. Therefore, it satisfies the requirements of Policy EI4 regarding visual impact.

*3. Suitability of alternative buildings or sites:*

The proposed development at the rear of the existing office is justified based on the lack of suitable alternative buildings or sites adjacent to the site or locality. Extensive consideration has been given to GAL's operational requirements and constraints. The chosen location represents the most suitable option to accommodate their specific needs, as no viable alternatives are available that could provide the required space and operational efficiency. Thus, the proposal meets the requirement of Policy EI4 regarding alternative buildings or sites. It should also be kept in mind that rural employment sites as cited within the NPPF should not be subject to the sequential testing process you would associate with large out of town retail developments.

*4. Harm to local amenities and adjoining land uses:*

The proposed development aims to avoid any harm to local amenities and adjoining land uses. Mitigation measures will be implemented to minimise potential impacts on neighboring properties and ensure compatibility with the surrounding environment. Through appropriate design, landscaping, and the incorporation of Sustainable Drainage Systems (SuDS), the proposal seeks to enhance biodiversity and secure environmental improvements. Consequently, it aligns with the objective of Policy EI4 in terms of avoiding harm to local amenities and adjoining land uses.

*5. Traffic movement and volume:*

The proposed development is not expected to generate significant traffic movement and volume that would lead to unacceptable environmental impacts or detriment to road safety. GAL's operations primarily involve manufacturing processes and the servicing and repair of its own machinery on-site with the majority of heavy site operations being undertaken away from site. The scale of operations and the size of the workforce do not indicate a substantial increase in traffic volume. Nevertheless, traffic management measures will be implemented as necessary to mitigate any potential impacts and ensure the safety and efficiency of transportation in the area. Therefore, overall the proposal aligns with the objective of Policy EI4 concerning traffic movement.

In conclusion on a policy level, the proposed development of a new commercial building at the rear of the existing office/workshop building complies with the criteria outlined in Policy EI4 of the Stroud District Local Plan. The project facilitates

the growth of local employment opportunities, minimises visual impact, utilizes the most suitable location, avoids harm to local amenities, and ensures appropriate traffic management. By satisfying these policy requirements, the proposal demonstrates its alignment with the broad policy objectives and strategic goals and objectives of the Local Development Framework.

## 5. Key Material Considerations

### 5.1. *Highways*

5.1.1. A full parking assessment has been produced by Highways Consultants Acstro. Their comments are:

5.1.2. “Based on guidance provided within the adopted parking standards it is assessed that the requirement for the site, following the proposed development, will be:

- 15 car parking spaces, including two disabled spaces
- 2 cycle parking spaces

It has been demonstrated that this can be accommodated.”

### 5.2. *Environmental Health/Residential Amenity*

5.3. The proposed development of a new building at the rear of the existing office not only addresses the operational needs of GAL but also presents significant environmental health benefits, particularly regarding noise and dust mitigation. The current outdoor practices of pressure washing vehicles and servicing and repairing machinery generate noise and dust that can potentially impact the surrounding area. However, the construction of a purpose-built building will provide opportunities for improved control and containment of noise and dust emissions.

5.3.1. *Indoor Servicing and Repair:* Currently, all vehicle pressure washing and machinery servicing and repair activities are conducted outdoors. However, with the construction of the new building, these operations will be moved indoors for most of the time. By providing an enclosed and controlled environment for these tasks, the proposed development will significantly reduce noise propagation to the surrounding area. The building's structure will help contain the noise generated during servicing and repair work, ensuring a quieter and more controlled working environment.

- 5.3.2. *Manufacturing Processes and Roller Shutter Doors:* The manufacturing processes currently carried out on the ground floor of the existing offices building require the roller shutter doors to be kept open at all times due to being a relatively small space. This practice can lead to the transmission of noise from the site to the surrounding area. In contrast, a purpose-built building will allow for the installation of appropriate ventilation and soundproofing measures. The ability to close the doors during manufacturing processes will effectively contain noise within the building, minimising its impact on the local environment.
- 5.3.3. *Reduction of Local Noise, Dust and Water Spray:* By consolidating activities within the new building, there will be a notable improvement in the management of noise, dust and water spray emissions. The containment of manufacturing processes, vehicle servicing, and repair work indoors will prevent noise propagation and dust dispersal beyond the site boundaries. This will contribute to an overall reduction in potential noise and dust impacts on the surrounding area, improving the environmental quality for nearby residents and businesses.
- 5.3.4. In summary, the proposed development of a new building at the rear the existing office building offers environmental health benefits by reducing further any noise and dust. The relocation of vehicle pressure washing, machinery servicing, and repair activities to an indoor setting will effectively contain noise emissions. Additionally, the ability to close the roller shutter doors during manufacturing processes will further minimise noise transmission. Overall, these measures will contribute to a reduction in potential noise and dust impacts on the local area, enhancing the overall environmental quality and well-being of the surrounding community.

#### 5.4. Contaminated Land

5.4.1. A desktop review of the application site has not indicated that there are any historic uses which would have led to contamination of the site. The existing use by GAL for washing down vehicles is a secondary wash down. Vehicle wheels are washed down off site pre being brought back to site. The risk of contamination is therefore significantly low. We therefore do not consider contamination is a material issue.

#### 5.5. LLFA/Drainage

5.5.1. A full drainage technical note has been prepared and provided with this application. The drainage assessment has included on site percolation testing. Surface water runoff from the proposed development is to be discharged to the existing watercourse via an attenuation system which has been sized to accommodate the 100-year plus 40% climate change event. Runoff from the existing external areas will drain directly to ground.

5.5.2. Foul water from the site shall be directed to the existing on-site system.

## 6. Conclusion

- 6.1. We have reviewed the application in detail and taken into consideration the proposals in the context of the existing use of the site. The existing site is used for commercial purposes and has a lawful use by long use. There is justification for the proposed development based on our assessment of the business overall.
- 6.2. The Council must make decisions in accordance with the development plan unless material reasons dictate otherwise. The Local Plan doesn't specifically deal with rural employment sites, and the Local Plan is over 5 years old and therefore policies are technically carrying less material weight than in an up to date plan. The NPPF supports the expansion of business in rural areas with a presumption in favor of development.
- 6.3. We do not consider there would be any resultant harm as a result of the proposed development being approved and therefore we ask the Council to consider the resubmitted application and additional technical work produced and approve the application accordingly.

END

