

Full Planning Application

Demolition of existing car dealership and servicing facility and redevelopment of the site for residential uses (Use Class C3), plus access, parking, landscaping and associated infrastructure.

Planning Statement

Former Ford Stroud Motors, London Road, Stroud, GL5 2AX

On behalf of Altus Homes.

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Author: SB



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1. Introduction

1.1. This planning statement has been prepared by Pegasus Group on behalf of Altus Homes (the “Applicant”) and supports a full planning application for the demolition of existing car dealership and ancillary servicing facility and redevelopment of the site for residential uses in Use Class C3, along with access, parking, landscaping and associated infrastructure, at the former Ford Stroud Motors, London Road, GL5 2AX.

1.2. Planning permission is sought for:

“Demolition of existing car dealership and ancillary servicing facility and redevelopment of the site for residential uses (Use Class C3), along with access, parking, landscaping and associated infrastructure.”

1.3. This Planning Statement details the background to the proposals, the context of the site, identifies relevant planning policy and demonstrates that the proposed development is in accordance with the Development Plan, when read as a whole, and should be granted planning permission, subject to relevant and appropriate conditions, without delay.

1.4. In accordance with statutory and Stroud District Council’s local validation requirements, the following supporting material is submitted alongside this Planning Statement, and collectively comprises the planning application submission. The information enables a full assessment of the proposals to be undertaken by the Local Planning Authority (LPA). The documents listed below should be read in conjunction with this Planning Statement:

Application Forms, Certificate and CIL Forms, duly completed

Planning Statement produced by Pegasus Group

Site Location Plan produced by UMAA Architects (Dwg No. 01266-03-001 Rev P01)

Proposed Site Plan produced by UMAA Architects (Dwg No. 01266-03-002 Rev P01)

Detailed Architectural Drawings of all proposed dwellings including Boundary Treatments, Materials, House Types, Bin Storage and Parking provisions produced by UMAA Architects (see list below)

Highways and Parking Plan produced by UMAA Architects (Dwg No. 01266-03-005 Rev P01)

Indicative Site Sections produced by UMAA architects (Dwg No. 01266-03-005 Rev P01)

Illustrative Streetscenes produced by UMAA architects (Dwg No. 01266-03-018 Rev P01)

Design and Access Statement produced by UMAA Architects

Transport Assessment produced by Jubb



Flood Risk Assessment and Drainage Strategy produced by Jubb

Ecological Appraisal produced by FPCR

Landscape and Visual Assessment produced Zebra Landscape Architects

Illustrative Landscape Masterplan Dwg No. L- 01

Heritage Statement produced by Pegasus Group

Air Quality Assessment produced by Rappor

Noise Impact Assessment produced by Hepworth Acoustics

Arboricultural Impact Assessment produced by MHP

15. The other architectural drawings submitted with the application comprise:

Boundary Treatments Plan Dwg No. 01266-03-002 Rev P01

Materials Distribution Dwg No. 01266-03-004 Rev P01

Bin Storage and Collection Dwg No. 01266-03-004 Rev P01

House Types A and B Plans and Elevations Dwg No. 01266-03-007 Rev P01

House Type B1 Plans and Elevations Dwg No. 01266-03-008 Rev P01

Apartment Block 1 Plans Dwg No. 01266-03-009 Rev P01

Apartment Block 1 Elevations Sheet 1 Dwg No. 01266-03-010 Rev P01

Apartment Block 1 Elevations Sheet 2 Dwg No. 01266-03-011 Rev P01

Apartment Block 2 Plans Dwg No. 01266-03-012 Rev P01

Apartment Block 2 elevations Dwg No. 01266-03-013 Rev P01

House Type G Plans and Elevations Dwg No. 01266-03-014 Rev P01

House Type H Plans and Elevations Dwg No. 01266-03-015 Rev P01

House Type J Plans and Elevations Dwg No. 01266-03-016 Rev P01

2. Application Site & Planning History

Site Description

- 2.1. The Application Site ("the Site") is shown on the submitted Site Location Plan (Dwg 01266-03-001) and covers 0.45ha of land.
- 2.2. The Site comprises two parcels of land, both irregular in shape. One is located to the north east of the A419 London Road and one to the south west side of the A419 London Road.
- 2.3. The Site is located within the administrative boundary of Stroud District Council and the Stroud Settlement Limits and is approximately 800m to the south east of Stroud Town Centre.
- 2.4. The Site is previously developed land, comprising a disused car sales showroom (former Bristol Street Motors Car Dealership) with ancillary servicing building and forecourt display area. The car sales and servicing use of the site ceased in June 2023.
- 2.5. That part of the Site that is north of the A419 London Road was utilised as a car sales centre and contains a flat-roofed building. Access is off London Road to this part of the Site.
- 2.6. That part of the Site south of the A419 London Road was utilised as the servicing operation and contains a building with a white rendered façade which is in a poor state of repair. Access is also provided off London Road to this part of the Site. This part of the Site also falls steeply away from London Road, with the building sitting approximately 2-3m below the level of the road.
- 2.7. The site is located entirely in Flood Zone 1 and is at a very low risk of surface water flooding and also flooding from rivers and the sea.

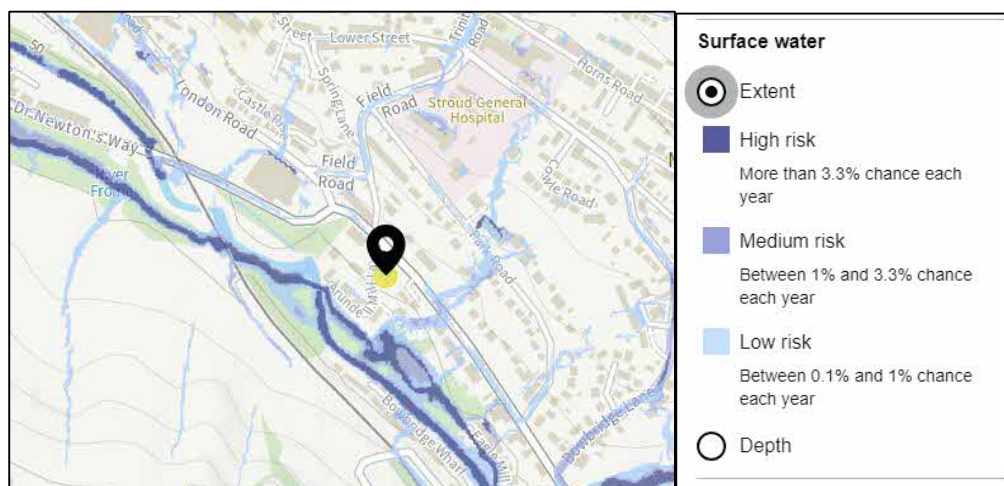


Figure 1: Flood Risk Map – Surface water. Source: [Gov.UK Flood Map](https://www.gov.uk/flood-map)

- 2.8. The closest Listed Building to the Site is the Grade II listed Arundel Mill Cottage which is approximately 70m to the south east of the Site along London Road. The Site also falls outside



of but adjacent to the Stroud Industrial Heritage Conservation Area and in proximity of the Stroud Top of Town Conservation Area.

Local Context

- 2.9. The site is within the Settlement Limits for Stroud and is part of the built-up area. The Site sits within a predominantly existing residential area and is surrounded by residential properties in all directions in the immediate vicinity. Further south is the River Frome and beyond the Chilterns Area of Outstanding Natural Beauty. To the north west is Stroud Town Centre.
- 2.10. The site is sustainably located on the urban fringe of Stroud with good access to local services and public transport.
- 2.11. Stroud Town Centre provides a wide range of services and facilities including supermarkets, homeware shops, restaurants and takeaways, bars/public houses, hairdressers, a post office, clothes shops.
- 2.12. There is also a petrol station and associated convenience facilities within 150m of the Site (to the south along London Road).
- 2.13. Stroud Hospital is approximately 350m north of the Site (as the crow flies) and the nearest primary school is the Stroud Valley Community Primary School which is 480m north, and Rodborough Community Primary School is approximately 1.2km to the west.
- 2.14. The A419 London Road provides access immediately into Stroud Town Centre to the north west. It also provides wider access to the A417 to the north towards Cheltenham and M5 to the north west towards Gloucester; the A433 to the south and M4 beyond to Bristol and Bath; and the M4 to the south east towards Swindon.
- 2.15. The closest bus services to the Site are access off London Road (less than a one minute walk from the Site along London Road), with services providing access to Stroud, Bussage, Old Sodbury and Cirencester (list not exhaustive).
- 2.16. The Site is approximately 750m to the south east of Stroud Train Station which provides access to the local and national rail network. The railway line runs to the south of the south western site parcel, beyond the River Frome but within 200m of the Site.

Planning History

- 2.17. A review of the public access system on the Stroud District Council website has identified the following planning history for the Site:

Application Reference: S.15/2 5 70 /F U L

Proposal: Demolition of petrol filling station canopy, refurbished fascia to existing building and installation of replacement window. Permitted 19/01/2016

Application Reference: S.0 5 /0 26 2/ AD V



Erection of partly illuminated signage. (Resubmission following Refusal S.0 4/2317/ADV). Amended details received 9.3.05. Approved 24/03/2005

Application Reference: S.04/2317/ADV

Erection of signage. Refused 22/12/2004.

- 2.18. The Former Bristol Street Motor garage formally closed in June 2023 and the entire business, including staff, relocated to Bristol Street Motors Ford Gloucester, Bristol Road, Gloucester, GL2 5YB.

