

EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

Response of Tritax Symmetry (Gloucester) Limited

Matter 8 Employment Provision

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Issue 8 – Does the Plan set out a positively prepared strategy for the provision of employment land to meet identified needs within the Borough that is justified and effective. Are the policies for employment development sound?

Employment land supply

Table 5 of the Plan (page 40) summarises the employment land supply as 79 ha for the plan period. This consists of eight new strategic employment sites, as allocated in Core Policy CP2 and individual site allocation policies.

The Employment Land Review (2021) (ELR) (EB30) identifies a land supply to meet the needs. It concludes that a realistic supply of possible employment land supply to 2040 is 105.14 ha, consisting of 14 main sites.

Table 4 of the Plan (page 37) sets out total commitments of 52.1 ha (as at April 2020) and potential losses of 40.6 ha, leaving an available supply of commitments of 11.5 ha. Deducting this from the employment requirement for the plan period of 62.4-71.8 ha leaves a residual employment land requirement of 50.9-60.3 ha.

Taking into account relevant questions under Matter 4 our queries on employment land supply are as follows:

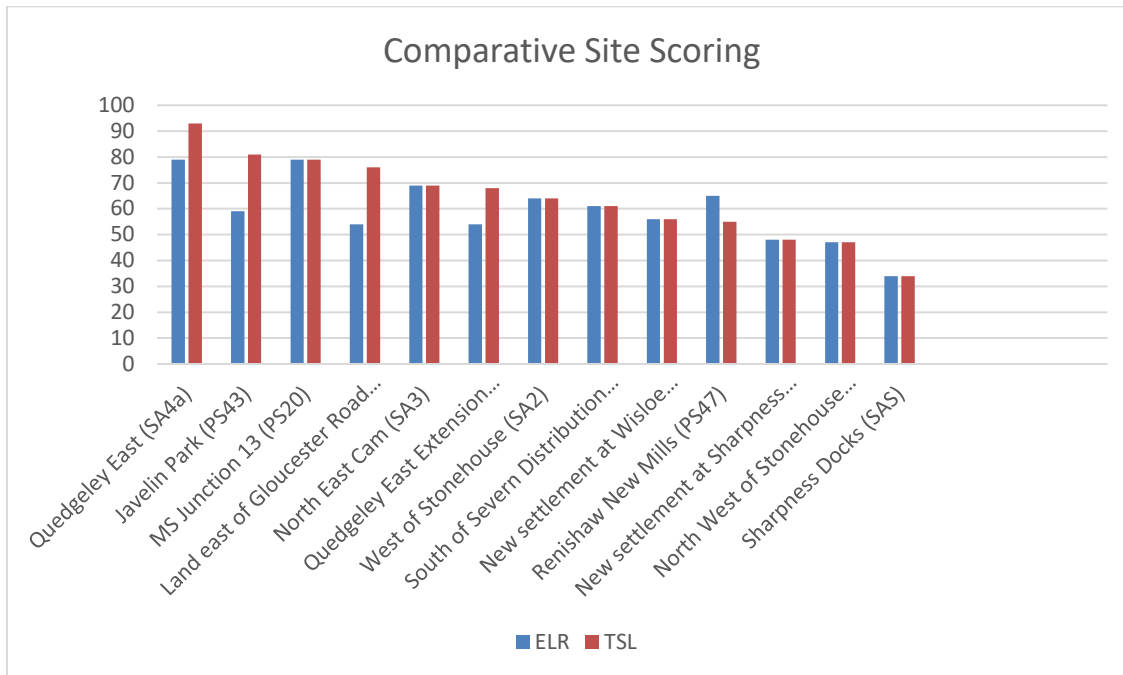
1. Are more recent updates available on employment completions, commitments and losses since the start of the plan period?
 2. Is the methodology on assessing employment land supply in the ELR justified and consistent with national policy and guidance?
 3. If the ELR shows that an employment land supply of 105.14 ha (comprising of 14 main sites) is available, is it clear how the Council has determined which sites should be included in the Plan? How does this fit with the Council's methodology for site assessment and selection as set out in the SALA (EB18) and its findings (EB19-EB26)?
 4. Paragraph 4.1 of the Employment Topic Paper (EB7) identifies that the level of existing commitments and Plan allocations exceeds the employment land need identified in the ENA study as 62.4-71.8ha. It states that the 'additional supply, above need levels, provides a buffer to allow for further losses of employment land, to other uses, to 2040'. What further losses is this referring to and is this approach justified?
- 8.1 We have commented in respect of Matter 6 on whether the employment element of the 14 main sites is justified, viable and deliverable or developable. In our view there is not a realistic supply of possible employment land supply to 2040 of 105.14 ha from the sites identified to meet identified need.
- 8.2 The methodology ignores any consideration of whether the sites will deliver the employment land needed over the plan period.
- 8.3 The first of the three overarching objectives for achieving sustainable development is that to achieve the economic objective; to help build a strong, responsive and competitive economy, the planning system must ensure that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity. (NPPF para 8)
- 8.4 In respect of building a strong, competitive economy planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. (NPPF para 83)

Table 2: ELR Scoring Gloucester Road East

Land east of Gloucester Road (B4008)	ELR Score	TSL Comment	TSL Score
Size (ha)	15.8		
Location	9		9
Prominence	6		6
Public Transport	0	The adjacent B4008 is a bus route with stops on the site frontage.	10
Sequential test	3		3
Planning Status	1		1
Services Availability	7		7
Constraints	8		8
Environmental Setting	6	This is a greenfield site.	10
Flexibility	8	At 15.8 hectares and a flat, fairly regular shape there is no impediment to accommodate any size of business.	10
Site Availability	6	The site is controlled by an employment developer and is available to develop subject to planning.	8
Total	54		72

8.5 We have updated ELR Figure 16 – Sites Scoring – Realistic Supply (Main Sites) with our own scoring as set out above. This elevates the overall quality of Javelin Park and Land East of Gloucester Road and increases the sites’ priority for Local Plan allocation.

Figure 1 – Sites Scoring – Realistic Supply (Main Sites)



- 5.1 The site selection process should include a realistic view on the delivery of sites over the plan period.
- 5.2 The Strategy should allocate strategic and local employment sites in realistic proportions to reflect need, demand and take-up to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth.