

# REPRESENTATIONS TO STROUD DISTRICT LOCAL PLAN REVIEW

SYMMETRY PARK, GLOUCESTER WEST

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Representations to Stroud  
District Local Plan Review  
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## REPORT

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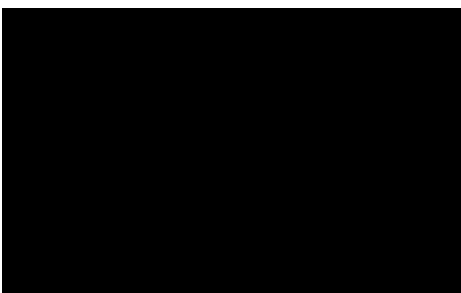
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## EXECUTIVE SUMMARY

Symmetry Park Gloucester West is strategically positioned within close proximity of junction 12 of the M5 in an area designated by the Adopted and Draft Stroud District Local Plan for Strategic Employment Development.

The site is located immediately adjacent to the Gloucestershire Energy from Waste and Gloucester 12 Employment Site and would therefore provide a logical extension to employment development in the area. The site is appropriate for the development of large-scale modern warehousing for the logistics sector and can easily accommodate the average unit size of 266,000 square feet which is required by the warehouse and logistics sector (Savills Data, 2019) and is not currently provided for in the Draft Plan.

The site is sustainably located on the fringe of Gloucester City, accessible via sustainable modes of transport and close to a large local and highly skilled workforce.

Part of the site (9 hectares) is currently proposed for allocation for employment use in the Draft Local Plan and this is supported.

However, the proposed allocation of only 9 hectares is currently unviable for employment development in its current configuration. It is proposed that the full extent of the site (27 hectares) is allocated for strategic employment development in the Stroud District Local Plan which would assist in meeting Gloucestershire's regional employment needs, and therefore demonstrating that Stroud have met the requirements of the Duty to Cooperate.

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# 1 INTRODUCTION

## Report Overview

- 1.1 This report is prepared by RPS Consulting Services Ltd ('RPS') on behalf of our Client Tritax Symmetry in relation to their interests on the land to the west of Gloucester Road, Haresfield (Symmetry Park, Gloucester West - The site) (See Site Location Plan – **Appendix 1** and Site Context Plan – **Appendix 2**).
- 1.2 This report provides representations to the Stroud District Local Plan Review Consultation.
- 1.3 These representations are supported by a Vision Document (See **Appendix 3**) which demonstrates that Symmetry Park, Gloucester West and East are highly sustainable, accessible and appropriate for the development of strategic employment which would offer a diverse range of employment opportunities for local people.
- 1.4 The sites are deliverable as stand-alone employment sites or in combination with one another. However, it is considered that there is a market need for both sites, which are capable of accommodating the average unit size of 266,000 square feet required by the warehouse and logistics sector.
- 1.5 The Vision Document demonstrates, through case studies, the benefits of Tritax Symmetry as development partner who are highly experienced in delivering high quality modern warehousing solutions for the logistics sector, which would meet the ever-increasing demand for goods from the UK population.

## Background

- 1.6 The site is located on land surrounding Quedgeley Interchange, where junction 12 of the M5 intersects the B4008. The B4008 connects the cities of Gloucester and Stroud and therefore the Quedgeley Interchange at junction 12 of the M5 is of strategic importance due to it connecting the two cities to the motorway network with wider accessibility to the rest of the Country.
- 1.7 The site extends to approximately 27 hectares and approximately 9 hectares is proposed for allocation for employment in the Draft Stroud District Local Plan (the Draft Plan).

## The High Demand for Strategic Employment Sites

- 1.8 There is a severe lack of strategic employment sites which are needed to meet the requirements of the modern warehousing sector and serve the UK population. The population's spending habits have changed, and this has resulted in a change in the nature of the logistics market and the employment demands arising from this market.

**The nature of the logistics sector has changed. Warehousing is no longer simply about the storage of product but is now focused on delivering complex supply chain solutions and accommodating all business functions under one roof. Logistics has evolved to encompass a far wider range of occupiers and employment opportunities than ever before. It encompasses every aspect of our daily lives and is an essential part of the infrastructure underpinning all other sectors of the economy.**

- 1.9 The demand for strategic employment sites is clear and most recently well demonstrated by the British Property Federation (BPF) report 'What Warehousing Where?' which sets out that 69 square feet of warehousing space is required for every new dwelling built. This figure is based on

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the 1.64 billion square feet of warehouse space divided by 24 million homes (Turley analysis of MHCLG and CoStar data, 2018 (2017 data)).

- 1.10 Warehousing and logistics have very specific site locational requirements, which essentially are large, flat sites able to accommodate large warehouses, easily accessible by road and close to a capable workforce. Such sites are quite rare. The National Planning Policy Framework (NPPF) at paragraph 82 identifies that policies should recognise and address the specific locational requirements of employment developments including that of storage and distribution (warehousing/logistics) which need to be in suitably accessible locations.
- 1.11 The average size of warehouse required by the logistics sector is 266,000 square feet (Savills Data, 2019), and currently the Draft Plan does not propose any sites large enough to accommodate this scale of warehouse.

## **Tritax Symmetry**

- 1.12 Tritax Symmetry are the Development Partner for the site and are confident that the site is fully deliverable standalone or in combination with Symmetry Park, Gloucester East, for employment use in the short term.
- 1.13 Key Facts in relation to the Company
- Portfolio of 2,900 acres, capable of accommodating 41 million square feet of B8 logistics space
  - Spec Build programme of units between 55,000 square feet – 333,000 square feet
  - End of development value of £3 billion
  - Tritax Symmetry is owned by Tritax Big Box REIT (TBBR), a FTSE 250 company
  - Gold leaf members of the UK Green Building Council

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## 2 THE SITE

- 2.1 The site is approximately 27 hectares in size (See Site Location Plan – **Appendix 1**). Approximately 9 hectares of the site is proposed for allocation in the Draft Plan (Draft Plan Site Reference PS43).
- 2.2 The site is located within an area adjacent to junction 12 of the M5 which has been urbanised by existing industrial and employment development in the surrounding area.
- 2.3 The site surrounds the Gloucestershire Energy from Waste and Gloucester 12 Employment Site (formerly known as Javelin Park Distribution Centre). The land known as Gloucester 12 is currently subject to a planning application for the development of four buildings (5 units) of B1, B2 and B8 employment use (Reference - S.19/2135/FUL).
- 2.4 St Modwen Park, Gloucester (formerly Quedgeley East Business Park) is located approximately 800 metres to the north.
- 2.5 The site formed part of RAF Moreton Valence (Haresfield Airfield), which was a Second World War Airfield and closed in 1962 (See Historic Aerial Image – **Appendix 4**).
- 2.6 The site comprises two fields and the former construction compound for the Gloucestershire Energy from Waste. To the south of the former compound is an artificial bund created as part of the Gloucestershire Energy from Waste, the bund does not provide a natural defensible boundary.

### Highways/Access

- 2.7 The site is bound to the west by the M5.
- 2.8 The site is highly accessible being located approximately 1.2 kilometres by road from junction 12 of the M5. The site would be accessed from a new roundabout on the B4008 which is proposed as part of this development.
- 2.9 The number 64 bus service between Gloucester and Stroud stops between Dobbies Garden Centre and the Gloucestershire Energy from Waste/Gloucester 12 site entrance, which is approximately 0.4 kilometres/5 minutes' walk from the site.
- 2.10 The service runs approximately every 30 minutes during the day (Monday to Saturday) with a less frequent service on a Sunday.

### Landscape

- 2.11 The site does not lie within any nationally or locally designated landscape and is currently used for arable farming. There is no Public Right of Way (PRoW) within the site.
- 2.12 The site lies within approximately 1.1km of the Cotswolds Area of Outstanding Natural Beauty (AONB) and has the potential to form part of its setting. However, given the location of the site and its proximity to existing large scale development including the Gloucestershire Energy from Waste and Gloucester 12 Employment Site, the M5 junction and corridor, Dobbies Garden Centre with associated lighting sources, there are unlikely to be any significant effects to the setting of the Cotswolds AONB. Both the Secretary of State and Inspector Brian Cook, regarding the planning appeal in of the Gloucestershire “Energy from Waste” (APP/T/A13/2200210) agreed in paragraphs 28-30 of the report, that views towards the Cotswolds AONB and expansive views out from it together with the setting of the AONB would not be conflicted and it is considered that the same would be true for Symmetry Park, Gloucester West. The effects of developing the site on views towards the escarpment would be localised, availability of views from the AONB of the site would be very limited by the wooded nature of the escarpment and industrial/commercial development and transport infrastructure are key characteristics of the Vale landscape within which it lies.

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- 2.13 The Local Character Assessment (January 2006) identifies the site as falling within Landscape Character Type (LCT) 18: 'Settled Unwooded Vale' and Landscape Character Area (LCA) SV6A: 'Vale of Berkeley'. This LCA is described as an open, gently undulating landscape broadly bounded by the rising landform of the Cotswolds escarpment to the east and by the flat, low-lying floodplain landscape of the River Severn to the west. Whilst the site is broadly consistent with the character of the wider LCA there are many urbanising factors that serve to lessen the inherent sensitivity of the site to further development; namely the large adjacent Gloucestershire Energy from Waste, Dobbies Garden Centre and car park and the adjacent main road infrastructure of the M5 Motorway and B4008. These features 'urbanise' the site and its immediate locale and differentiate it from the more intact rural landscapes elsewhere in the area. Furthermore, landscape features such as mature boundary trees within hedgerows are less frequent in comparison to surrounding areas, given the former airfield use.
- 2.14 Whilst landscape enhancements can be achieved on the draft site allocation (Draft Plan Reference PS43), there is a greater opportunity to incorporate more meaningful structural landscaping and green infrastructure if the full site area (27 hectares) were to be allocated for employment use, and offers the additional opportunity to deliver landscape character improvements in the vicinity of the Gloucestershire Energy from Waste and the Gloucester 12 Employment Site.

### **Ecology**

- 2.15 An Extended Phase 1 Ecological Survey was carried out on 10 January 2020 by EDP.
- 2.16 The site does not have any ecological statutory or non-statutory designations.
- 2.17 The site comprises a storage compound, which was used during the construction of the Gloucestershire Energy from Waste, and two fields. The larger southern field is arable land which has been planted with ryegrass and the small northern field supporting species poor semi-improved grassland. The eastern boundary consists of a species poor intact hedgerow with trees that had been box cut. The southern boundary consists of bramble scrub with trees that have been box cut. To the west of the site is a fence line behind which are mature trees and scrub patches, with the M5 motorway beyond. Within the east of the southern field is a large area of bramble scrub containing clearings of tall ruderal. The south east of the site has a hardstanding track which leads further north to an area of bare ground that has been used during the construction of the Gloucestershire Energy from Waste. There is a pond located 60m north of the site and no other ponds within 250 metres.
- 2.18 The Ecological Appraisal undertaken by EDP considers the habitats on site are low in their intrinsic value and are unlikely to support either unique or exceptional species populations, and consequently, there are no significant ecological constraints posed by habitats on-site.
- 2.19 Given the low intrinsic value of the habitats present, allocation of the whole site (27 hectares) gives a greater opportunity to deliver a meaningful biodiversity gain.

### **Heritage & Archaeology**

- 2.20 The site contains no designated heritage assets.
- 2.21 The closest designated heritage asset is located approximately 220 metres to the west but separated from the site by the M5 and comprises a Grade II listed house (Hiltmead). 800 metres to the east are a number of highly graded designated heritage assets within the settlement of Haresfield, which include 'The Mount' moated site which is a nationally important scheduled monument, and the Grade II\* Church of St Peter.
- 2.22 Both the draft allocation (Draft Plan Reference PS43) and the site as a whole have the potential to form part of the setting of all or at least many of these designated assets. However, EDP's initial assessment suggests, that whilst this may be the case, it is not considered that development within either the draft allocation or the wider site would cause a change within the setting of these



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assets such that their significance would be negatively affected. This assessment is in agreement with the Council's own assessment for site HFD 012 (Site A), within the SALA New Sites Update Report (Stroud District Council November 2019), which states that: *"An initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to a designated heritage asset"*

- 2.23 Based on a preliminary assessment of the archaeological potential of the site, it is considered that the site is highly unlikely to contain features of anything other than local significance. Additional features relating to the former airfield on the site may be encountered but this will not restrict its development.