Pre- Application Enquiry

- 2.19. Pre- application advice was sought by the Council via submission dated 14th September 2023. The purpose of the pre- app was to present the proposed residential scheme to the Council, seek advice on the principle of the redevelopment of the Site plus the number of proposed dwellings and site layout, and seek confirmation of information that would be required to support a full planning application.

- 2.20. The pre- app request also sought confirmation from the Council that the Site represented previously developed land and that the Site most recently operated as a car showroom (Use Class Sui Generis).

- 2.21. A written response to the pre- application request was received from Stroud District Council dated 2nd November 2023.

- 2.22. The Council's pre- application response made the following main points:

Stroud is a Tier 1 settlement where growth and development are focused. The Site is within the settlement limits of Stroud.

The site is within a sustainable walking distance of major services and facilities and residential development in this location would be broadly supported.

The (most recent) use of the Site as a whole falls within Use Class Sui Generis.

The loss of employment generating uses would need to be justified, with evidence to demonstrate that the site is no longer economically viable solely for employment uses. 'Wholly exceptional circumstances' should be identified.

The proposed development should be pulled away from London Road as it is overly dominant as proposed.

Four storeys of development are too large for the site. Heights should take account of the Site's proximity to Conservation Areas and visibility from the Cotswolds Area of Outstanding Natural Beauty.

Design should respond to the context of the site and its visual prominence.



Comments on the requirements for supporting information for Ecology/BNG, drainage, conservation, trees and landscaping and contamination were also provided in the pre- application response.



3. Proposed Development

3.1. The application seeks full planning permission for:

“Demolition of existing car dealership garage and the redevelopment of the site residential use, along with access, parking, landscaping and associated infrastructure.”

3.2. The proposed development of the Site is set out below and shown in detail on the proposed site layout plan (Drawing No. 0 1266- 03- 002). In summary the redevelopment of the Site comprises:

35no. residential dwellings (Use Class C3)

Two vehicular access points, one off London Road (to the north eastern site parcel), one off Arundell Mill Lane (to the south western site parcel).

Open Space

Provision of enhanced landscaping features on Site

Delivery of 1053% (habitat units) and 244% hedgerow units Biodiversity Net Gain

Provision of sustainable urban drainage system with on site

Retention of trees and hedgerows on site as far as possible

Housing Mix

3.3. The proposed residential development (Use Class C3) will deliver a total of 35 no. dwellings across an area of approximately 0.45ha, as shown on accompanying Site Layout Plan, Dwg No. 0 1266- 03- 002.

3.4. The proposed plans and elevations submitted with the application set out the accommodation proposed in detail but in summary the following is proposed:

Type	Total	Tenure Mix
1bed Maisonette	9	25.7%
2 bed Apartment	17	48.6%
3 bed House	9	25.7%



Design & Scale

- 3.5. The total site area extends to approximately 0.44ha. It is an irregular shaped parcel of brownfield land that sits on either side of London Road, on the south eastern edge of Stroud.
- 3.6. The planning application seeks approval for the redevelopment of the site for the provision of 35 no. residential dwellings. The proposed development will deliver 35 dwellings on a net developable area of approximately 0.396 ha, delivering a density of 79 dwellings per hectare.
- 3.7. The proposed development has been carefully designed to make efficient use of the land and respect its position on the outskirts of Stroud Town Centre and within the built-up urban area.
- 3.8. The scheme looks outwards onto Lond Road, providing surveillance, activity and an active frontage to London Road itself, resulting in the delivery of a mix of maisonettes, apartments and houses across the Site. To the rear of each part of the overall Site the development has been designed to provide a secondary frontage addressing the parking areas, to provide ease of access and natural surveillance of parking spaces.
- 3.9. The design has had regard to the Site's location in the built-up urban area, but also in proximity of the Cotswolds AONB and conservation areas in Stroud. It has been carefully designed to integrate into the street scene and to take account of the levels changes across the site, whilst also considering potential effects on nearby residential amenity, privacy concerns and overlooking.
- 3.10. That part of the Site on the north easter side of London Road will comprise development of 2 storey dwellings and a 3 storey apartment block. The dwellings would front London Road, each with their own individual access. A three storey corner block would then turn the corner with frontage to London Road and to the south east, with the maisonettes running at 90 degrees within the site. An undercroft access would be provided underneath apartment 17B (as shown on the proposed Site Layout Plan) to the car parking area for all dwellings to the rear. Access to all properties would also be provided from the rear courtyard area.
- 3.11. Development on the south western side of London Road would all have frontage to London Road, with the Apartment Block on the corner part of the Site where London Road meets Arundel Mill Lane. The development would comprise 5 no. 2 storey dwellings and a 3 storey apartment block with 11 units. Due to the levels changes across this part of the site, the apartment block will appear as 2 storeys fronting London Road.
- 3.12. Parking for the south western part of the Site would also have parking to the rear, with access into the apartments and rear gardens of the dwellings from the parking area directly.
- 3.13. The scale of the development correlates with existing buildings in the vicinity and is in keeping with the surrounding area in this edge of centre location but with some historic buildings in the wider vicinity which sit alongside more modern properties. Ridge and eaves heights of the buildings are set to respect neighbouring developments and not to overpower or prejudice the streetscape.



- 3.14. The finish and design of the proposed development has had regard to the character of the area with brick being a principle material alongside a palette that will reflect the local character of the area in a traditional style with detailing to pick out window openings and add to facades.

Open Space

- 3.15. The Site will provide private amenity space for the proposed houses, and on site open space and shared amenity space including planted courtyard areas, an open space area in the north western part of the site (north western side of London Road) plus amenity grassland areas to the rear of the Site on the south western side of London Road. The open space proposals are shown on the Illustrative Landscape Masterplan Dwg No. L- 20 1 submitted with the application.

Site Access/Parking

- 3.16. The proposed development will be served by two vehicular access points as shown on the Proposed Site Layout Plan.
- 3.17. On the north eastern side of London Road, the existing site access point in the south east corner of that area will be utilised and improved as required. The access will be a priority give-way junction with visibility spays of 2.4m by 48m.
- 3.18. The south western part of the Site will be served by a point of access from Arundell Mill Lane, in the form of a priority give-way junction. That junction has been designed in accordance with the actual speeds of traffic using Arundel Mill Lane and in accordance with guidance in Manual for Streets.
- 3.19. Full details of the proposed Site access points are set out in the Transport Statement accompanying the application, which includes General Arrangement Site Access Plans at Appendix D.
- 3.20. The proposed development will provide a total of 49 car parking spaces. This comprises 26 spaces on the north eastern parcel including 3 no. visitor spaces; and 23 no. on the south western parcel, including 2 no. visitor spaces.
- 3.21. Each dwelling has provision for 1 no. cycle parking space, by means of shed to all houses and bike hoops within the courtyard areas for all apartments/maisonettes.
- 3.22. There is refuse storage areas provided to all dwellings, including 'ginnel' style bin access on the north eastern parcel to allow the bins to be put on the street for collection. The apartments and maisonettes on the north eastern parcel would be provided with a covered bin store area in the undercroft with a collection point close to the site entrance. The apartments on the south western parcel would utilise a fenced bin store area to the rear of the parking provision. All bins on the south western parcel would be collected off Arundel Mill Lane.



4. Planning Policy Context

- 4.1. In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act, applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Statutory Development Plan

- 4.2. The Development Plan for Stroud District consists of the following:

Stroud District Local Plan (adopted November 2015)

- 4.3. Local Plan policies considered relevant to the determination of the application proposals are listed below:

Policy CP1- Presumption in favour of sustainable development

Confirms that the Council will apply the presumption in favour of sustainable development set out in the NPPF at paragraph 11 (2023 version).

Policy CP2 - Strategic growth and development locations

Identifies Stroud's growth aspirations which comprise at least 11,400 dwellings over the Plan period 2006- 2031. Housing development is to *"take place within settlement development limits..."*.

Policy CP3 - Settlement Hierarchy

This policy identifies Stroud as a First Tier settlement and a main town. Such settlements are the primary focus for growth and development to safeguard and enhance their roles as employment and service centres as well as providing significant levels of homes, facilities and infrastructure to enable sustainable development.

Policy CP4 - Place Making

Sets out three key design principles for new development:

1. Integrate into the neighbourhood (including connectivity and sustainability)
2. Protect or enhance a sense of place using appropriate materials, textures, colour, architectural style
3. Create safe streets, homes and workplaces with landscaping to define and enhance streets and spaces and improve legibility and permeability, reduce car domination and create safe and well- managed public and private amenity spaces.

Policy CP6 - Infrastructure and developer contributions



The policy seeks to ensure that appropriate infrastructure is available or development to meet development needs. This will be achieved through regular review of the Council's Infrastructure Delivery Plan (IDP), through securing contributions to relevant infrastructure through planning obligations, preparing a Community Infrastructure Levy (CIL) charging schedule.

Policy CP7 - Lifetime communities

The policy seeks to ensure that a range and mix of housing is delivered for all needs within the District. The policy states that developments need to identify how provision will be made to meet long-term identified needs including those of: the ageing population; children, young people and families; people with special needs including learning disabilities and dementia; and the identified needs of minority groups.

Policy CP8 - New housing development

Following on from Policy CP7, Policy CP8 requires new housing development to incorporate a range of different types, tenures and sizes of housing, taking account of the District's needs as set out in the Strategic Housing Market Assessment. Developments should be of an appropriate density to the local environment, have a layout that supports accessibility by bus, bicycle and foot, use sustainable construction techniques and provide renewable or low carbon energy sources.