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## 3 REPRESENTATIONS

- 3.1 We set out below our representations to the Stroud District Local Plan Review.
- 3.2 We firstly address the subject of the Duty to Cooperate and then make our representations in relation to specific sections and policies in the Draft Plan.

### Duty to Cooperate

- 3.3 Under the Localism Act 2011, local authorities are required to tackle strategic planning issues that are “*larger than local*” and cut across administrative boundaries.
- 3.4 The NPPF is clear that “*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within neighbouring areas.*” (Paragraph 11, NPPF).
- 3.5 The Adopted Local Plan 2015 does not provide for meeting the unmet housing and employment needs of neighbouring authorities. However, Adopted Policy CP2 sets out a commitment for Stroud District Council to “*give due consideration to the need to assist other local planning authorities in this housing market area in meeting their unmet objectively assessed development and infrastructure needs, including through an early review of this Local Plan, to ensure that any shortfalls that may arise in the delivery of housing and employment growth (as identified through the other authority’s local plan process) are provided for in sustainable locations.*” (The Local Plan 2015, Core Policy CP2).
- 3.6 The Inspector of the Stroud Local Plan 2015 endorsed the approach for Stroud District Council to consider other Local Authorities’ needs through a Local Plan Review during his Examination of the Local Plan in 2015. He stated that in order to make the plan sound the Council should “*Amend the commitment to Policy CP2 to an early review of the Plan commencing within five years of adoption or by December 2019, whichever is the sooner, and recognise the possibility of considering the need to assist other local planning authorities in the housing market area in meeting their future unmet objectively assessed development and infrastructure needs*” (Non-technical summary, Inspectors Report – Stroud Local Plan, November 2015)
- 3.7 At paragraphs 2.30 and 2.31 of the Draft Plan the Council have recognised the need to assist Gloucester City in meeting its unmet housing need. However, the Council have not referenced the need to help Gloucester City, a requirement of the NPPF, and, also the wider region, in meeting any unmet employment need.
- 3.8 As endorsed by the Inspector, and also a requirement of the NPPF, to ensure the Draft Plan is found sound, we propose that the Council make clear at the outset of the Draft Plan their commitment to assist Gloucester City and the wider region in relation to housing and employment need.
- 3.9 We therefore propose the following additional paragraph be inserted into the Draft Plan at paragraph 2.29 and paragraphs 2.30 and 2.31 to be amended as follows.

#### **“Meeting the needs of Gloucestershire**

**Stroud District Council recognise that some housing and employment needs are larger than local and cut across administrative boundaries. For example, strategic scale employment such as storage and distribution (logistics) serves a region and often wider, therefore, through joint working with the Gloucestershire Authorities through the Gloucestershire Economic Needs Assessment and GFirst LEP Local Industrial Strategy, Stroud District Council has been able to identify land surrounding junction 12 of the M5 (Symmetry Park West and East and an extension to St Modwen Park, Gloucester), which is appropriate for the allocation of strategic scale employment development which will assist the needs of Gloucestershire as a whole.**

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## **Meeting Gloucester's needs**

2.30 The Joint Core Strategy for the Gloucester City, Tewkesbury Borough and Cheltenham Borough areas has identified that in the longer-term additional sites will be required to meet Gloucester's housing, employment and infrastructure needs beyond 2028. Stroud District Council is committed to working together with these authorities and other authorities in Gloucestershire to identify the most sustainable sites to meet ~~these~~ future housing, employment and infrastructure needs.

2.31 An assessment of potential alternative sites to meet Gloucester's long-term housing and employment needs has identified that sites within Stroud District at the Gloucester fringe are functionally related to Gloucester and offer the potential to meet Gloucester's needs in accessible locations."

## **Making Places – The Development Strategy**

### **Setting the Scene**

- 3.10 The Draft Plan sets out 40 key issues, challenges and needs facing the District.
- 3.11 We note that Issue number 10 pledges "Working with neighbouring authorities to meet the needs of the housing market area as a whole" (Page 16, Draft Plan), however none of the 40 key issues address the need for Stroud to meet the employment needs of neighbouring authorities as required by the NPPF.
- 3.12 Gloucester City has a tightly constrained administrative boundary as a result of the Green Belt to the north of the City and therefore it has been identified by Gloucester and neighbouring authorities, that a significant amount of Gloucester's development needs will need to be met outside of the administrative area. As referenced in the above section in respect of the Duty to Cooperate this includes both housing and employment needs.
- 3.13 We therefore propose that a new Issue is included in the "Economy" section stating the following:
- "Working with neighbouring authorities to help meet the employment needs of Gloucestershire as a whole."*

### **A Vision for the future**

- 3.14 Within the Draft Plan the District Council pose the question "What do you think of this draft vision, which builds upon the vision in the Current Local Plan? Does it reflect what you value about Stroud District and where you would like us to be in 20 years' time?"
- 3.15 The M5 runs through the centre of the District with junctions 12 and 13 located in the northern quarter of the District. The M5 forms part of the strategic motorway network providing accessibility to the south west and the wider UK, and therefore Stroud is strategically positioned on this motorway network. The Draft GFirst LEP Draft Local Industrial Strategy rightly identifies the M5 spine as "a focus for growth in Gloucestershire and beyond"
- 3.16 The "Vision 2040" contained within the Draft Plan does not draw upon the District's strategic position on the M5 corridor and how this could shape Stroud over the plan period.
- 3.17 We therefore propose that the "Vision 2040" is amended as follows:
- "Vision to 2040 ...*

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*Stroud District sits at the south-western edge of the Cotswolds Area of Outstanding Natural Beauty and extends westward across the Severn Vale, which is bordered by a rich estuarine landscape. This Vision draws upon our special environmental, social and economic qualities.*

*The District's strategic position on the motorway network has been sustainably utilised for employment development which has provided a diverse range of employment opportunities for the local and highly skilled workforce.*

*Our rural District is living, modern and innovative. We have responded to climate change, becoming carbon neutral by 2030 and continuing to adapt our lifestyles to live within our environmental limits, including travelling in sustainable ways. Our District supports a network of market towns, well connected to their rural hinterlands and complementary to the role of wider regional centres. Each contributes to our sustainable and thriving local economy. We capitalise on our heritage, skills, and knowledge – exploiting our unique assets to nurture growth, particularly in high tech, green technologies, creative industries and tourism. We are adaptable and able to respond to changing needs and modern lifestyles.*

*We enjoy a high quality of life within our healthy, vibrant and diverse communities – large and small, urban and rural. These have a strong sense of their own identity and local distinctiveness – from Wotton-under-Edge in the south, to Stroud Town in the centre and Upton St. Leonards in the north. They are all safe and secure places, where the elderly and vulnerable are supported and young people have opportunities. Every day we see the richness, diversity and beauty of our District. We nurture our high-quality landscapes, green spaces, flourishing wildlife and historic and cultural heritage, from our arts and crafts, through to the Cotswold Canals and our wool and cloth mills.”*

## Strategic Objectives

3.18 The Strategic Objectives in the Draft Plan do not reference Stroud's commitment to work with neighbouring authorities to meet identified unmet housing, employment and/or infrastructure needs.

3.19 We therefore propose a new Strategic Objective which states:

*“Strategic Objective SO2a*

*Accommodating where appropriate employment development which meets the needs of the local and regional economy”*

## The Development Strategy

3.20 The Draft Plan sets out a preferred development strategy which incorporates aspects of the four strategy options that were consulted on during the Issues and Options Consultation 2017.

3.21 One of the draft strategy's headlines states that the Plan “*will distribute at least 12,800 additional dwellings and sufficient new employment to meet needs for the next 20 years*” (Draft Local Plan, Paragraph 2.11, Page 26).

3.22 We support the strategy to provide new employment to meet the needs for the next 20 years. To ensure this strategy is deliverable the Draft Plan must provide a wide range of employment opportunities to ensure that a range of skilled jobs are available to the local workforce.

3.23 We support the strategy that “*Further strategic employment growth will also be concentrated at accessible locations within the A38/M5 corridor*” (Draft Local Plan, Paragraph 2.14, Page 26). However, in our view the Draft Plan does not propose any strategic scale employment sites which would help to meet national and regional needs. We go into detail on this point at paragraph 3.26

to 3.31 of this report and propose a solution through the allocation of the whole 27 hectares of land to the west of Gloucester Road (Symmetry Park, Gloucester West).

## Local economy and jobs

### Economic Needs

- 3.24 We note that the District Council is commissioning an Economic Needs Assessment and until this has been completed the Council cannot be certain of the land requirements and therefore the number of sites which will need to be allocated for employment.
- 3.25 The Draft Plan has identified that there is a need to provide for at least 50 hectares of additional employment land and this is based upon past take up rates, however this is not an accurate way of calculating land requirements in accordance with the Planning Practice Guidance.

### Strategic Employment Sites

- 3.26 The Planning Portal Glossary defines a Strategic Employment Site as  
**“A key employment site in a strategic location capable of accommodating major investment, often of national or regional significance”**
- 3.27 The Draft Plan recognises that strategic employment growth should be centralised in accessible locations which includes the M5 Corridor. The Draft Plan does not however provide strategic employment sites capable of meeting national or regional needs as it does not allocate large enough sites in appropriate accessible locations for such uses.
- 3.28 The employment sites proposed for allocation at Draft Policy CP2 are outlined in the table below and vary in size from 5 to 10 hectares. No sites larger than 10 hectares are proposed to be allocated in the Draft Plan, and therefore no sites are proposed to be allocated to accommodate national or regional scale warehousing. As such, none of these sites are capable of accommodating the average unit size of 266,000 square feet required by the sector (Savills Data, 2019), and therefore cannot meet the specific requirements of the modern logistics sector, contrary to paragraph 82 of the NPPF.

Strategic sites ▼	Hectares at each
Quedgeley East Extension	5 ha
Javelin Park	9 ha
Sharpness Docks	7 ha
Sharpness	10 ha
Stonehouse North West	5 ha
Stonehouse Eco-Park (M5 J13)	10 ha
Wisloe	5 ha
Renishaw New Mills	10 ha
<b>Total ▶</b>	<b>61 ha</b>

▲ Table 5 ... distribution of new employment land (Core Policy CP2)

(Source: Draft Local Plan - Core Policy CP2)

- 3.29 The Draft Strategy in relation to “Meeting Stroud Districts’ employment needs up to 2040” states:  
*“new employment sites of varying sizes and locations to meet the specific locational requirements of different sectors, with particular support for green technology hubs”*
- 3.30 To meet the draft strategy’s objective, large strategic scale sites should be allocated to meet the regional needs of the modern warehousing sector. The average size of warehouse required by the

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logistics sector is 266,000 square feet (Savills Data, 2019), and currently the Draft Plan does not propose any sites large enough to accommodate this scale of warehouse.

- 3.31 Storage and Distribution uses have very specific site locational requirements, which essentially are large, flat sites able to accommodate large warehouses and easily accessible by road. Such sites are quite rare. The NPPF at paragraph 82 identifies that policies should recognise and address the specific locational requirements of employment developments including that of storage and distribution which need to be in suitably accessible locations.

## Core Policies

### NEW Core Policy DCP1

- 3.32 To support the Draft Plan's target to become Carbon Neutral by 2030, all new employment development sites need to be located on sites that minimise the need to travel and, therefore, should be located within close proximity of a local workforce. Symmetry Park, Gloucester West is located close to several strategic housing sites on the south east Gloucester fringe and an existing frequent bus service (approximately every 30 minutes at peak hours) stops outside the site. The site would therefore comply with NEW Core Policy DCP1 in respect of being located on a site that would minimise the need to travel.
- 3.33 Tritax Symmetry are dedicated to being an environmentally responsible business and adopt a holistic approach to creating energy efficient buildings. New development on the site would "be constructed to achieve the highest viable energy efficiency and designed to maximise the delivery of decentralised renewable or low-carbon energy generation" (NEW Core Policy DCP1) in accordance with the policy framework.

### Core Policy CP2

- 3.34 The Policy commits to the provision of "at least 50 hectares of additional employment land to meet the needs of the District for the period 2020 to 2040"
- 3.35 As referenced above an Economic Needs Assessment for Stroud is being undertaken and until this has been completed the level of employment land requirement cannot be confirmed. The Economic Needs Assessment needs to consider the requirement for strategic scale employment sites to meet national and regional needs which includes large scale warehousing.
- 3.36 This Policy does not provide for strategic employment sites and only allocates sites of small to medium scale (5 – 10 hectares), which are not suitable for national or regional warehouse development. As stated above the average size of warehouse required by the sector is 266,000 square feet (Savills Data, 2019), and none of the sites proposed for employment in the Draft Plan are large enough to accommodate this scale of development. Symmetry Park, Gloucester West is of a scale large enough to accommodate large scale warehouses and therefore should be allocated for strategic employment development in the Local Plan.
- 3.37 Furthermore, strategic employment sites need to be large in scale and flat in topography in order to accommodate large scale warehouses and need to be located in highly accessible locations. These sites are rare and therefore Symmetry Park, Gloucester West which meets these requirements should be allocated for strategic employment use to meet national and/or regional employment need.
- 3.38 We therefore propose that the table contained within Draft Policy CP2 should be amended as follows to include the allocation of Symmetry Park, Gloucester West and East:

Strategic Sites	Hectares at each
Quedgeley East Extension	5

Javelin Park	9
Sharpness Docks	7
Sharpness	10
Stonehouse North West	5
Stonehouse Eco-Park (M5,J13)	10
Wisloe	5
Renishaw New Mills	10
<u>Symmetry Park, Gloucester West</u>	<u>27</u>
<u>Symmetry Park, Gloucester East</u>	<u>21</u>
	<u>64 109ha</u>

(Table 1 – Proposed Amendment to Draft Policy CP2 – Table 5)

### Core Policy CP3

- 3.39 We support Hunts Grove designation as a Tier 2 Settlement and Hardwicke is designated a Tier 3 Settlement. Allocating Symmetry Park, Gloucester West for strategic employment development will strengthen these settlement designations as a wider range of employment opportunities will be available to the residents living in these settlements. Furthermore, the allocation Symmetry Park, Gloucester 2 will meet the overriding aim of the Settlement Hierarchy which is to “*ensure that development reduces the need to travel and promotes sustainable communities*” (Draft Core Policy CP3)

## Making Places – Shaping the future of Stroud District

### Making Places - Shaping the future of Gloucester’s rural fringe

- 3.40 We are supportive that the Draft Vision 2040, “*Growing a sustainable community at Hunts Grove and preserving Gloucester’s rural hinterland...*,” continues to recognise that employment development to the east of the M5 is appropriate.
- 3.41 Gloucester’s rural fringe occupies a strategic position on the M5 corridor and therefore it is correct that the Vision recognises that the area will continue to be an important employment focus for the District as the area is highly accessible. This approach is in accordance with the GFirst LEP Draft Local Industrial Strategy which states that “*The M5 spine is a focus for growth in Gloucestershire and beyond*”.
- 3.42 The Vision recognises that the “*Waste Incinerator has marked the landscape*”.
- 3.43 The Vision for Hunts Grove to “*grow into a sustainable community .... Providing easy and convenient access to nearby jobs*” is supported, however, to ensure this vision is realised, a variety of employment opportunities in close proximity of Hunts Grove need to be made available to the local residents.

## The Gloucester fringe – Our towns and villages ... Hardwicke and Hunts Grove

### Draft Site Allocation PS43 Javelin Park

- 3.44 Proposed site allocation PS43 designates 9 hectares of the land south of the Gloucestershire Energy from Waste for employment development. The land available expands to 27 hectares

which we propose is allocated in its entirety in the Draft Plan. A site of 27 hectares provides a sufficient amount of land for the large-scale modern warehouses. As stated above, the average size of warehouse required by the logistics sector is 266,000 square feet (Savills Data, 2019), and currently the Draft Plan does not propose any sites large enough to accommodate this scale of warehouse.

3.45 The draft site allocation states:

*“Detailed policy criteria will be developed where necessary to highlight specific mitigation measures and infrastructure requirements. A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and coordinated manner.”*

3.46 We ask that we are consulted on the detailed policy criteria to ensure collaborative working between the Local Authority and the developer and that the policy criteria is appropriate and, ultimately, ensure that the site can be delivered.

### Hardwicke and Hunts Grove Strategic Housing Development

3.47 When considering the housing allocations in the adopted Local Plan and the Draft Plan it is proposed that 3,700 homes are built on the south east fringe of Gloucester (see table below)

Residential Sites	Number of Dwellings	Status
Hunts Grove	1,750	Local Plan 2005 Allocation SA 476 complete 139 under construction <small>(Source: Stroud District Five Year Housing Land Supply, August 2019)</small>
Hunts Grove Extension	750	Adopted Local Plan 2015 Allocation SA4
South of Hardwicke	1,200	Local Plan Review Proposed for Allocation G1
<b>Total</b>	<b>3,700</b>	

(Table 2 – Committed and Proposed Strategic Housing Allocations)

3.48 The Draft Plan states *“The Hardwicke area has an important employment role: with three key employment sites nearby, this is one of the District’s employment hubs. However, the principal role of the settlement itself is as a ‘dormitory’ for its large working population.”*

3.49 A key opportunity for the allocation of Hardwicke identified in the Stroud Sustainable Transport Strategy – Draft is that Hardwicke is *“Located close to large areas of employment such as Quedgeley East Business Park”* (now known as St Modwen Park, Gloucester).

3.50 It is important that the residents of Hardwicke and Hunts Grove have a choice of employment in the local area to ensure that the settlements remain sustainable and do not act as a dormitory to motorway commuters as a result of the close proximity to junction 12 of the M5. This is a key issue identified in the Stroud Sustainable Transport Strategy – Draft in relation to the proposed allocation South of Hardwicke. The Draft Plan at present does not provide sites for strategic employment use and is neglecting the opportunity for providing a diverse range of jobs and redressing the existing out-commuting issues.



- 
- 3.51 We propose that the land west of Gloucester Road (Symmetry Park, Gloucester West) is allocated in its entirety (27 hectares) for strategic employment development to accommodate the high demand for modern warehousing solutions and provide a diverse range of employment opportunities for the local and highly skilled workforce.

---

## 4 CONCLUSION

- 4.1 We support the Council's Strategy to focus strategic housing and employment growth within the Gloucester Fringe and specifically focus employment growth around junction 12 of the M5. Clustering housing and employment development is a sustainable approach and meets the primary aim of the Council's development strategy to minimise the need to travel and promote sustainable communities.
- 4.2 Although the Draft Plan references the allocation of strategic employment sites, we do not consider that the Draft Plan allocates any sites appropriate for strategic employment development capable of meeting nationally and/or regional needs of modern logistics occupiers. The employment sites proposed for allocation in the Draft Plan are small to medium scale and would not be of appropriate scale to accommodate large scale strategic employment such as storage and distribution facilities. This is contrary to paragraph 82 of the NPPF.
- 4.3 Modern warehousing facilities (storage and distribution) have very specific locational requirements which comprise large scale sites with a flat topography and with excellent accessibility.
- 4.4 The land to the west of Gloucester Road should be allocated in the Local Plan. The land meets the requirements of the storage and distribution industry and has the following qualities:
- Located within close proximity of junction 12 of the M5,
  - Adjacent to Gloucestershire Energy from Waste and Gloucester 12, and within close proximity of St Modwen Park, Gloucester which has urbanised the landscape,
  - The site is large in scale and extends to 27 hectares,
  - The site is flat in topography,
  - The land is environmentally unconstrained,
  - The site is accessible via an existing frequent bus service between Gloucester and Stroud, and
  - Located within the area designated for Strategic Employment Development in the Adopted and Draft Local Plan.
- 4.5 The development of employment uses including regional scale modern warehousing on the site would provide approximately 1,415 jobs<sup>1</sup> for the local area.

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<sup>1</sup>job numbers based on Employment Density Guide Matrix (3rd Edition – November 2015)

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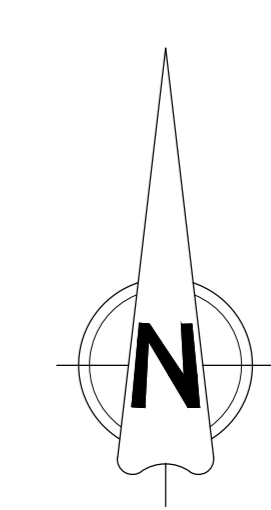
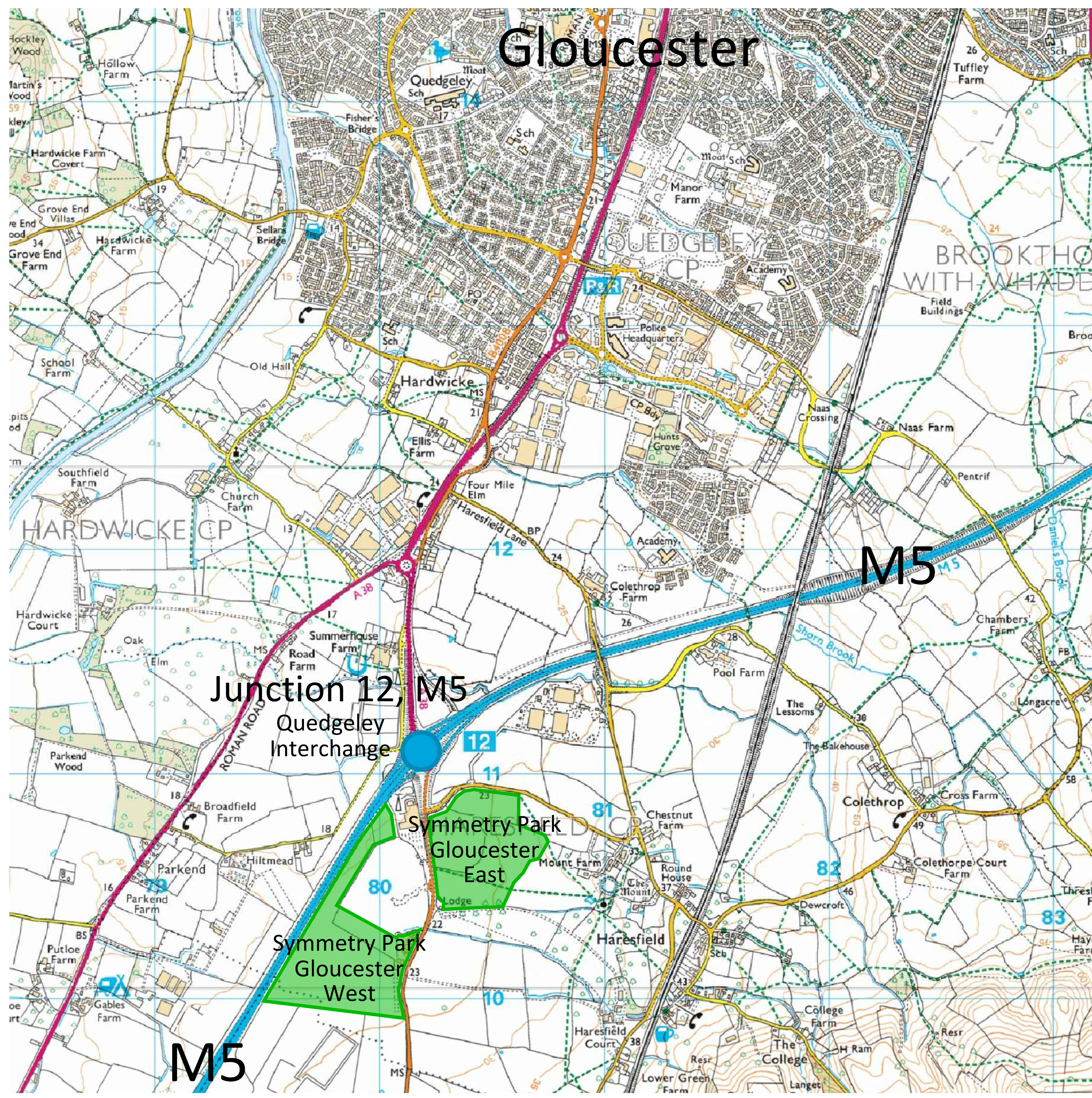
**APPENDICES**