Policy CP9 - Affordable housing

Policy CP9 identifies that there is an overall annual need for affordable housing of 446 dwellings per annum.

Affordable housing should be provided in residential developments at 30% of the units.

Policy CP13 - Demand management and sustainable travel measures

The Policy requires development proposals to allow for choices of modes of transport and to minimise the need to travel. There should be improvements to the existing infrastructure network for all users (vehicles, buses, cycles and pedestrians) where appropriate and appropriate car parking in accordance with the Council's standards should be provided.

Policy CP14 - High quality sustainable development

The policy seeks to ensure that new development proposals achieve a number of criteria to deliver sustainable development:

- Sustainable construction techniques, including facilities for the recycling of water and waste, measures to minimise energy use and maximise renewable energy production
- No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution



- Adequate water supply, foul drainage and sewage capacity and provision of utilities
- No increased risk of flooding on or off site
- Appropriate design and appearance
- Re-use of previously developed land
- No unacceptable impact on the amenities of neighbouring occupants
- Contribution to the retention and enhancement of important landscape and geological features, biodiversity interests, trees, hedgerows and other natural features.
- Contribution to a sense of place in the buildings proposed and the way they integrate with their surroundings
- Design that assists crime prevention and community safety
- Efficient use of land including higher density developments in locations that are more accessible by public transport
- Safe, convenient and attractive access on foot and by cycle and suitable connections to local pedestrian and cycle routes
- In a location close to essential services and good transport links to modes of travel other than the private car

Policy EI3 – Small employment sites

The policy protects small employment sites outside defined employment areas from non-employment uses such as housing, unless wholly exceptional circumstances can be demonstrated, as recommended by the Employment Land Study.

Policy EI12 - Promoting transport choice and accessibility

Development proposals should have full regard to the traffic impact on the local highway network. Transport Assessments and Travel Plans should accompany proposals which are likely to have a significant impact on the local transport network.

Policy ES1 - Sustainable construction and design

States that sustainable design and construction will be integral to new development. Planning applications should include for maximising energy efficiency, minimisation of waste and maximising recycling, conserving water resources and minimising flood risk, efficiency in materials, flexibility and adaptability for the development's life cycle, consideration of climate change. The policy also requires all applications for development to be accompanied by a Stroud District Sustainable Construction Checklist.



Policy ES2 - Renewable or Low Carbon Energy Generation

Following on from Policy ES1, the policy states that the Council will support proposals that maximise the generation of energy from renewable or low carbon sources, provided they would not adversely impact users and residents of the local area.

Policy ES3 - Maintaining Quality of Life Within Our Environmental Limits

States that planning permission will not be granted for development which leads to unacceptable levels of: noise, general disturbance, smell, fumes, loss of daylight or sunlight, loss of privacy; environmental pollution to water, land or air and an unacceptable risk to the quality and quantity of a water body; noise sensitive development in locations where it would be subject to unacceptable noise levels; increased risk of flooding on or off the site; a detrimental impact on highway safety; an adverse effect on contaminated land where there is a risk to human health or the environment.

Policy ES4 - Water Resources, Quality, and Flood Risk

The policy requires new development to incorporate appropriate Sustainable Drainage Measures (SuDs) in accordance with national standards. The scheme should be designed with site specifics in mind. Applications should not increase the risk of flooding on or off site from rivers, the sea or surface water.

Policy ES6 - Biodiversity and Geodiversity

The policy requires all new development to conserve and enhance the natural environment and all protected or priority habitats and species. Development that enhances existing sites and features will be supported.

Policy ES7 - Landscape Character

Within the Cotswolds Area of Outstanding Natural Beauty (AONB) or on land that may affect its setting, priority will be given to the conservation and enhancement of the natural and scenic beauty of the landscape, whilst taking account of the biodiversity interest and historic and cultural heritage. Developments should be in locations and propose materials, scale and uses that are sympathetic to, and complementary of, the landscape character and natural features including trees, hedgerows and water features that contribute to the landscape character and setting of the development should be retained and appropriately managed in the future.

The policy also states that opportunities for appropriate landscaping will be sought alongside all new development, such that landscape type key characteristics are strengthened.

Policy ES8 - Trees and Hedgerows and Woodlands

Development proposals should retain, protect and enhance where possible existing trees and hedgerows. Where the loss of trees for development is considered appropriate adequate replacement provision will be required.



Policy ES10 - Valuing Historic Environment and Assets

The policy seeks to ensure that Stroud's historic environment will be preserved, protected or enhanced in accordance with a number of principles which include, inter alia:

Proposals and initiatives should conserve and enhance where appropriate heritage significance. This includes townscapes, such as Stroud, where the industrial significance has influenced the townscape.

Policy ES12 - Better Design of Places

New development should create well designed, socially integrated, high quality places with legible and well planned routes and spaces, integrated activities and uses, safe and attractive public spaces and no traffic conflict. New development should make appropriate reference to any relevant Design Statements, Design Codes, Neighbourhood Plans and Secured by Design standards.

Policy ES14 - Provision of Semi- Natural and Natural Green Space with New Residential Development

The policy requires the provision of open space within new developments equivalent to at least 2ha of accessible natural green space per 1,000 population; at least one accessible 20ha site within 2km; at least one accessible 100ha site within 5km; no person living more than 300m or a 5 minute walk from their nearest area of natural green space.

Policy ES15 - Provision of Outdoor Play Space

Proposals for new residential development should deliver appropriate public outdoor playing space to achieve a standard of 2.4ha per 1,000 population including: Youth and Adult Facilities (Multi- Use Games Area) at 1.6ha per 1,000 population; Playing Pitches at 1.2ha per 1,000 population; equipped play space at 0.2- 0.2ha per 1,000 population and local area of play (LAP)/Local equipped Area for Plan (LEAP)/Neighbourhood Equipped Area for Plan (NEAP) at 0.4- 0.5ha per 1,000 population. Where achievement of this is unrealistic or inappropriate within the boundary of a development, a financial contribution will be sought in lieu of on- site provision.

ES16 - Public Art Contributions

The policy states that major developments will be required to make proportionate contributions toward the provision of publicly accessible art and design works.

Material Considerations

Emerging Local Plan - Stroud District Council Local Plan (draft 2021)

- 4.4. The emerging Stroud District Council Local Plan (draft 2021) is being examined by the Secretary of State. It was submitted for examination in 2021 and is currently on hold pending further work being undertaken by the Council, expected to resume in December 2024.



- 4.5. The policies in the emerging plan can therefore be given limited weight but the following policies are considered to be of some relevance.

Policy CP2 – Strategic growth and development locations identifies that the District will accommodate at least 12,600 additional dwellings over the Plan period 2020 - 2040 .

Policy CP3 – Settlement Hierarchy – identifies Stroud as a Main Settlement which provides good access to key services and facilities and the primary locations for growth and development. Stroud will continue to provide significant numbers of homes, jobs and supporting infrastructure.

Policy DHC1– Meeting housing need within defined settlements – notes that planning permission will be granted for residential development within defined settlement limits and boundaries subject to compliance with relevant policies.

Policy ES6 – Providing for biodiversity and geodiversity – requires development proposals to deliver a minimum 10% net gain in biodiversity.

Policy CP8 – New housing development requires development for dwellings to be well designed to meet local housing needs, incorporating a range of different types, tenures and sizes of housing as per the District's Housing Needs Assessment.

Developments should also be built at an appropriate density to its locality, support accessibility by means of transport other than the private car, use sustainable construction techniques and provide renewable or low carbon energy sources.

Policy CP9 – Affordable housing – identifies that the Council have a need for 424 affordable dwellings per annum.

National Planning Policy Framework (December 2023)

- 4.6. The NPPF sets out the Government's planning policies for England and how these should be applied in Local Plan preparation and decision-making, to deliver sustainable development. The Government published a revised NPPF in December 2023, which superseded the previous iterations of the NPPF, and the document is a material consideration in the determination of planning applications.
- 4.7. Section 2 of the NPPF defines three overarching objectives for the achievement of sustainable development and encourages local planning authorities (LPAs) to take a positive approach towards approving development.
- 4.8. Paragraph 8 confirms that there are three elements to sustainable development – economic (building a strong, competitive economy); social (providing the supply of housing required to meet needs and creating a high-quality built environment); and environmental (protecting and enhancing the natural, built, and historic environment)
- 4.9. At the heart of the NPPF, is the presumption in favour of sustainable development, set out at Paragraph 10 and detailed at Paragraph 11. This applies to both plan-making and decision-taking:



"For decision-taking this means:

c) approving development proposals that accord with an up-to-date Development Plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Section 4 relates to decision-making. Paragraph 38 is clear that LPAs should “*..approach decisions on proposed development in a positive and creative way [our emphasis] ..and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.*”

- 4.10 . Paragraph 47 reaffirms the statutory requirement that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.
- 4.11. Section 5 relates to the delivering a sufficient supply of homes. Paragraph 60 states that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed; that the needs of groups with specific housing requirements are addressed; and that land with permission is developed without unnecessary delay. Paragraph 61 requires Local Planning Authorities to plan for a mix of housing based on future and current demographic trends and Paragraph 63 requires the need for different community groups to be taken into account when establishing need, including for the provision of affordable housing. Paragraph 70 recognises the important contribution small and medium sized sites can make to meeting short term housing needs.
- 4.12. Transport policies have an important role to play in facilitating sustainable development, as set out in Section 9 and the accessibility of the development, type of use, links to public transport and car ownership levels are all considerations. Paragraph 115 is of particular relevance stating that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 4.13. Section 11 relates to making effective use of land. Paragraph 123 promotes an “*effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions*”. It is noted that meeting housing needs should be delivered whilst making as much use as possible of previously developed or ‘brownfield’ land.