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# Appendix 1

## Site Location Plan

Notes  
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**TRITAX SYMMETRY**  
A TRITAX BIG BOX COMPANY

project  
Symmetry Park  
Junction 12, M5  
Gloucester

drawing  
Site Location Plan

scale NTS drawn mjl  
checked mjl date 14/1/20

no.  
6440 - 12

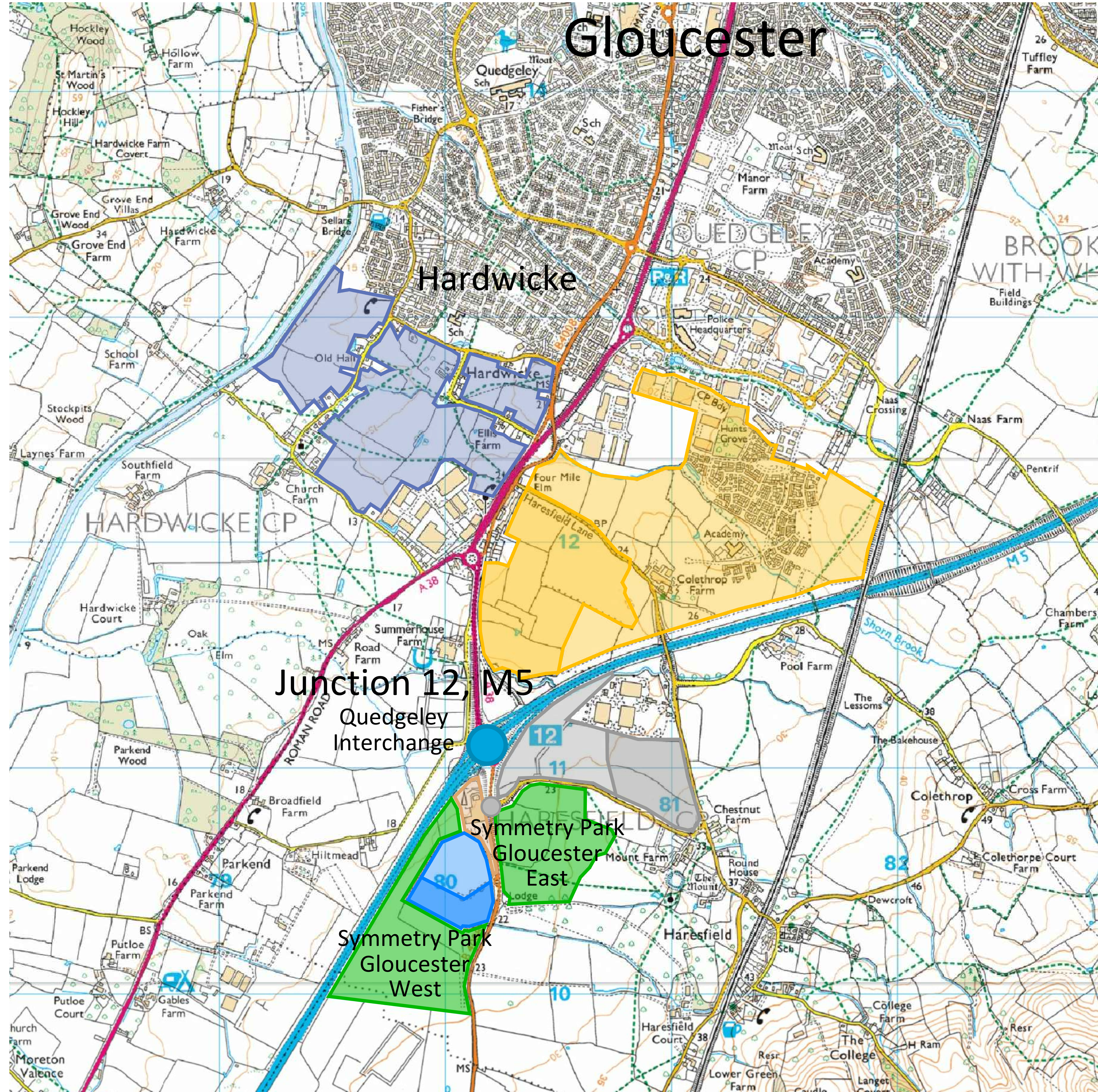
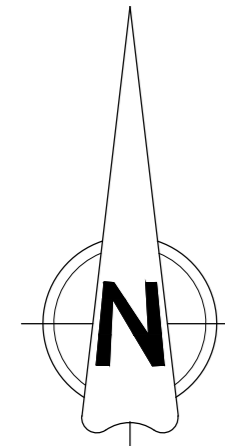
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# Appendix 2

## Site Context Plan

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# Gloucester



## Legend

- Symmetry Park, Gloucester East and West
- Proposed Strategic Housing Allocation (South of Hardwicke)
- Hunts Grove Strategic Housing Allocation
- Hunts Grove Extension, Strategic Housing Allocation
- St Modwen Park, Gloucester
- St Modwen Park, Gloucester Extension
- Gloucester 12
- Gloucestershire Energy from Waste
- Dobbies Garden Centre
- Junction 12, M5
- Stonehouse Junction

no. date revision by

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**TRITAX SYMMETRY**  
 A TRITAX BIG BOX COMPANY

project  
 Symmetry Park  
 Junction 12, M5  
 Gloucester

drawing  
 Context Illustration

scale N1S drawn mjl  
 checked mjl date 14/1/20

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# Appendix 3

## Vision Document





**TRITAX SYMMETRY**

A TRITAX BIG BOX COMPANY

Symmetry Park, Gloucester  
**Vision Document**

January 2020

# Executive Summary

The demand for modern warehouse space is ever increasing. As more homes are built, the demand for goods increases. Underpinning the logistics sector is the requirement for modern warehouse space.

**Symmetry Park, Gloucester East and West** should be allocated in the Stroud Local Plan for large scale strategic employment development to meet the needs of Stroud, Gloucester and the wider Gloucestershire region. The sites in combination could accommodate up to 2 million square feet of modern warehouse space. The sites are suitable for the development of large scale strategic warehouses and would meet the needs of the sector which has an average unit size of 266,000 square feet (Savills Data, 2019). This scale of employment development is not currently provided for in the Draft Stroud District Local Plan.

- **Symmetry Park, Gloucester East and West** are strategically positioned within close proximity at Junction 12 of the M5
- The sites are within an area designated by the Adopted and Draft Stroud District Local Plan for Strategic Employment Development
- The sites are immediately adjacent to the Gloucestershire Energy from Waste, Gloucester 12 and St Modwen Park, Gloucester in an urbanised setting
- The sites provide a logical extension to existing employment sites for the development of modern warehousing for the logistics sector
- The sites are sustainably located on the fringe of Gloucester City, accessible via sustainable modes of transport and close to a large local and highly skilled workforce
- The development of modern warehousing on the sites would provide 2,479\* jobs for local people
- The development would provide a diverse range of employment opportunities a significant proportion of which would be office based, IT and engineering based roles.

- Land Portfolio of 2,900 acres, capable of accommodating 41 million square feet of B8 logistics space

- Spec Build programme of units between 55,000 square feet – 333,000 square feet

- End of development value of £3 billion

- Tritax Symmetry is owned by Tritax Big Box REIT (TBBR) a FTSE 250 company

- Gold leaf members of the UK Green Building Council.

 **TRITAX SYMMETRY**  
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\* job numbers based on Employment Density Guide Matrix (3rd Edition – November 2015)

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2. The Sites & Context	2
3. Planning Policy Context	4
4. The Need for Development	9
5. Opportunities and Constraints	10
6. Sustainable Strategic Development	14
7. Deliverability & Tritax Experience	15
8. Conclusion	21

“Logistics should be a central consideration when planning for sustainable communities”

(What Warehousing Where, British Property Federation, March 2019)





# 1. Introduction & Vision

This Vision Document has been prepared by RPS Consulting Services Ltd ('RPS') on behalf of our Client Tritax Symmetry. The purpose of the document is to set out our Vision for sustainable strategic employment development on two parcels of land; **Land West of Gloucester Road and Land East of Gloucester Road**.

Our Vision for the site has been informed by an experienced consultant team including RPS on Town Planning, the Environmental Dimension Partnership (EDP) on Ecology, Landscape and Heritage, and AJA Architects.



## The Vision

To provide high quality modern logistic and warehouse space on the south east fringe of Gloucester which will deliver a wider choice of jobs for local people in a sustainably accessible location. The development will meet the increasing demand and requirements of the logistics sector in Gloucestershire and will be set within a strong landscape setting.

## 2. The Sites & Context

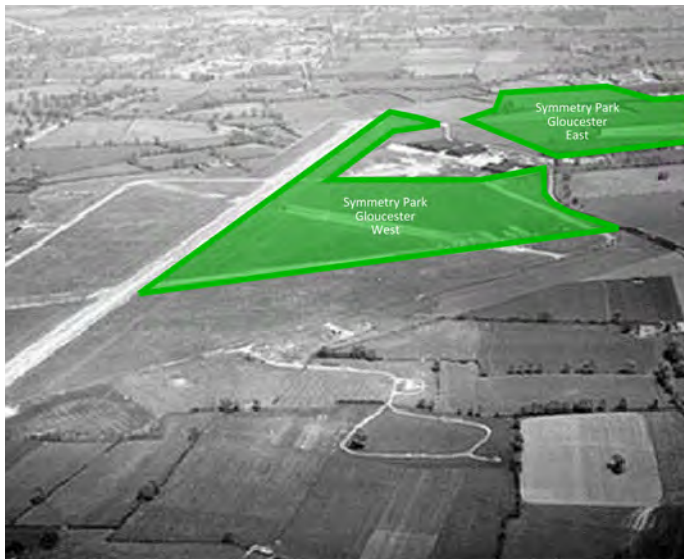
The parcels of land to the west and east of Gloucester Road are located in Stroud District, Gloucestershire.

Gloucestershire has a strategic position in the UK located at a crossroad between Wales and London, and the West Midlands and the South West.

The sites are located on land surrounding **Quedgeley Interchange**, where Junction 12 of the M5 intersects the B4008. "The M5 spine is a focus for growth in Gloucestershire and beyond" (GFirst LEP Draft Local Industrial Strategy 2019, page 16).

The landscape around Junction 12 is dominated by the large scale Gloucestershire Energy from Waste and the various employment uses including Gloucester 12 and St Modwen Park, Gloucester.

The site formed part of the RAF Moreton Valence Airfield (Haresfield Airfield), a Second World War military airfield which opened in 1939 and closed in 1962 (see image below). During the Second World War it was equipped with three concrete runways and a range of aircraft hangars. (*Pastscape, Historic England*)



RAF Moreton Valence Airfield (Haresfield Airfield)  
(Source : <https://www.ubbgloucestershire.co.uk/the-design>)

Gloucestershire Energy from Waste

Site Plan

## Symmetry Park, Gloucester West

The site is approximately 27 hectares in size. Approximately 9 hectares of the site is proposed for allocation in the Draft Plan (Draft Plan Site Reference PS43).

The site comprises two fields, the larger southern field being arable land and the small northern field supporting species poor semi-improved grassland. The site formed part of RAF Moreton Valence (Haresfield), which was a Second World War Airfield and closed in 1962.

The site is located within an area adjacent to junction 12 of the M5 that has been urbanised by existing industrial and employment development.

The site surrounds the Gloucestershire Energy from Waste and Gloucester 12 Employment Site (formerly known as Javelin Park Distribution Centre). The land known as Gloucester 12 is currently subject to a planning application for the development of four buildings (5 units) of B1, B2 and B8 employment use (Reference - S.19/2135/FUL).