- 4.14. Paragraph 128 requires planning decisions to support development that makes efficient use of land taking into account:
- the identified need for different types of housing
 - local market conditions and viability;
 - the availability and capacity of infrastructure and services;
 - the desirability of maintaining an area’s prevailing character and setting; and
 - the importance of securing well- designed and beautiful, attractive and healthy places.
- 4.15. Section 12 outlines the importance of ensuring good design through the planning process, stating that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.”*
- 4.16. Paragraph 157 states that *‘the planning system should support the transition to a low- carbon future in a changing climate’* and development should be located in areas at lowest risk of flooding from any source (paragraph 168) and ensuring sustainable drainage schemes are designed into new development (Paragraph 175).
- 4.17. Section 15 relates to conserving and enhancing the natural environment. Paragraph 180 requires development to contribute to and enhance the natural and local environment by, inter alia:
- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.



- 4.18. The NPPF requires development within the setting of Areas of Outstanding Natural Beauty (AONBs) to be *“sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”*
- 4.19. Section 16 relates to conserving and enhancing the historic environment. Paragraph 200 states that when determining applications, *“local planning authorities should require an applicant to describe the significance of any heritage assets affected, including a contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.”*
- 4.20. Paragraph 205 goes on to say, *“when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

National Design Guide (2021)

- 4.21. The National Design Guide, which should be used to guide decisions on planning applications in the absence of locally produced design codes, sets out the Government’s proprieties for well- designed places in the form of ten characteristics:

- Context – enhancement of the surroundings
- Identity – attractive and distinctive developments
- Built Form – a coherent pattern of development
- Movement – developments that accessible and easy to move around
- Nature – enhancement and optimisation
- Public Spaces – that are safe, social and inclusive
- Uses – that are mixed and integrated
- Homes and Buildings – that are functions, healthy and sustainable
- Resources – that are efficient and resilient
- Lifespan – development that is made to last.

Stroud District Five Year Housing Supply (Nov 2023)

The Council’s Five Year Housing Supply document for the Period April 2023 – March 2028 identifies that the Council can demonstrate a 5.05 year housing land supply.

Stroud District Housing Land Availability (as at 1 April 2023)



- 4.22. The Land Availability Report confirms at Table 2, that over the remaining Plan period 2020-2040, the Council still have to deliver a minimum of 12,600 dwellings at a minimum of 630 per annum. To date, the identified supply is 5,402 dwellings, meaning the Council have to identify a further 7,198 dwellings (as a minimum). The provision of housing on the Application Site would contribute toward that requirement.
- 4.23. Further, between 1 April 2016 and 31 March 2023, the Council have underprovided on affordable dwellings, delivering 1,211 affordable dwellings against a target of 2,676.

Stroud Town Centre Neighbourhood Plan

- 4.24. There is a 'made' Stroud Town Centre Neighbourhood Development Plan (2016), but the Application Site falls outside of the Neighbourhood Plan designated area.

Supplementary Planning Documents

- 4.25. The Council have adopted various Supplementary Planning Guidance/Documents which support the policies in the Development Plan. Those of relevance to the application proposals are as follows, with appropriate detail identified:

Planning Obligations Supplementary Planning Document (April 2017)

Sustainable Construction Checklist (February 2017)

Stroud District Landscape Assessment SPG (November 2000)

Stroud District Residential Design Guide SPG (November 2000)

Stroud District Residential Development Outdoor Play Space Provision SPG (November 2000)

A Heritage Strategy for Stroud District (SPA) (February 2018)

Stroud District Employment Land Review – Final Report March 2021

The Employment Land Review undertaken to support the emerging Local Plan (dated March 2021) considers employment land to be Use Classes B2/B8 and E(g). Stroud's Employment Land Availability report (latest is dated April 2023) also looks at B1 (now part of Class E), B2 and B8 uses as employment land.

Employment Land Review (2013)

In the Executive Summary for the 2013 Employment Land Study (para i) the report clearly defines its scope as the consideration of employment land and premises in 'Use Class B'. It goes on at para 1.7 to state that it covers all industrial, warehousing and distribution uses, as well as offices but at no point does it reference car showrooms (which were historically retail uses) as being considered in the review.

Para 14.12 of the report sets out criteria which should be fulfilled if the loss of employment land is proposed. Those criteria are:



Make a case that the loss of the site would not create a precedent for the loss of employment sites elsewhere in the District

Describe any problems caused by the current employment use, measures to mitigate the problems and why they cannot be overcome

Any other reasons why the site is unsuitable for employment uses

Detail how the property has been marketed, including what it has been marketed for and where it was advertised

Set out any measures that would mitigate the loss of employment land

- 4.26. Para 4.13 notes that the loss of employment land should be allowed where the present (or previous if vacant/derelict) use causes significant harm to the character or amenity of the surrounding area and no other viable alternative uses could be attracted to the site.

Legislative Context: Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.27. As set out in Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 when considering whether to grant planning permission for *“development which affects a listed building or its setting, the local planning authority [are required to] ..have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
- 4.28. Section 72(1) of the Act refers to land within a conservation area. It requires *“special attention”* to be *“paid to the desirability of preserving or enhancing the character or appearance of that area.”*



5. Technical Summary & Planning Assessment

- 5.1. This section of the Planning Statement provides an assessment of the proposed development against relevant legislation, the Statutory Development Plan and other material considerations including the National Planning Policy Framework.
- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of this application to be made in accordance with the development plan, unless material considerations indicate otherwise.
- 5.3. NPPF paragraph 22 sets out the presumption in favour of sustainable development and paragraph 11(c) confirms that this means approving development proposals that accord with an up-to-date development plan without delay. NPPF Paragraph 12 confirms that where there is conflict with an up-to-date development plan, local planning authorities may take decisions that depart from the development plan if material considerations in a particular case indicate that the plan should not be followed.
- 5.4. The following section considers the proposals having regard to any relevant policies of the development plan. The key planning issues to be considered are set out below and discussed in turn.

The Principle of Development

Heritage Impact

Design

Landscape Impact

Transport and Highways

Ecology and Biodiversity

Flood Risk and Sustainable Drainage

Noise Impacts

Air Quality Impacts

Arboricultural Impact

Principle of Development

- 5.5. The principle of residential development at the Application Site is considered to be acceptable and in accordance with the Stroud Local Plan.

Re- Use of Previously Developed Land

- 5.6. Stroud is identified in the settlement hierarchy as a First Tier settlement and a main town, which is the primary focus for growth and development in the District. The Site is within the



defined settlement boundary and the principle of development on the site is considered acceptable in accordance with Local Plan Policy CP3.

- 5.7. Further the proposed development of the Site would make efficient use of brownfield land which is currently underutilised and empty, in accordance with Policy CP14 of the Local Plan and para 123 of the NPPF.
- 5.8. Support for the use of brownfield land for alternative uses was reiterated by Michael Gove, Secretary of State (SoS) for Levelling Up, Housing and Communities, in September 2023 (Appendix 1). The SoS noted in his letter to all Council Leaders, Chief Executives and other LPAs in England, that in supporting development and regeneration around existing town and city centres, particularly to deliver housing, *“better use should be made of small pockets of brownfield land by being more permissive, so more homes can be built more quickly, where and how it makes sense ...”*.

Current Sui Generis Lawful Use – No Loss of Employment Land

- 5.9. In providing pre- application comments, the Council identified that the proposed redevelopment of the Site would need to meet the tests of Policy EI3 and demonstrate ‘wholly exceptional’ criteria for the loss of current employment land. It is our position that this policy is not applicable, for the reasons set out below.
- 5.10. The lawful use of the Site is a car showroom is a Sui Generis Use Class, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended) where Sui Generis includes *“...the sale or display for sale of motor vehicles”*.
- 5.11. The use is not comprised within the employment use classes and retail sales of cars are not defined as employment uses, albeit it is accepted that they generate employment.
- 5.12. In the Executive Summary for the 2013 Employment Land Study (para i) the report clearly defines its scope as the consideration of employment land and premises in ‘Use Class B’. It goes on at para 1.7 to state that it covers all industrial, warehousing and distribution uses, as well as offices but at no point does it reference car showrooms (which were historically retail uses) as being considered in the review.
- 5.13. Further, the Employment Land Review undertaken to support the emerging Local Plan (dated March 2021) considers employment land to be Use Classes B2/B8 and E(g). Stroud’s Employment Land Availability report (latest is dated April 2023) also looks at B1 (now part of Class E), B2 and B8 uses as employment land.
- 5.14. Further, the Site’s Sui Generis use specific lawful use would mean that if the site were to be utilised for employment uses it would need planning permission as the Sui Generis use is specific to the operations carried on with the site.
- 5.15. Finally, if required to remain in employment uses, the Site would be an anomaly in its immediate vicinity as the predominant surrounding uses in the area are residential. Potential impacts on amenity from any employment uses could give rise to impacts on the amenity of existing neighbours and restrict the uses able to operate from the Site.
- 5.16. For these reasons it is our opinion the Site should not be subject to policy EI3, being a Sui Generis use and should therefore not be subject to the ‘wholly exceptional’ criteria.



- 5.17. Notwithstanding, we understand that the Local Planning Authority would apply the Policy on the basis that the Site 'generates employment', meaning in Officers' opinion the site would fall within the remit of Policy E13.
- 5.18. We have therefore considered the requirements of Policy E13 and submit information that demonstrates that 'wholly exceptional' circumstances exist that support the redevelopment of the site. Policy E13 does not define 'wholly exceptional' circumstances but refers to the Employment Land Study 2013. At paras 14.12 and 14.13 the report suggests that demonstrating 'wholly exceptional' circumstances applicants should meet a number of criteria. The development proposals have fulfilled those criteria as follows:

The loss of the Site would not set a precedent for the loss of other employment sites

The Site was formerly occupied and operated by Bristol Street Motors, part of Vertu Motors, as a Ford dealership. Trading ceased and the Site was vacated in June 2023.

There were specific business reasons for the closure of the Site. The operation formed part of a wider business strategy whereby Ford are looking to consolidate their dealership network, reducing their UK outlets from 400 to circa 230 by 2025 (see article at Appendix 2) due to a new agency model of retailing where the manufacturer sells the vehicle via online platform and the dealership merely facilitates the transaction meaning less floorspace is required.

Of the 18 staff employed on the Site, 16 have moved to an alternative position or dealership with 2 finding alternative employment. There is therefore no loss of employment in terms of jobs as a result of the Site being redeveloped.

Finally, the Site is an anomaly in its surroundings. Uses to the immediate north, east, south and west of the Site are residential in nature and the redevelopment of this Site for residential uses would not result in other employment sites being lost as there are no immediate employment sites in the vicinity.

Problems arising from the current employment uses and why the site is unsuitable for ongoing employment uses

Vertu Motors identified that the reasons for not maintaining the London Road site in active operation related to the current site not being suitable:

The buildings are old and do not meet the Corporate Standards of Ford as a manufacturer. The drive towards electrification of vehicles requires a different type of building with larger power supplies and workshops that can accommodate heavier vehicles.

The subject property comprises a relatively small and dated dealership on a split site. Modern retailing requires larger facilities in hub locations, and it is clear that Stroud is not a hub for the motor industry.

The Site is also vacant and under utilised with old buildings that are not being maintained. A redevelopment of the Site would improve its overall visual amenity and bring it back into active use.



Other Matters – Provision of housing

The proposed development would deliver both market and affordable housing.

As set out in the Council's 2023 'District Housing Land Availability' update, the Council still have to identify a minimum 7,198 dwellings to meet the housing targets to 2040. The country is within a national housing crisis that is well documented on a national scale and the redevelopment of this brownfield site would make a positive contribution to the delivery of housing in a sustainable location.

Further, the Council have a significant shortfall of affordable housing provision as set out in Section 4 above. This is a significant shortfall and the delivery of affordable dwellings toward that need is significant.

This identified need for the provision of market and affordable housing is a significant material consideration that falls to support the proposed redevelopment of the Site and is a wholly exceptional circumstance.

- 5.19. In summary, the principle of the proposed redevelopment of this brownfield site for residential development is considered acceptable. The Site is within the built-up urban area close to the shops and services of Stroud which is at the top of the Council's settlement hierarchy; it would regenerate a currently vacant site that is no longer used as a car showroom.
- 5.20. The Site is not considered to be a current employment use as it has a lawful Sui Generis use which could not be utilised for Class E or B employment uses without requiring planning permission. The Site is an anomaly in the locality as it is surrounded by residential uses, and it would deliver much needed housing. There is no conflict with Policy EI3 of the Local Plan.

Heritage Impact

- 5.21. A Heritage Impact Assessment has been produced by Pegasus Group. There are no designated heritage assets within the Site and only two heritage assets have been considered to be potentially sensitive to development of the Site, those being the Grade II Listed Arundel Mill and Arundel Mill Cottage, and the Stroud Industrial Heritage Conservation Area.
- 5.22. In terms of the Conservation Area, while the proposed development would result in a visible change to the character and appearance of the Site the proposals have been sensitively designed to respond to and complement the existing varied streetscene of London Road whilst referencing the historical industrial context of the valley bottom to the south. There would be no impact on the overall understanding, experience and appreciation of the conservation area when viewed from or alongside it, indeed, the proposed removal of the existing development on the site may represent a minor positive enhancement. The proposed development would preserve the Stroud Industrial Heritage Conservation Area and result in no harm to the designated asset by way of changes to its setting.
- 5.23. An historic association between the Grade II listed Arundel Mill and the application site is acknowledged, but beyond falling within an historic Field estate there is nothing to indicate any functional relationship between the fields that the Site was once part of, and the mill complex.



- 5.24. Furthermore, by virtue of extensive boundary vegetation and reconfiguration of the assets' curtilage following cessation of their functional use, the special historic and architectural interest, and group value of the constituent buildings, of the Listed Arundell Mill and Arundell Mill Cottage is now best experienced at close range from within the associated domestic curtilage. Meanwhile the contribution of the asset's wider setting derives primarily from southerly designed views towards the adjacent mill pond and river with which the mill was functionally associated. By contrast, filtered views towards the Site do not contribute in any specific way towards the asset's heritage significance, via setting.
- 5.25. The Heritage Impact Assessment concludes that there would be no impact on the special architectural historic interest of the Grade II listed Arundel Mill and Arundell Mill Cottage and no harm arising from a change in the asset's setting.
- 5.26. The Heritage Impact Assessment (HIA) also acknowledges that the former servicing garage on the south western Site parcel may be regarded by Stroud District Council as a potential non- designated heritage asset. The HIA however, notes that any intrinsic interest that the building may possess is exceptionally low and derived wholly from the Art Deco style proportions of its principal elevation. It is one of a number of examples of similar buildings and the applicant does not consider it to warrant consideration as a non- designated heritage asset.
- 5.27. Notwithstanding, if the Council consider it a non- designated heritage asset, then in accordance with paragraph 209 of the NPPF, any harm to a non- designated heritage asset should be considered by the Decision Maker in a balanced judgement, having regard to the scale of harm, the significance of the heritage asset and the public benefits of the development proposals. In this case, the development proposals would result in the total loss of a building that possesses an exceptionally low level of intrinsic significance, and the house could be documented through an appropriate level of photographic building recording prior to demolition.
- 5.28. Further, the public benefits of the proposals, including the delivery of much needed housing, would outweigh any harm arising from the demolition of the building.

Design

- 5.29. The development has been designed with specific and careful reference to its location on the edge of Stroud Town Centre and within the built- up urban area.
- 5.30. The Design and Access Statement prepared by UMAA architects accompanying the application covers the design rationale for the development and also its evolution following the pre- application comments made by Officers. This section of the Planning Statement therefore considers how the proposed development complies with relevant design policies.
- 5.31. The proposed development would comply with the principles of Stroud Local Plan Policy CP4: Place- Making as follows:

Would integrate into the street scene and neighbourhood, be well connected to the Town Centre via existing road and pavement infrastructure, be accessible by bus and train as well as the car.



Would utilise appropriate materials, textures and colours in keeping with the locality including the historic buildings and new developments.

The majority of buildings in the immediate vicinity are of brick construction with a smaller number in stone. The proposed design seeks to reflect the historic character of the area, with brick being selected as the principle material in order to provide robust traditional detailing that will age well and require little maintenance.

All buildings will utilise a consistent palette of materials that reflect the local character of the area. All building detailing follows a traditional style with simple clean detailing and use of decorative brickwork to pick out window openings and to break up the facade.

A small amount of stonework will be used in order to provide contrast to window cills and to window heads in principle locations. However, the majority of the detailing will be in matching brickwork, inspired by the functional detailing found on traditional mill buildings and reflecting the historic character of Arundell Mill and its surroundings.

The proposed development and layout provides definition between public and private spaces, with clear routes into and out of the development, additional landscaping has been provided throughout the site and its appearance will be improved.

- 5.32. The proposed development also complies with the guidance in the NPPF Section 12 (para 133) on the provision of good design and the characteristics of the National Design Code:

Context – the development sits on the edge of Stroud Town centre and within the built-up urban area. It has been designed taking this position into account and the transitional position of the site toward the open countryside.

Identity – the site has been designed to have its own identity in its layout and pattern of development but in a manner which responds to the local character and existing surroundings.

Built Form – the development has been designed so that access is possible into Stroud Town Centre and to public transport links directly from the development. The development is of a scale that is proportionate to its surroundings and takes account of the site's location and levels changes within.

Movement – the site is able to provide definitive access for pedestrians and cyclists and provides suitable and safe access for all including vehicles with appropriate parking provision to serve the residential dwellings.

Nature – the site incorporates open space into its overall design, improving the on-site green infrastructure above the existing development. This includes soft and hard landscaped areas accessible to residents for their use and amenity. The site will deliver significantly in excess of 10% biodiversity net gain as a result of its development.

Public Spaces – there will be communal areas within the development including bin storage and cycle parking areas as well as green space.



Uses and Homes/Buildings – the proposed development comprises much-needed housing to meet local needs.

Resources – the development has been designed with reference to sustainability features as referred to in the information accompanying the application submission.

Lifespan – the development's location on the edge of Stroud Town Centre put it in an ideal position for redevelopment and bringing a brownfield site back into active use will secure the longevity of operations on the Site.