St Modwen Park, Gloucester (formerly Quedgeley East Business Park) is located approximately 800 metres to the north. The site formed part of RAF Moreton Valence (Haresfield Airfield), which was a Second World War Airfield and closed in 1962.

The site comprises two fields and the former construction compound for the Gloucestershire Energy from Waste. To the south of the former compound is an artificial bund created as part of the Gloucestershire Energy from Waste, the bund does not provide a natural defensible boundary.

The site is bound to the west by the M5.

The site is highly accessible being located approximately 1.2 kilometres by road from junction 12 of the M5. The site would be accessed from an new roundabout on the B4008 which is proposed as part of this development.

## Symmetry Park, Gloucester East

The site is approximately 21 hectares in size.

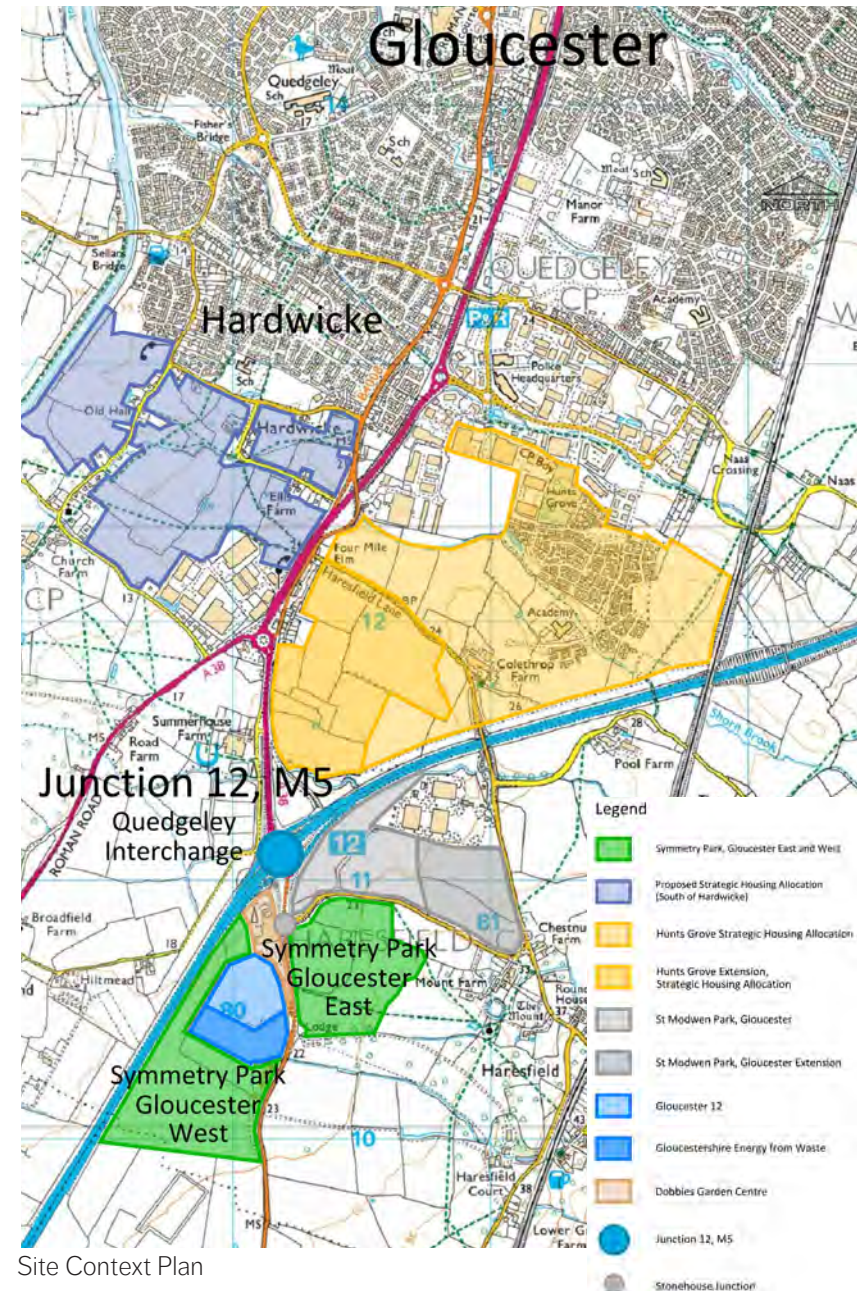
The site is not currently proposed for allocation in the Draft Plan, however we consider that the site could provide a logical solution for meeting the strategic employment needs of Stroud and the wider region, and therefore should be considered for the allocation for strategic employment development.

The site is located within an area adjacent to junction 12 of the M5 which has been urbanised by existing industrial and employment development.

The site is located immediately south of St Modwen Park, Gloucester (formerly Quedgeley East Business Park) which benefits from planning consent for B1, B2 and B8 employment use (S.16/1724/OUT). A 5 hectare extension to St Modwen Park, Gloucester is proposed in the Draft Plan (Reference PS32 South of M5/J12).

The Gloucestershire Energy from Waste and Gloucester 12 Employment Site is located west of the site.

The site is highly accessible being located approximately 300 metres from junction 12. The site would be accessed from the existing roundabout which serves the Gloucestershire Energy from Waste and Gloucester 12.



Site Context Plan

# 3. Planning Policy Context

## Existing Local Plan

Stroud District Local Plan (the Local Plan) was adopted on 19th November 2015 and provided a planning policy framework for the period up to 2031. The 2015 Local Plan completely replaced the 2005 Local Plan.

Symmetry Park, Gloucester West and East is currently designated as Countryside by Core Policy CP15 - A Quality Living and Working Countryside. The sites are outside of the identified settlement development limits and development will only be permitted under certain exceptions set out in Policy CP15.



## Strategic Growth and Development Locations

The Local Plan Core Policy CP2 - Strategic growth and development locations, sets out that Stroud District will accommodate **“58 hectares of additional employment land for the period 2006-2031”** (The Local Plan 2015, Core Policy CP2).

Policy CP2 identifies strategic sites for employment at the following locations:

Location	Employment	Housing
Hunts Grove Extension		750
Quedgeley East	13ha	
North East Cam	12ha	450
Sharpness	17ha	300
Stroud Valleys	Intensification	450
West of Stonehouse	10ha	1,350

The Local Plan does not provide for meeting the unmet employment needs of neighbouring authorities. However, Policy CP2 sets out a commitment for Stroud District Council to *“give due consideration to the need to assist other local planning authorities in this housing market area in meeting their unmet objectively assessed development and infrastructure needs, including through an early review of this Local Plan, to ensure that any shortfalls that may arise in the delivery of housing and employment growth (as identified through the other authority’s local plan process) are provided for in sustainable locations.”* (The Local Plan 2015, Core Policy CP2).

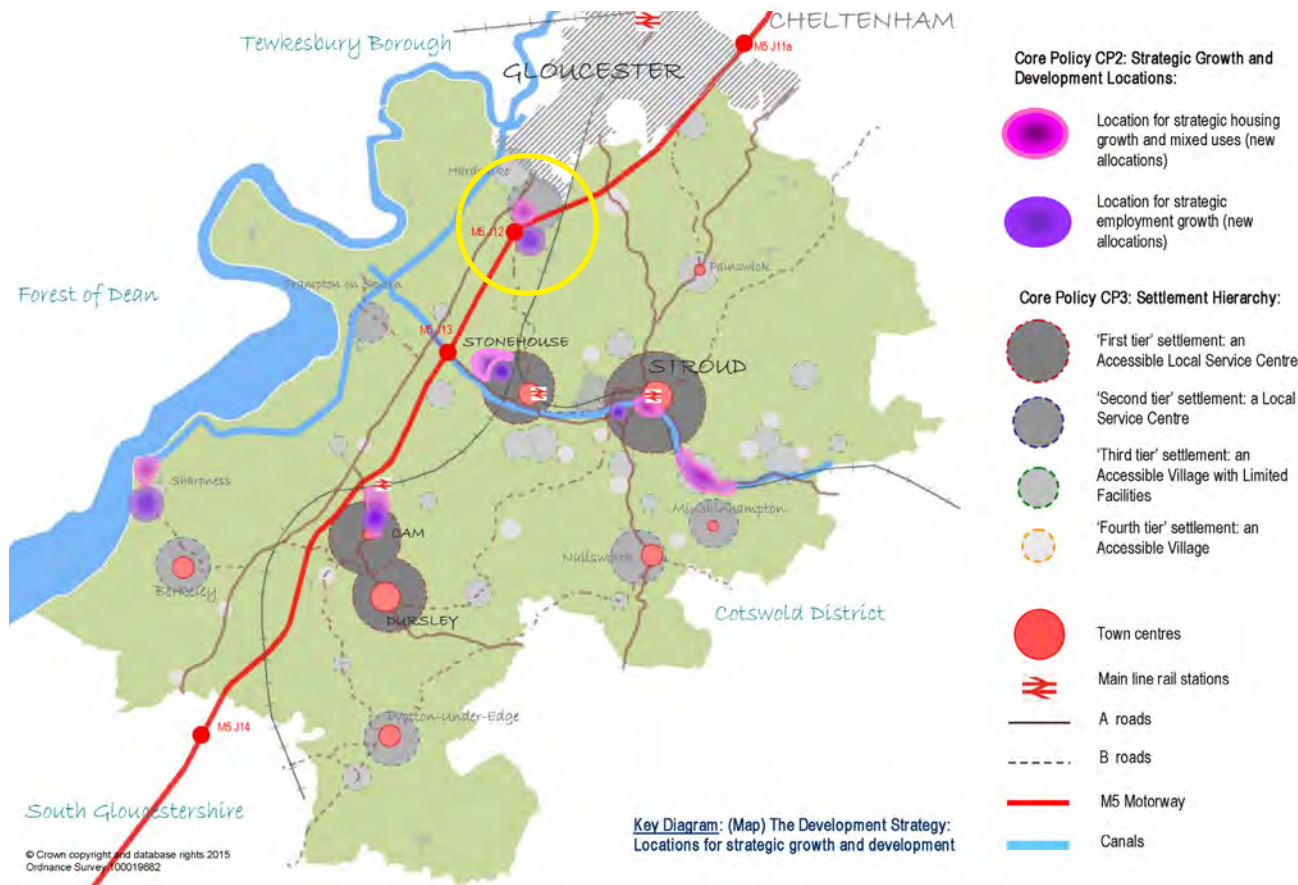
The Inspector endorsed the approach for Stroud to consider other Local Authorities needs through a Local Plan Review during his Examination of the Local Plan in 2015, where he stated that in order to make the plan sound the Council should,

*“Amend the commitment to Policy CP2 to an early review of the Plan commencing within five years of adoption or by December 2019, whichever is the sooner, and recognise the possibility of considering the need to assist other local planning authorities in the housing market area in meeting their future unmet objectively assessed development and infrastructure needs”* (Non-technical summary, Inspectors Report – Stroud Local Plan, November 2015).



The Core Policy CP2 Diagram identifies that the land to the south east of Junction 12 of the M5 is designated for strategic employment development, whilst land to the north east of the junction is designated for strategic

housing growth and mixed use. This cluster approach for locating strategic housing and employment within close proximity to one another is closely aligned with the aims of the Settlement Hierarchy as outlined below.



### Settlement Hierarchy

Core Policy CP3 sets out the Districts Settlement Hierarchy, where settlements have been ranked on their size and range of facilities, which enables decisions to be taken on appropriate development for each settlement. The primary aim of Stroud's Settlement Hierarchy is to reduce the need to travel through promoting sustainable communities based on the jobs and facilities available in each settlement.

Hunts Grove, which is now partially completed, is the strategic housing allocation north east of the M5 and is classed as a **Second Tier Settlement - Local Service Centres**.

**"Local Service Centres – Second Tier Berkeley, Frampton on Severn, Hunts Grove (anticipated) Minchinhampton, Nailsworth, Wotton Under Edge.**

*These market towns, large villages and planned urban extension have the ability to support sustainable patterns of living in the District because of their current levels of facilities, services and employment opportunities. They have the potential to provide for modest levels of jobs and homes in order to help sustain and, where necessary, enhance their services and facilities, promoting better levels of self-containment and viable, sustainable communities."* (Local Plan, Core Policy CP3)

Hardwicke which is located immediately north west of Hunts Grove is classed as a **Third Tier Settlement – Accessible settlement with limited services**.