- 5.33. The proposed development will make efficient and effective use of under utilised brownfield land in a sustainable location, adding to the quality of the area through redevelopment of the Site which will no longer be left vacant and being a visual detraction in the local area. It will optimise the potential of the site to deliver sustainable development that is safe, inclusive and accessible to all within the built-up area of Stroud and in close proximity to shops and services. It will deliver a visually attractive scheme including improving green infrastructure and biodiversity on the Site. It is in accordance with the Government's 'build beautiful' rhetoric as set out in the NPPF and National Design Code.
- 5.34. The development also complies with Policies CP4 and ES12 of the Local Plan.
- 5.35. The proposed development will also deliver a sustainable development when considered against the criteria of Policy CP14 of the Stroud Local Plan:

It will not cause unacceptable impacts on air, noise, water, light or soil pollution either to future residents or neighbouring residents.

It will provide suitable foul and surface water drainage and will not increase the risk of flooding on or off site.

It is of a high-quality design appropriate to its location that will integrate into its surroundings.

It will re-use previously developed land and deliver higher density development in an edge of centre urban location.

The development can provide safe and convenient access by modes of transport other than the private car and shops, services and facilities can all be accessed within 1km of the Site.

Landscape Impact

- 5.36. The Landscape and Visual Appraisal (LVA) has been produced by Zebra Landscape Architects to support the application. It provides a review of the landscape character, including physical landscape resources, and views and visual amenity experienced by residents, road users and recreational users. It assesses the impact of the development on the landscape and its likely visual effects.
- 5.37. The Site is within the setting of the Cotswolds Area of Outstanding Natural Beauty (AONB) and the Settled Valley Landscape Character Type within reference to the Cotswolds AONB



Landscape Strategy and Guidelines. The area includes evidence of a strong industrial past, including communications, infrastructure and mill development within the valley floors.

5.38. The AONB Landscape Strategy and Guidelines seek to avoid development that will intrude negatively into the landscape; concentrate development within existing built-up areas; and ensure new development is proportionate to the settlement.

5.39. The LVA notes that whilst during construction and in the first year, the prevailing characteristic for the landscape of the Site would be the new development, the residual and long-term effects would lead to an overall beneficial effect through an overall magnitude of change resulting in a minor / negligible beneficial level of effect where the maturation of the landscape features, with tree, hedgerow and native structure planting would make an obvious contribution to the character of the site.

5.40. The scale and type of proposed development is such that the changes to the site would be limited to the area that is currently the former car retail site. The redevelopment of the site introducing an active land use would result in a minor/negligible beneficial level of effect to the local site area.

5.41. The construction period including demolition, noise, scaffolding and general activity would result in a moderate/minor adverse effect on the Landscape Character Area within this the Site is located. but this would be localised and limited to the construction period and would diminish with distance from the Site. Once constructed, the site is located well within the Stroud settlement boundary and the proposed use would sit within the context of other built development, on brownfield land. The scheme would continue the characteristic pattern of development within the locality and not result in an outward expansion of existing urban areas into a highly visible location. There would therefore be a very low, if not discernible effect on the landscape type of the Cotswolds AONB.

5.42. In terms of visual amenity:

There are a number of public rights of way passing through the local area, but the scheme would be seen in the context of, or blocked from view, by existing built landform which restrict direct views. The Site is within the context of an urban setting and would be seen as such.

The site is within the lower landform of the valley area and the built out scheme would not be prominent in any views.

Construction of the scheme may be discernible, but the effects and impacts would be in the context of the activity on London Road and would be temporary.

Given the intervening distance, the site's location (within the valley floor which is not prominent) and the immediate background of the urban area of Stroud there would be an imperceptible impact on amenity from the AONB.

5.43. The LVA concludes that the proposed residential development would have a very limited number of material landscape or visual effects and the redevelopment of the dis-used brownfield site would not be to the detriment of the setting to the Cotswolds Area of Outstanding Natural Beauty AONB.



- 5.44. There is therefore no conflict with Local Plan Policy ES7 or Section 15 (including para 180) of the NPPF.

Ecology and Biodiversity

- 5.45. FPCR have undertaken an Ecological Appraisal to inform the proposed development of the Site. This also includes a shadow Habitat Regulations Assessment
- 5.46. There are several national and internationally designated sites within 15km of the Site. The internationally designated sites which the application Site falls within the recognised zone of influence (Zol) are: Rodborough common SAC, which has a 3.9km Zol; and the Cotswolds Beechwoods SAC, which has a 15.4km Zone of Influence. Rodborough Common SSSI and Bisley Road Cemetery LNR lie within 2km of the application Site. Shadow Habitats Regulations Assessment (sHRA) has been completed, detailing any anticipated impacts and mitigation required on the internationally designated sites of nature conservation value within the 15km search radius. It is accepted that a financial contribution per dwelling will be required toward the Mitigation Strategy in place for the Rodborough Common SAC and toward the Strategy Access Management and Monitoring Scheme for the Cotswold Beechwoods SAC due to the Site falling within the Zone of Influence for both areas.
- 5.47. It is concluded that the financial contributions will result in no likely significant effect on the recreational effects on the two protected sites.
- 5.48. The site has low potential to house any protected species, although for completeness a single bat emergence survey is to be undertaken to the buildings on the site and a pre-demolition survey to check for nesting birds is also required should development commence between March and September.
- 5.49. The Site is predominantly hard standing with buildings and has no habitats that are of any more than local importance as they are common/widespread habitats supporting limited botanical diversity. The mature tree line along the eastern boundary will be retained and incorporated into the scheme and the loss of the current habitats will be compensated for by the provision of additional native planting within the landscaping scheme.
- 5.50. The scheme would deliver a significant biodiversity net gain enhancement of 0.70 additional habitat units an increase of 1053%, and 0.38 additional hedgerow units an increase of 244%. This meets the statutory requirements of the Environment Act to deliver a 10% net gain in biodiversity.
- 5.51. The proposed development would result in an improvement to the site in terms of biodiversity and have no adverse ecological impact. It accords with Policy ES6 of the Local Plan, para 180 of the NPPF and the requirements of the Environment Act 2021.

Flood Risk and Sustainable Drainage

- 5.52. Jubb have prepared a Drainage Strategy which supports the application which examines the drainage matters pertinent to the Site and in turn identifies a suitable drainage strategy associated with the proposed development.
- 5.53. A Sustainable Drainage System is proposed for the Site which include sufficient attenuation storage that will achieve a considerable betterment in the surface water runoff regime. The



proposed design includes cellular attenuation tanks with vortex flow control on each of the parcels of land comprising the Site, permeable paving and roof runoff through raingarden planters.

- 5.54. The raingarden planters will support selected planting that will enhance the amenity value of the site and also increase biodiversity. The Site will also benefit from extensive landscaping and the soft and hard landscape material palette will also form part of the SUDS strategy. The proposed development will reduce the contributing flow rate of foul discharge as a result of removal of the free discharge element of surface water to the sewer that is currently in operation.
- 5.55. There are identified points of connection for foul drainage adjacent to both parcels of land comprising the overall Site. The south western site has a foul sewer crossing through it and chamber in Arundel Mill Lane. The north eastern site has an adopted foul sewer in London Road.
- 5.56. The proposal has an appropriately designed drainage strategy, which complies with the requirements of Local Plan Policy ES4 and NPPF para 180.

Noise Impacts

- 5.57. The application is supported by a Noise Assessment, produced by Hepworth Acoustics. The Assessment has undertaken an assessment of all noise arising from / impacting on the Site and assessment work has been undertaken to determine the level of impact noise would have on / as a result of the proposed development.
- 5.58. In assessing the impacts of the development the following conclusions were reached:

Rail noise

The worst-case overall rail noise levels are within the 'negligible risk' category of the Professional Practice Guidance on Planning and Noise (ProPG) guidance for the day and nighttime periods.

Overall, it was found that rail noise levels were very low, due to the substantial distance between the site and rail line and the relative infrequency of the number of trains that passed by. '

It is therefore considered that the rail noise does not present any reason as to why the proposed development cannot come forward, and it was concluded that no specific mitigation is required, with regard to rail noise.

Road traffic noise

Across both parcels, the road traffic noise levels are within the 'medium risk category' of the ProPG guidance at the proposed frontages to London Road during the daytime. During the night-time, the road traffic noise levels are within the 'high risk' category.

Some noise mitigation measures are therefore required to adequately control London Road traffic noise and secure good acoustic conditions for future occupants of the proposed residential development.



Mitigation Measures

Section 4.9 – 4.18 of the Noise Report details the mitigation measures required. In summary, to control internal noise in habitable rooms to be within the correct BS 8233 /ProPG guideline values, suitable acoustic glazing and acoustic ventilation systems will need to be put in place.

Specifically, all plots adjacent to London Road should be provided with either ‘High- spec’ acoustic glazing systems with acoustic rating no less than 36db $Rw + Ctr$ and with no through- wall natural ventilation openings to London Road; or ‘Very high- spec’ acoustic glazing systems no less than 39dB $Rw + Ctr$, with any through- wall ventilators no less than 50 Db Dn,e,w .

The report also suggests the installation of acoustic screening to the exposed flank side (to London Road) of private rear gardens within the scheme, which should be 1.8m high and of a specific mass as set out in the report.

- 5.59. The proposed development would not cause any adverse impacts to existing neighbouring occupiers or proposed occupiers by way of noise, subject to the identified mitigation measures and therefore the policy accords with Policy ES3 of the Local Plan, and para 180 of the NPPF.