The Local Plan 2015 – Key Diagram: (Map) The Development Strategy: Locations for strategic growth and development

# 3. Planning Policy Context (cont..)

## Local Plan Review (LPR)

A review of the Local Plan commenced in Autumn 2017 with a consultation on the Issues and Options. The Emerging Strategy consultation followed from 16th November 2018 until 18th January 2019.

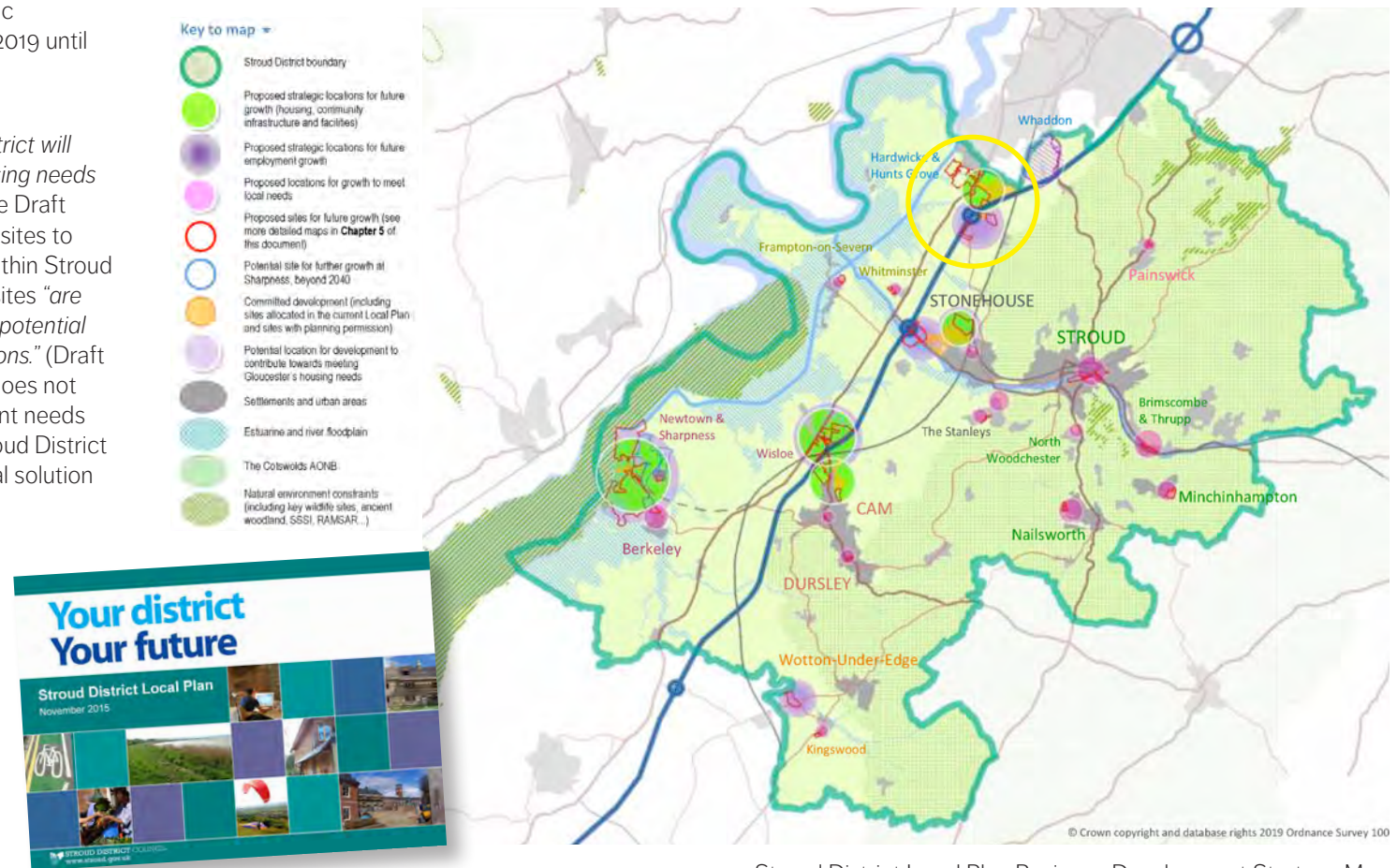
The Draft Plan is now currently subject to public consultation which runs from 20th November 2019 until 22nd January 2020.

Draft Core Policy CP2 – Strategic growth and development locations, states that “*Stroud District will make a contribution to meeting the unmet housing needs of Gloucester City*” (Draft Core Policy CP2). The Draft Plan identifies the rationale behind developing sites to meet Gloucester’s long-term housing needs within Stroud District but on the Gloucester fringe as these sites “*are functionally related to Gloucester and offer the potential to meet Gloucester’s needs in accessible locations.*” (Draft Plan, Paragraph 2.31) However the Draft Plan does not identify that this is also the case for employment needs and the plan should recognise that sites in Stroud District on the edge of Gloucester can provide a logical solution to meeting the employment needs of the City.

The principal of locating strategic employment development around the M5 is supported by the Draft Development Strategy which states that “*further strategic employment growth will also be concentrated at accessible locations within the A38/M5 corridor.*” (Paragraph 2.14, Draft Plan 2019).

The primary aims of the Settlement Hierarchy in the Draft Plan remains the same as the adopted Local Plan whereby development will be in locations that reduce the need to travel and aid the promotion of sustainable communities. The Development Strategy Map in the Draft

Plan continues with the cluster approach for strategic housing development to the north east of junction 12 of the M5 and strategic employment development to the south east of the junction.



Stroud District Local Plan Review – Development Strategy Map

When considering the housing allocations in the adopted Local Plan and the Draft Plan, it is proposed that 3,700 homes are built on the south east fringe of Gloucester (see table below)

Residential Sites	Number of Dwellings	Status
Hunts Grove	1,750	Local Plan 2005 Allocation SA 476 complete 139 under construction (Source: Stroud District Five Year Housing Land Supply, August 2019)
Hunts Grove Extension	750	Adopted Local Plan 2015 Allocation SA4
South of Hardwicke	1,200	Local Plan Review Proposed for Allocation G1
Total	3,700	

The Draft Plan states

***“The Hardwicke area has an important employment role: with three key employment sites nearby, this is one of the District’s employment hubs. However, the principal role of the settlement itself is as a ‘dormitory’ for its large working population.”***

A key opportunity for the allocation of Hardwicke identified in the Stroud Sustainable Transport Strategy – Draft is the site is ***“Located close to large areas of employment such as Quedgeley East Business Park.”***

It is important that the residents of Hardwicke and Hunts Grove have a choice of employment in the local area to ensure that the settlements are sustainable and do not act as a dormitory to motorway commuters as a result of the close proximity to junction 12 of the M5. This is a key issue identified in the Stroud Sustainable Transport Strategy – Draft in relation to the proposed allocation

South of Hardwicke. At present the Draft Plan does not provide sites for large scale strategic employment use.

## National Policy

Since the adoption of the Local Plan in 2015, the National Planning Policy Framework (NPPF) has been updated in February 2019.

### Maintaining effective cooperation

Aligned with Policy CP2 of the Local Plan, paragraphs 25 and 26 of the NPPF require strategic policy making authorities to maintain effective cooperation and joint working with each other and other relevant bodies in order to determine whether there are an unmet development needs within a particular area that could be met elsewhere. This includes housing, employment and other infrastructure requirements.

To demonstrate this effective cooperation paragraph 27 of the NPPF requires authorities to establish statements of common ground which set out the cross-boundary matters that are being addressed and how these matters are being addressed.

### Building a strong, competitive economy

The Government states

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt”* (Paragraph 80, NPPF)

The NPPF at Paragraph 82 is clear that *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors”*

*“This includes making provision ... for storage and distribution operations at a variety of scales and in suitably accessible locations.”*

The Planning Policy Guidance (PPG) sets out clearer guideline for Local Planning Authorities with regards to allocating space for logistics and warehousing.

***1.1.1 “How can authorities assess need and allocate space for logistics? The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).***

*Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. This can be informed by:*

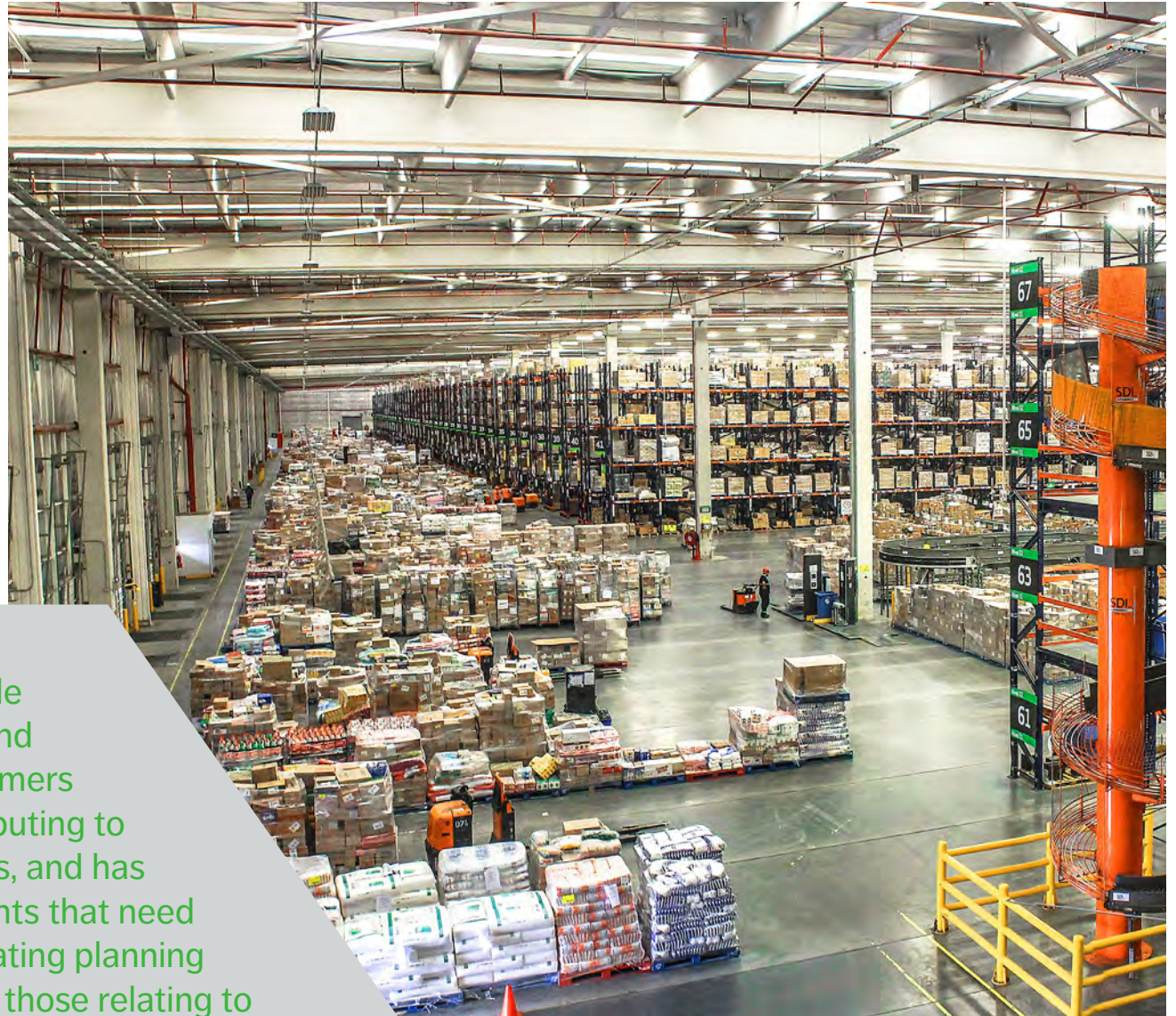
- *engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;*
- *analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;*
- *analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and*

### 3. Planning Policy Context (cont..)

- engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies.

Strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones).

Authorities will also need to assess the extent to which land and policy support is required for other forms of logistics requirements, including the needs of SMEs and of 'last mile' facilities serving local markets. A range of up-to-date evidence may have to be considered in establishing the appropriate amount, type and location of provision, including market signals, anticipated changes in the local population and the housing stock as well as the local business base and infrastructure availability." (Planning Policy Guidance, Paragraph: 031 Reference ID: 2a-031-20190722, Revision date: 22 07 2019).



**‘The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)’**

(What Warehousing Where, British Property Federation, March 2019)

## 4. The Need for Development

The logistics sector is an integral part of modern life, ultimately comprising of goods being moved from one location to another, ending up with a consumer.

Warehouse storage space is required to support the logistics sector, and as the sector continues to change and grow so does the demand for warehousing.

As set out in the British Property Federation (BPF) report 'What Warehousing Where?', "Households generate demand for goods of all types, from cars to carpets to coffee to clothes" As more homes are built, 12,800 new homes proposed in Stroud up to 2040, and the Government's annual target of 300,000 new homes a year, the requirement for warehouse space will continue to grow exponentially.

"What Warehousing Where" sets out that 69 square feet of warehousing space is required for every new dwelling built. This figure is based on the 1.64 billion square feet of warehouse space divided by 24 million homes (Turley analysis of MHCLG and CoStar data, 2018 (2017 data).

**"The nature of the logistics sector has changed. Warehousing is no longer simply about the storage of product but is now focused on delivering complex supply chain solutions and accommodating all business functions under one roof. Logistics has evolved to encompass a far wider range of occupiers and employment opportunities than ever before. It encompasses every aspect of our daily lives and is an essential part of the infrastructure underpinning all other sectors of the economy."** (Tritax Symmetry)

Warehousing and logistic has very specific site locational requirements, which essentially are large, flat sites able to accommodate large warehouses and easily accessible by road. Such sites are quite rare. The NPPF at paragraph 82 identifies that policies should recognise and address the specific locational requirements of employment developments including that of storage and distribution (warehousing/logistics) which need to be in suitably accessible locations.

The average size of warehouse required by the logistics sector is 266,000 square feet (Savills Data, 2019), and currently the Draft Plan does not propose any sites large enough to accommodate this scale of warehouse.

The development of Hunts Grove and Hardwicke Strategic Housing Sites are going to result in an increase to the local workforce requiring a range of jobs.

*"The latest job forecasts for the District suggest the need to plan for between 2,300 and 6,300 net new jobs (2020-2040)".* (Draft Plan, paragraph 2.52)

Occupiers of logistics building are very diverse and provide a very diverse range of employment opportunities a significant proportion of which would be office based, IT and engineering based roles. In line with guidance contained in the Government's Employment Densities guide the employment development on Symmetry Park West and East would create 2479 jobs\*.



\* job numbers based on Employment Density Guide Matrix (3rd Edition - November 2015)

# 5. Opportunities & Constraints

## Symmetry Park, Gloucester West

### Landscape

The site does not lie within any nationally or locally designated landscape and is currently used for arable farming. There is no Public Rights of Way (PRoW) within the site.

The site lies within approximately 1.1km of the Cotswolds Area of Outstanding Natural Beauty (AONB) and has the potential to form part of its setting. However, given the location of the site and its proximity to existing large-scale development, including the Gloucestershire Energy from Waste and Gloucester 12 Employment Site, the M5 junction and corridor, Dobbies Garden Centre with associated lighting sources, there are unlikely to be any significant effects to the setting of the Cotswolds AONB. Both the Secretary of State and Inspector Brian Cook, regarding the planning appeal in of the “Energy from Waste” facility (APP/T/A13/2200210) agreed in paragraphs 28-30 of the report, that views towards the Cotswolds AONB and expansive views out from it

together with the setting of the AONB would not be conflicted and it is considered that the same would be true for Symmetry Park, Gloucester West. The effects of developing the site on views towards the escarpment would be localised, availability of views from the AONB of the site would be very limited by the wooded nature of the escarpment and industrial/commercial development and transport infrastructure are key characteristics of the Vale landscape within which it lies.

The Local Character Assessment (January 2006) identifies the site as falling within Landscape Character Type (LCT) 18: ‘Settled Unwooded Vale’ and Landscape Character Area (LCA) SV6A: ‘Vale of Berkeley’. This LCA is described as an open, gently undulating landscape broadly bounded by the rising landform of the Cotswolds escarpment to the east and by the flat, low-lying floodplain landscape of the River Severn to the west. Whilst the site is broadly consistent with the character of the wider LCA there are many urbanising factors that serve to lessen the inherent sensitivity of the site to further development; namely the large adjacent Gloucestershire Energy from Waste, which

has a building 48 metres in height and the flue measures 70 metres in height, Dobbies Garden Centre and car park and the adjacent main road infrastructure of the M5 Motorway and B4008. These features ‘urbanise’ the site and its immediate locale and differentiate it from the more intact rural landscapes elsewhere in the area. Furthermore, landscape features such as mature boundary trees within hedgerows are less frequent in comparison to surrounding areas, given the former airfield use.

An artificial bund spans the southern extent of the site, which has informed the boundary of the PS43 site allocation in the Draft Plan. However, the bund does not in any way provide a strong landscape feature, and whilst landscape enhancements can be achieved on the draft site allocation (Draft Plan Reference PS43) , there is a greater opportunity to incorporate more meaningful structural landscaping and green infrastructure if the full site area (27 hectares) were to be allocated for employment use, and offers the additional opportunity to deliver landscape character improvements in the vicinity of the Gloucestershire Energy from Waste and the Gloucester 12 Employment Site.

### Ecology

An Extended Phase 1 Ecological Survey was carried out on 10 January 2020 by EDP.

The site does not have any ecological statutory or non-statutory designations.

The site comprises two fields, the larger southern field being arable land that has been planted with ryegrass and the small northern field supporting species poor semi-improved grassland. The eastern boundary consists of a species poor intact hedgerow with trees that had been box cut. The southern boundary consists of bramble



Gloucestershire Energy from Waste

scrub with trees that have been box cut. To the west of the site is a fence line behind which are mature trees and scrub patches, with the M5 motorway beyond. Within the east of the southern field is a large area of bramble scrub containing clearings of tall ruderal. The south east of the site has a hardstanding track which leads further north to an area of bare ground that has been used during the construction of the Gloucestershire Energy from Waste. There is a pond located 60m north of the site and no other ponds within 250m.

The Ecological Appraisal undertaken by EDP considers the habitats on site are low in their intrinsic value and are unlikely to support either unique or exceptional species populations, and consequently, there are no significant ecological constraints posed by habitats on-site.

Given the low intrinsic value of the habitats present, allocation of the whole site (27 hectares) gives a greater opportunity to deliver a meaningful biodiversity gains.

### Heritage & Archaeology

The site contains no designated heritage assets.

The closest designated heritage asset is located c.220m to the west but separated from the site by the M5 and comprises a Grade II listed house (Hiltmead). 800m to the east are a number of highly graded designated heritage assets within the settlement of Haresfield, which include 'The Mount' moated site which is a nationally important scheduled monument, and the Grade II\* Church of St Peter.

Both the draft allocation (Draft Plan Reference PS43) and the site as a whole have the potential to form part of the setting of all or at least many of these designated assets. However, EDP's initial assessment suggests, that whilst this may be the case, it is not considered that development

within either the draft allocation or the wider site would cause a change within the setting of these assets such that their significance would be negatively affected. This assessment is in agreement with the council's own assessment for site HFD 012 (Site A), within the SALA New Sites Update Report (Stroud District Council November 2019), which states that: *"An initial desktop heritage assessment of the site has indicated that there is potential to develop this site without harm to a designated heritage asset"*.

Based on a preliminary assessment of the archaeological potential of the site, it is considered that the site is highly unlikely to contain features of anything other than local significance, should these survive and the site as originally assessed by the Council will have no greater effect on any non-designated assets than the currently identified draft allocation PS43. Additional features relating to the former airfield on the site may be encountered but this will not restrict its development.

### Highways & Access

The site is located approximately 1.2 kilometres from junction 12. The site would be accessed from a new

roundabout proposed as part of this development on the B4008.

The number 64 bus service between Gloucester and Stroud stops close to the entrance to the Gloucestershire Energy from Waste Gloucester 12 approximately every 30 minutes during the day (Monday to Saturday) with a less frequent service on a Sunday.

### Flood risk from rivers or the sea

The Government flood map indicates that the majority of the site has a very low risk of flooding which means that each year the area has a 0.1% chance of flooding. A small section of the site to the west of the site has a low risk of flooding which means that each year the area has a 1% chance of flooding.

Sustainable Urban Drainage Systems (SuDS) would be implemented across the site to manage the surface water. Wherever possible SuDS features will be applied above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife.



View southbound M5

# 5. Opportunities & Constraints (cont..)

## Symmetry Park, Gloucester East

### Landscape

The site does not lie within any nationally or locally designated landscape and is currently used for arable farming. A Public Right of Way (PRoW) extends through the site (Reference. Haresfield FP 3).

The St Modwen Park Employment Site, Dobbies Garden Centre, Gloucestershire Energy from Waste and the M5 corridor itself between junction 12 and the railway corridor to the east all represent the urban nature of this landscape baseline.

The site lies within approximately 900m of the Cotswolds Area of Outstanding Natural Beauty (AONB) and has the potential to form part of its setting. However, given the location of the site and its proximity to existing large-scale industrial/commercial development, the M5 with associated lighting and noise impacts, effects of development on the site on views towards the escarpment would be localised and availability of views from the AONB very limited. This was reflected in the findings of the appeal on the nearby Gloucestershire Energy from Waste (Paragraph 32 of Appeal Reference: APP/T1600/A/13/2200210). The Secretary of State agreed with the Inspector that the Javelin Park site was part of an urban fringe that had been present within and advancing in to the Vale of Berkeley landscape for 40 years and planned to continue in the future.

The Local Character Assessment (January 2006) identifies the site as falling within Landscape Character Type (LCT) 18: 'Settled Unwooded Vale' and Landscape Character Area (LCA) SV6A: 'Vale of Berkeley'. This LCA is described as an open, gently undulating landscape broadly bounded

by the rising landform of the Cotswolds escarpment to the east and by the flat, low-lying floodplain landscape of the River Severn to the west. Whilst the character of the site and adjacent villages has features that are typical of the Lowland Plain LCA, there are a number of opportunities to further develop that character through good design and reduce any adverse effects including

- Retention of better-quality hedgerows and hedgerow trees within areas of open space or alongside the existing public footpath to maintain a mature structure and coherent landscape fabric;
- Opportunity to develop the green infrastructure of the site, reinforcing hedgerow boundaries, connecting and creating habitats with tree and woodland planting, meadow grassland planting and creation of areas of amenity space.
- Careful consideration of building location and building heights across the site to reflect adjacent built scale at St Modwen Park, Gloucester (particularly areas to the east and in the vicinity of the Church of St Peter) to ensure development does not break skyline views of the escarpment and is complimentary with the existing character;
- Careful consideration with regard to colour and materials, in relation to the surrounding existing built form. The use of subtle colours and materials on the Gloucestershire Energy from Waste and St Modwen Park Gloucester development have been effective at blending the built form into the landscape and minimising visual effects particularly from long distance elevated locations;
- Tree planting within the site to continue the characteristic 'treed character' identified to the east.

This would take the form of tree belts in open spaces and a strong framework of street trees particularly on the B4008 frontage; and

- Integration of a sustainable urban drainage system (SuDS) into the design including swales and balancing areas to increase biodiversity opportunities.

### Ecology

An Extended Phase 1 Ecological Survey was carried out on 10 January 2020 by EDP.

The site does not have any ecological statutory or non-statutory designations.

The site comprises three large arable fields. The fields are bounded by species poor hedgerows and ditches. To the east of the site is a small block of deciduous woodland. Within the south western corner of the site is another small woodland block along with a residential property and garden. The southern boundary of the site consists of a line of mature horse chestnut trees with new planting to fill the gaps. There are mature trees scattered within the hedgerows of the site. A pond is located 100m north west of the site but there are no other ponds within 250m of the Site.