Air Quality Impacts

- 5.60. The application is supported by an Air Quality Impact Assessment (AQIA), produced by Rappor.
- 5.61. The Assessment sets out the work that was undertaken to consider air quality impacts on the proposed residential development or as a result of the development during construction for example. The Site is located in an existing residential area that experiences low traffic volumes with no other significant emission sources nearby.
- 5.62. The proposed development trip generation did not exceed the relevant Air Quality Management and environmental Protection UK screening criteria and the development can be considered to have an insignificant impact on local air quality.
- 5.63. The proposed development will introduce new sensitive uses to the Site and therefore, consideration was also given to the exposure of future residents to air pollution. A review of local air quality monitoring identified pollutant concentrations are below the current relevant air quality objectives. Additionally, the Site is located in an existing residential area and is not located within, or near, an Air Quality Management Area. Local emission sources were reviewed and considered unlikely to give rise to elevated pollutant concentrations within the Site.
- 5.64. The Site is therefore considered suitable for the proposed sensitive uses with regard to the current relevant air quality objectives and no mitigation is required. The proposed development does not conflict with Policy ES3 of the Local Plan or para 180 of the NPPF.



Arboricultural Impact

- 5.65. An Arboricultural Impact Assessment (AIA) has been produced by MHP to support the planning application.
- 5.66. The AIA identified that the key arboricultural features of the site are:
- A prominent linear group of mature horse chestnuts along the eastern boundary.
 - A mature offsite blue atlas cedar just beyond the western boundary.
 - An offsite group of ash trees just beyond the southern boundary.
- 5.67. The AIA notes that no significant trees need to be removed to facilitate the proposed development. The retention of the existing tarmac driveway is positive as it will limit impacts on tree roots as a result of the Site's redevelopment and it will also improve and increase daylighting to the dwellings and the proposed new tree planting will be beneficial as the planting will accrue to form a positive arboricultural impact.
- 5.68. The AIA concludes that the development proposals are feasible from an arboricultural perspective with no significant tree removal, new planting to enhance the arboricultural qualities of the site and tree protection measures being put in place during construction.
- 5.69. The development accords with the relevant limb of Policy CP14 of the Local Plan.

Transport and Highways

- 5.70. The application is supported by a Transport Statement ('TS' (ref 23389- TS- 01), prepared by Jubb. The purpose of the TS is to examine the transport and highways matters pertinent to the Site and demonstrate the suitability of the Site for residential development.
- 5.71. The TS notes that the development presents an opportunity to create a development that is sustainably located which is well- related to the existing town of Stroud and a wide range of services and facilities within, which are all within a reasonable walking and cycling distance of the Site. The Site is also well related to nearby bus stops on London Road which provide connections to a variety of destinations.
- 5.72. The two proposed site accesses have been designed in accordance with relevant guidance and the south western site access off Arundel Mill Lane has also taken into account recorded average speeds to ensure an appropriate site access can be designed.
- 5.73. The proposed parking for the Site is in accordance with the Gloucestershire Streets 2021 policy requirements, providing 44 spaces for the 35 no. dwellings and also including 5 no. additional visitor spaces. Cycle parking is also provided in accordance with the relevant guidance and 5% of the parking spaces would be provided to allow for electric vehicle charging.
- 5.74. The Transport Statement demonstrates in Section 6 that the trip rates from the proposed residential development would be lower than that of the existing car showroom use. The proposed residential dwellings will generate a maximum of 4 two- way trips in the AM peak



hour and 5 two-way trips in the PM peak hour. By contrast, the car showroom would generate a maximum of 19 two-way trips in the AM peak hour and 15 in the PM peak hour.

- 5.75. The proposed development would therefore have no additional impact on the highway network in terms of trip generation than the lawful car showroom use and would indeed result in a betterment (- 12 less two-way trips in the AM peak and - 4 less trips in the PM peak). In turn this would also improve highway safety due to there being less trips generated from the Site.
- 5.76. In summary, the TS demonstrates that the Site is suitably located and can be accessed by sustainable modes of transport, with safe access to and from the highway. The TS confirms the development proposals will not result in an unacceptable impact on highway safety or have a severe impact on the road network, and is therefore acceptable on highways grounds, in accordance with paragraph 111 of the National Planning Policy Framework 2023 and Policy EI2 of the Local Plan.
- 5.77. It is concluded that there is no reason why the development should be prevented or refused on highway grounds.



6. Planning Balance

- 6.1. The proposed development, as set out in Section 5 above, is considered to comply with the Development Plan when read as a whole and therefore in accordance with Section 387(6) of the Planning and Compulsory Purchase Act 2004 and para 11 of the NPPF, planning permission should be granted without delay.
- 6.2. The potential adverse impacts arising from the proposals would be minor adverse landscape impacts during the construction period, which would be temporary in nature.
- 6.3. There is not considered by the Applicant to be any conflict with Policy EI3 as the existing lawful use (Sui Generis) is not a strict employment use but in any case, wholly exceptional circumstances have been set out above which indicate that the Site can be redeveloped for alternative uses.
- 6.4. The Heritage Impact Assessment (HIA) also acknowledges that the former servicing garage on the south western Site parcel may be regarded by Stroud District Council as a potential non-designated heritage asset (it is noted that the Applicant does not consider it to be a non-designated heritage asset).
 - 6.1. When considering its loss, the HIA however, notes that any intrinsic interest that the building may possess is exceptionally low and derived wholly from the Art Deco style proportions of its principal elevation, but it is one of a number of examples of similar buildings and has no particularly special or qualifying features.
 - 6.2. Notwithstanding, if the Council consider it a non-designated heritage asset, then in accordance with paragraph 209 of the NPPF, any harm to a non-designated heritage asset should be considered by the Decision Maker in a balanced judgement, having regard to the scale of harm, the significance of the heritage asset and the public benefits of the development proposals. In this case, the development proposals would result in the total loss of a building that possesses an exceptionally low level of intrinsic significance, and the house could be documented through an appropriate level of photographic building recording prior to demolition. The significant benefits of the scheme, set out below, would outweigh any perceived harm caused by the loss of the existing building on the Site.
 - 6.3. In addition, the proposed development would deliver a number of benefits, as identified below. If the Council identify any conflict with Development Plan policies, these points are material considerations, which would outweigh any minor harm through conflict with the Development Plan.
 - 6.4. The development will deliver a significant biodiversity net gain of 1053% habitat units and 244% hedgerow units. This is significantly above the 10% requirement of the Environment Act 2021 and is attached moderate positive weight.
 - 6.5. The proposals will deliver a well-designed development that will deliver a high quality scheme that will sit within the local context and regenerate a currently vacant brownfield land. This is a matter which is attached moderate positive weight.



- 6.6. The provision of residential development that will make a significant contribution to the housing market in Stroud, in a country that has a national housing crisis is a benefit that can be attached very significant positive weight.
- 6.7. The delivery of construction jobs for the duration of the build period and indirect supply chain jobs created during the Site's construction period is a matter to be attached limited positive weight.
- 6.8. As referred above, it is considered that the Development Complies with the Development Plan and planning permission should be granted for the proposals but there are also a number of material considerations that outweigh any harm which may be identified through minor conflicts with any part of any Development Plan policy. The application should be granted planning permission subject to reasonable and relevant conditions.



7. Summary and Conclusions

- 7.1. This planning statement has been prepared by Pegasus Group on behalf of Altus Homes (the “Applicant”) and supports a full planning application for the demolition of existing car dealership and ancillary servicing, and redevelopment of the site for residential uses in Use Class C3, along with access, parking, landscaping and associated infrastructure, at the former Ford Stroud Motors, London Road, GL5 2AX.
- 7.2. The Site is a former car dealership and ancillary servicing facility, which ceased trading in June 2023 and is currently vacant. It is within the defined Stroud Settlement Limits and within 800m of Stroud Town Centre and railway station, with other shops and services and also bus stops, being even closer.
- 7.3. The Application Scheme proposes the redevelopment of a brownfield site in a sustainable, urban location. The development proposals would be an efficient and effective use of this under utilised Site and accord with the Government Rhetoric of developing on brownfield sites before greenfield where the use of brownfield land has been recently endorsed by the Secretary of State (SoS) for Levelling Up Housing and Communities.
- 7.4. The redevelopment of the Site comprises:
- 35no. dwellings.
 - Two vehicular access points, one off London Road (to the north eastern site parcel), one off Arundell Mill Lane (to the south western site parcel).
 - Open Space
 - Provision of enhanced landscaping features on Site
 - Delivery of 1053% (habitat units) and 244% hedgerow units Biodiversity Net Gain
 - Provision of sustainable urban drainage system with on site
 - Retention of trees and hedgerows on site as far as possible
- 7.5. In providing pre- application comments, the Council identified that the proposed redevelopment of the Site would need to meet the tests of Policy EI3 and demonstrate ‘wholly exceptional’ criteria for the loss of current employment land. It is our position that this policy is not applicable, for the reasons set out below.
- 7.6. The lawful use of the Site is a car showroom is a Sui Generis Use Class, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended) where Sui Generis includes “...*the sale or display for sale of motor vehicles*”. The use is not comprised within the employment use classes and retail sales of cars are not defined as employment uses, albeit it is accepted that they generate employment.



- 7.7. It is the Applicant's position that Policy EI3 is not applicable but notwithstanding, there are still a number of wholly exceptional circumstances supporting its redevelopment:

The loss of the Site would not set a precedent for the loss of other employment sites as there were very specific business reasons for the closure of the Site. All employed staff have been relocated where they chose to be.