The Ecological Appraisal undertaken by EDP considers the habitats on-site are to be of only Site-level (low) intrinsic nature conservation value or less, being limited in distinctiveness, extent, botanical species richness or a combination. The arable land that constitutes the majority of the site is of negligible value. EDP considers that none of these on-site habitats/land uses represent significant ecological constraints that otherwise may preclude development. The habitats are likely to support some protected and Priority Species, however, the limited



intrinsic value of the habitats present will, in EDPs opinion, limit the value of such species populations/assemblages; they are likely to be of only Local-level value or less.

Given the low intrinsic value of the habitats present, the site gives an opportunity to deliver a net biodiversity gain.

### Heritage & Archaeology

The site contains no designated heritage assets.

The site is located to the west of the village of Haresfield; approximately 330m from the 'The Mount' moated site and designated scheduled monument and Grade II\* Church of St Peter. There are additional Grade II listed buildings within the settlement of Haresfield including the Thatched Cottage which is located c.350m from the site's eastern boundary.

The site has the potential to form part of the setting of these designated assets. However, an initial assessment of the site undertaken by EDP, informed by a site visit,

indicates that the site will only form part of the setting of those assets located in close proximity to it, and to a lesser degree those in the wider landscape. Depending on the nature and scale of the development, harm could arise to the significance of designated heritage assets particularly those that are closest to the site. However, in terms of the NPPF this harm could not be considered to be substantial, as there will be no physical harm to any designated heritage asset as a result of the development of the site.

Based on this preliminary assessment of the archaeological potential of the site, it's considered that the site is highly unlikely to contain features of anything other than local significance.

### Highways & Access

The site is located approximately 300 metres from junction 12. The site would be accessed from the existing roundabout which serves the Gloucestershire Energy from Waste and Gloucester 12.

The number 64 bus service between Gloucester and Stroud stops between the Garden Centre and the entrance to Gloucestershire Energy from Waste Gloucester 12 approximately every 30 minutes during the day (Monday to Saturday) with a less frequent service on a Sunday.

### Flood risk from rivers or the sea

The Government flood map indicates that the whole site has a very low risk of flooding which means that each year the area has a 0.1% chance of flooding.

Sustainable Urban Drainage Systems (SuDS) would be implemented across the site to manage the surface water. Wherever possible SuDS features will be applied above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife.



View M5 junction 12 exit slip road

# 6. Sustainable Strategic Development

## Development Benefits

### Meeting a regional need for modern warehouse space

Allocating these sites will meet the strategic employment needs of Stroud, Gloucester and the wider Gloucestershire region, therefore addressing cross boundary strategic matters and demonstrating effective cooperation.

### Providing sites which can accommodate large scale strategic warehouses

The sites could accommodate up to 2 million square feet of modern warehousing space and therefore could easily accommodate the average unit size of 266,000 square feet required for large scale warehouses (Savills Data, 2019)

### The development would create 2479\* jobs for local people

The modern warehousing sector provides a diverse range of employment opportunities a significant proportion of which would be office based, IT and engineering based roles.

### Located in a sustainably accessible location on the south east fringe of Gloucester

The sites are located close to the expanding south east fringe of Gloucester where strategic housing developments have been and are proposed.

### Located in a strategic location within close proximity of the national motorway network

The sites are highly accessible at Quedgeley Interchange close to Junction 12 of the M5, and therefore meet the specific locational requirements of the logistic and warehouse sector.



\* job number based on Employment Density Guide Matrix (3rd Edition – November 2015)

## 7. Deliverability & Tritax Experience

Tritax Symmetry is the Development Partner on both sites. The company comprise an experienced team who have been involved in some of the most dynamic and successful industrial and logistic development schemes

throughout the UK. Tritax Symmetry has a diverse development programme with buildings ranging from 55,000 square feet to 333,000 square feet.

The sites are available now and there are no insurmountable constraints to development coming forward, therefore development is fully deliverable.

### Project Examples

#### Central M40



# 7. Deliverability & Tritax Experience (cont.)

## Symmetry Park, Aston Clifton

Extending to a total of 46 acres, Symmetry Park, Aston Clifton, J20 M25 has planning permission for 700,000 square feet of B2/B8 use space. Phase 1 is now under construction on a speculative basis and will be ready for occupation in Q1 of 2020. This phase comprises three high-quality detached warehouse/industrial units of 55,000, 83,000 (pre-let to Global Infusion Group) and 110,000 square feet respectively. The remaining land benefits from detailed planning consent for two units of 164,950 and 212,000 square feet.



## Symmetry Park, Biggleswade

Symmetry Park, Biggleswade has been pre-let to The Co-operative Group Limited with a detailed planning consent now in place for a new 661,000 square feet on the 50 acre site. The site is due to become operational in 2021.

Situated on the established Stratton Business Park, the site provides excellent road links to the national motorway network. Symmetry Park, Biggleswade is situated approximately 600m from the A1 providing fast access to the M25.



## 7. Deliverability & Tritax Experience (cont..)

### Symmetry Park, Darlington

Amazon has announced plans to open a new fulfilment centre at Symmetry Park, Darlington and begin recruitment for more than 1,000 new permanent jobs.

Amazon has started recruiting for a range of new roles for the fulfilment centre, including engineers, HR and IT professionals through to health & safety and finance specialists and operations managers.



## Tritax Symmetry Green Credentials

### UKGBC

Through Tritax Big Box REIT plc (TBBR), we are proud to have become a Gold Leaf Member of the UK Green Building Council (UKGBC) committing to the low carbon agenda. As part of our commitment, we have formed a working group of Consultants and Contractors, with detailed supply chain engagement, to undertake a detailed review of the specification, design and construction of new buildings. We are dedicated to continuous review to achieve year on year carbon reduction targeting net zero carbon delivery.

### BREEAM

Tritax Symmetry support and use BREEAM as a guideline for sustainable building practices and embraces local authorities' environmental requirements and objectives. BREEAM is the Building Research Establishment Environmental Assessment Method. It is the most widely used and robust method available for measuring and demonstrating the environmental performance of buildings.

### Energy in buildings

Tritax Symmetry are committed to delivering energy efficient, low carbon and cost effective buildings, which we assess through building operation energy usage modelling. This is vital because Buildings are responsible for about half of all carbon dioxide emissions in the UK.

Reduce CO2 emissions and decrease the use of fossil fuels by:

- employing renewable energy sources wherever possible
- reducing transport during construction by sourcing materials and components locally
- implementing facilities to minimise car travel for future employers and clients
- avoiding mechanical cooling and investing into natural cooling and natural ventilation
- designing for a maximum use of daylight
- designing automatic lighting controls and fit low energy and LED lighting throughout the site
- minimise the use of finite sources and use renewable sustainable elements instead.

Reduce waste by

- providing recycling facilities during and after construction
- use recycled components and recycled aggregates wherever possible
- considering the possibility of creating energy from waste
- considering off-site manufacture.







## 8. Conclusion

- Symmetry Park, Gloucester East and West should be allocated in the Stroud Local Plan for large scale strategic employment development to meet the needs of Stroud, Gloucester and the wider Gloucestershire region
- The sites could accommodate up to 2 million square feet of modern warehouse space to meet the regional employment need
- The sites are suitable for the development of large scale strategic warehouses which would meet the average requirement of the sector for units of 266,000 square feet
- Development of the sites for modern warehousing would provide 2,479\* jobs for local people
- A diverse range of employment opportunities would be created for local people
- The sites are highly accessible, located close to junction 12, M5
- The site are sustainably located on the south east fringe of Gloucester City, accessible via sustainable modes of transport



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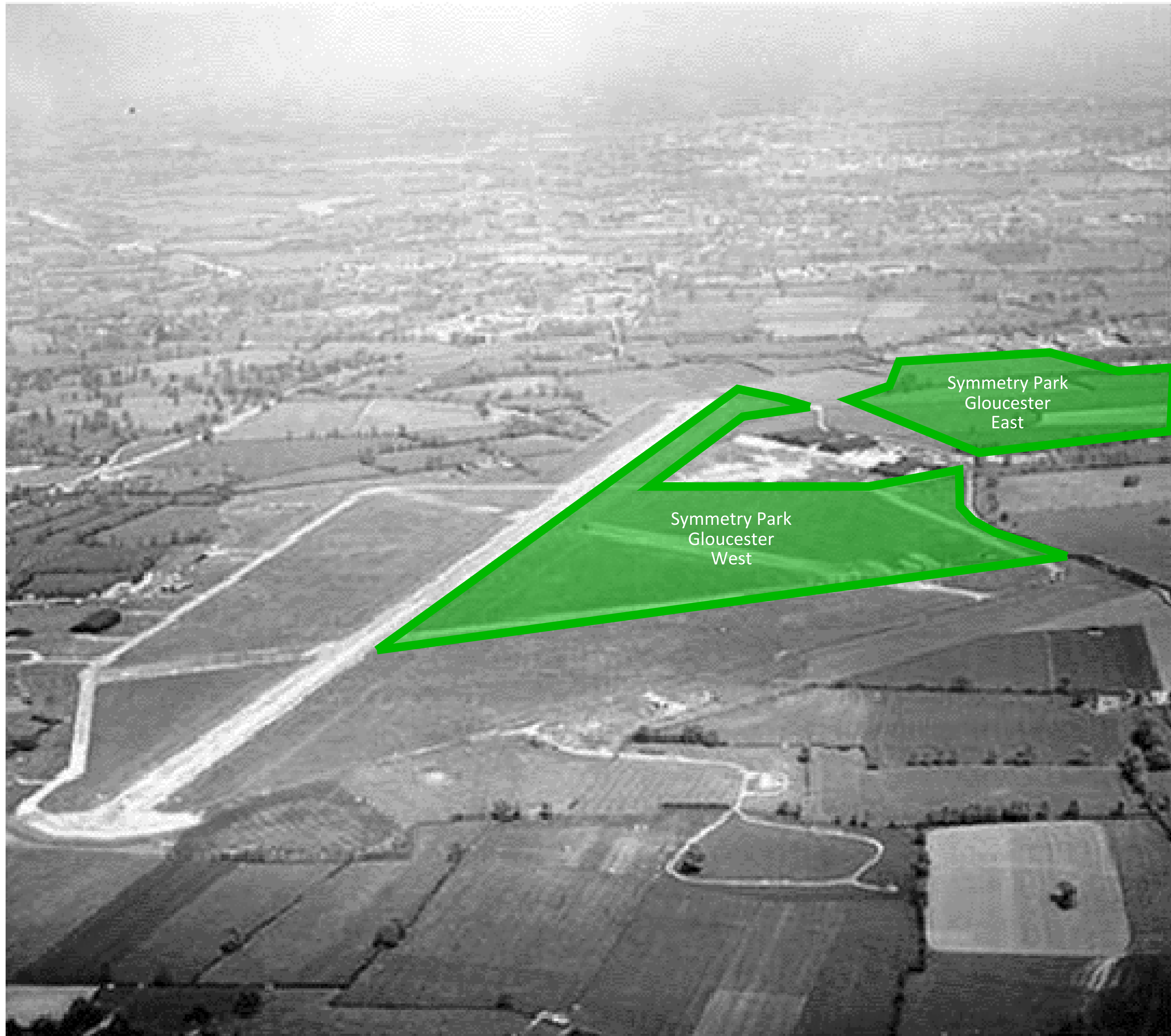
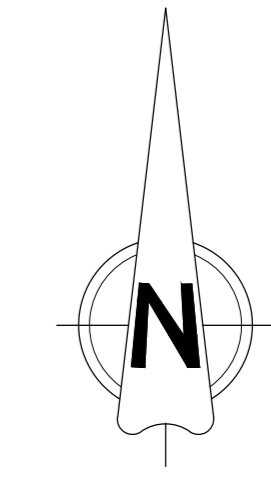
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# APPENDIX 4

## Historic Aerial Image

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project  
Symmetry Park  
Junction 12, M5  
Gloucester

drawing  
Historic Aerial Image

scale	NTS	drawn	mjl
checked	mjl	date	22/11/20

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