The Site, land and buildings are unsuitable for retention in the same use as they are older and not capable of being modernised to meet industry standard requirements.

The Site would deliver much needed housing to meet the Council minimum housing requirements across the Plan period.

- 7.8. Other potential adverse impacts arising from the proposals would be minor adverse landscape impacts during the construction period, which would be temporary in nature.
- 7.9. The Heritage Impact Assessment (HIA) also acknowledges that the former servicing garage on the south western Site parcel may be regarded by Stroud District Council as a potential non-designated heritage asset (the Applicant does not consider it to be a non-designated heritage asset).
- 7.10. The proposed development would deliver a number of benefits. These points are material considerations, which would outweigh any minor harm through conflict with the Development Plan.
- 7.11. The development will deliver a significant biodiversity net gain of 1053% habitat units and 244% hedgerow units. This is significantly above the 10% requirement of the Environment Act 2021 and is attached moderate positive weight.
- 7.12. The proposes will deliver a well-designed development that will deliver a high quality scheme that will sit within the local context and regenerate a currently vacant brownfield land. This is a matter which is attached moderate positive weight.
- 7.13. The provision of open market and affordable dwellings will make a much needed contribution to the delivery of residential dwellings in Stroud in a sustainable location on a brownfield site, contributing to the Council's emerging housing supply targets over the period to 2040 and at a time when there is a well-documented national housing crisis. This is a matter which is attached significant positive weight.
- 7.14. Further, the proposed development of the Site will also contribute affordable housing in Stroud, which has under provided on affordable housing against its targets over the Plan period. This benefit can be attached very significant positive weight.
- 7.15. The delivery of construction jobs for the duration of the build period and indirect supply chain jobs created during the Site's construction period is a matter to be attached limited positive weight.
- 7.16. As referred above, it is considered that the Development complies with the Development Plan when read as a whole, and planning permission should be granted for the proposals but there are also a number of material considerations that outweigh any harm which may be identified through minor conflicts with any part of any Development Plan policy. The



application should be granted planning permission subject to reasonable and relevant conditions.



Appendices

Appendix 1– September 2023 SoS Letter

Appendix 2 – Ford Dealership Article

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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Department for Levelling Up, Housing & Communities

Rt Hon [REDACTED] MP

Secretary of State for Levelling up, Housing & Communities

Minister for Intergovernmental Relations

2 Marsham Street

London

SW1P 4DF

All Council Leaders/Chief Executives and
other Local Planning Authorities in England

8 September 2023

Dear Colleagues,

LONG-TERM PLAN FOR HOUSING

In July, I set out the Government's long-term plan for housing. The role of local government cannot be overstated in delivering our plan – it is only through the continued effort of local leadership, the endeavour of your teams and the engagement you lead with your communities that we will unlock the homes we need. I therefore wanted to highlight the principal elements of our long-term plan that relate to your role.

Building more homes in the right places

First and foremost, this Government is unashamedly supportive of development and regeneration in and around existing town and city centres. This is how we will get homes built where it makes sense, support growth, and enable people to get on the property ladder.

And making it easier to progress such developments is front of mind as we finalise the update to the National Planning Policy Framework (NPPF), following our consultation which attracted more than 26,000 responses. In that context, and ahead of the publication of the refreshed NPPF in the autumn, I wanted to make clear my expectation that:

- development should proceed on sites that are adopted in a local plan with full input from the local community unless there are strong reasons why it cannot;
- councils should be open and pragmatic in agreeing changes to developments where conditions mean that the original plan may no longer be viable, rather than losing the development wholesale or seeing development mothballed; and
- better use should be made of small pockets of brownfield land by being more permissive, so more homes can be built more quickly, where and how it makes sense, giving more confidence and certainty to SME builders.

Local plans

Second, we know that local plans are the best way to ensure the right homes are built in the right places, so we are introducing reforms to make plans simpler, shorter and faster to prepare.

My intention is for the regulations, policy and guidance necessary for the preparation of the first new-style local plans to be in place by Autumn 2024. In the new system, planning authorities will need to prepare, consult on and adopt plans within a 30-month timeframe - and follow the same process for each subsequent update of their plans, including examination by PINS.

In the interim, we want local authorities to continue adopting ambitious local plans, which is why we set out fair transitional arrangements in our current consultation on implementing the plan-making reforms¹. As part of these arrangements, we confirmed our intent that the last day to submit a plan under the current system will be 30 June 2025. I want to reiterate that local authorities without an up-to-date local plan are likely to be subject to the presumption in favour of sustainable development when facing applications.

As part of our consultation on the update to the NPPF, we have proposed removing the requirement for planning authorities with an up-to-date plan to demonstrate continually a deliverable 5-year housing land supply. This proposed change is intended to provide what I hope is welcome flexibility – but only where it is warranted by an authority having an up-to-date local plan, meaning one which is less than five years old. As a consequence, in the new system a planning authority wishing to benefit continuously from this new flexibility would need to start work on a new plan half-way through the five-year lifespan of an existing one.

We also consulted on a proposal to make clearer that Local Housing Need (LHN) is an advisory starting point for plan making, and that local authorities can take account of local circumstances when planning for the homes our communities need. Again, my intent in considering this change is to support more effective and responsive plan-making – and any housing number put forward by a local authority would still need to be both evidence based and tested by PINS at examination.

Planning capacity and capability

Finally, I have been conscious of the pressures on planning teams, and the backlogs that have built up as a consequence of the pandemic. To help address some of those pressures, I announced in July several initiatives aimed at bolstering capacity and capability.

The Planning Skills Delivery Fund will provide £24m over two years to help clear backlogs of planning applications and prepare for the implementation planning reforms. Local authorities can apply for up to £100,000 of support, which can be used to source additional planning officers and other specialist resources – with the deadline for first year applications closing very soon on 11 September.

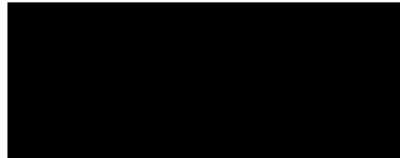
A new “super squad” of experts, backed by £13.5m of new funding, will support the delivery of large-scale development projects, starting with supporting the Cambridge Delivery Group before looking at sites across England, including in our eight Investment Zones. The department is in the process of operationalising this work with Homes England.

A comprehensive national survey of all local planning authorities will give us a fuller understanding of the skills challenges and shortages facing local government.

¹ <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation>

- National planning fees will be increased by 35% for major applications and 25% for all other applications and be indexed to inflation.

I hope these measures will be welcome, and I look forward to continuing to work together with all of you to deliver the homes people need.



RT HON [REDACTED] MP

Secretary of State for Levelling up, Housing and Communities


Minister for Intergovernmental Relations



News

Project Episode 9 Can a newbie buy used cars at auction?

Ford: 'We're cutting our dealer network almost in half over next five years'



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CarDealer

FORD is set to cut its UK dealership network by almost half as it looks to shore up ‘unsustainable’ profit levels.

The manufacturer, which currently has around 400 showrooms across the country, is looking to reduce that number to somewhere between 210 and 230 by 2025.

In a statement issued today, the company said it was ‘working together in a spirit of partnership’ with its dealers and their investors to build a ‘stronger and more sustainably profitable Ford sales and servicing network for the future’.



The aim was to create a network ‘which works for the mutual benefit of our businesses and for our commercial and passenger vehicle customers,’ it added.

Ford said its customers would not be ‘unduly inconvenienced’ when buying a new vehicle adding: ‘There will continue to be a Ford selling site within easy reach for the majority of our customers, with around 90 per cent of the population within a 30-minute drive of a Ford sales point.

‘Many of the existing smaller sales sites will be converted into vehicle servicing centres to further improve our customer service capability.’



Explaining the rationale behind the strategy, the manufacturer said: ‘Ford is becoming a more targeted business with a strong focus on growing our commercial vehicle business and providing passenger vehicle customers with a more defined portfolio. In addition, automotive retailing is pivoting to new trends, including electrification, connectivity, car-sharing and online sales.

Restructuring

‘The UK is an important part of Ford’s European transformation, continuing to be a critical market. We are the largest European sales market for commercial and passenger vehicles, and [have been] market leader in both for many decades.’

Turning to the specifics of its dealer network, it went on: ‘Ahead of the game in UK, the dealer network and Ford of Britain national sales company have undergone restructuring over the past two decades. [But] the market is changing further and dealer network profitability is still not sustainable.’

Speaking exclusively to Car Dealer Magazine this afternoon, Andy Barratt, chairman and managing director of Ford of Britain, said: 'This journey started a few years ago and we have had some natural attrition but we truly value the relationship we have with our network. They've been valued partners – in some cases, we're talking about the same family for well over 100 years.'





'You cannot disregard that level of loyalty – and it has worked both ways. You don't rip up a relationship that has lasted that long. We are actively working with every single owner and investor in our network to come up with the right solution for them for the future.'

'They have a choice as to where they spend their capital – we'd like them to keep spending their capital with Ford.'

Barratt added: 'There are some sites that will no longer sell new vehicles. It depends on the viability and it depends on the shape and format and span of control. It's not an easy answer for the purposes of an interview but we have a plan.'

MORE: [Ford boss urges government not to ban plug-in hybrids](#)

MORE: [Ford and Kia dealerships close in Sandcliffe reorganisation](#)

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