

Stroud District Local Plan Review

Issues and Options Paper

GFirstLEP Construction & Infrastructure Business Group.

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1.0 Introduction

1.1 This representation has been prepared by.....

1.2 The Stroud Local Plan was adopted in November 2015, following the examination of the Plan which took place in April 2014 and April 2015.

1.3 In paragraph 67 of the Inspectors report into the Local Plan, he stated:

*“Another key element of Policy CP2 is the commitment to review the SDLP to consider the housing needs of neighbouring planning authorities; a similar policy is included in the submitted JCS. **This review process has been prepared in discussion with the JCS authorities [REX/B09] and is an effective, justified and pragmatic contingency measure to address the possibility of future unmet development needs arising from outside or within Stroud district.** This approach is supported by the Written Ministerial Statement of 21 July 2015, which confirms that a commitment to an early review may be an appropriate way of ensuring that a local plan is not unnecessarily delayed by seeking to resolve matters which are not critical to its soundness or legal competence as a whole; it also helps to ensure that the SDLP is in place at the earliest opportunity, another key element of ministerial guidance.”* (our emphasis)

1.4 Paragraph 2.72 of the adopted Plan states:

“If local planning authorities in the housing market area can demonstrate through their local plan process that there are unmet development and infrastructure needs that could be met more sustainably through provision in Stroud District, these will be considered, including through an early review of this Local Plan, commencing within five years from adoption or by December 2019, whichever is the sooner.”

1.5 The adoption of the Local Plan was therefore subject to the Council undertaking an early review, and the Council is now starting the process of reviewing the current Stroud District Local Plan which is welcomed.

1.6 The Issues and Options version of the Local Plan Review is currently undergoing consultation. This plan presents the opportunity to identify emerging issues and

identify ways of distributing and managing future development needs should these be required.

2.0 Planning Policy Context

National Planning Policy and Guidance

- 2.1 The Core Policies of the Framework (paragraph 17) set out that the planning system should:

*“be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. **Plans should be kept up-to-date, and be based on joint working and co-operation** to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.”(our emphasis)*

- 2.2 The Core Policies also state that planning should:

“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business community.”

- 2.3 Paragraph 19 sets out that:

“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”

- 2.4 Paragraph 21 states that:

“Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of

infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:

- *Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- *Set criteria; or identify strategic sites, for local inward investment to match the strategy and to meet anticipated needs over the plan period.*

2.5 The Framework also requires LPAs (paragraph 161) to use their evidence base to ensure that the existing and future supply of land available for economic development is sufficient and suitable to meet their economic needs.

2.6 The Planning Practice Guidance: '*Housing and economic development needs assessments*' highlights that in understanding the current market in relation to economic and main town centre uses, plan makers should liaise closely with the business community to understand their current and potential future requirements.

2.7 In particular, consideration should be given to:

- *The recent pattern of employment land supply and loss to other uses; Market intelligence (from local data and discussions with developers and property agents, recent surveys of business needs or engagement with business and economic forums);*
- *Market signals, such as levels and changes in rental values, and differentials between land values in different uses;*
- *Public information on employment land and premises required;*
- *Information held by other public sector bodies and utilities in relation to infrastructure constraints; The existing stock of employment land;*
- *The locational and premises requirements of particular types of business; and*
- *Identification of oversupply and evidence of market failure (e.g. physical or ownership constraints that prevent the employment site being used effectively,*

which could be evidenced by unfulfilled requirements from business, yet developers are not prepared to build premises at the prevailing market rents).

- 2.8 With regard to the type of employment land that is needed, there needs to be a different policy response to local requirements to ensure that a range and variety of employment sites are provided.

Strategic Economic Plan for Gloucestershire, March 2014

- 2.9 Gloucestershire has a strong economy but there are major opportunities for expansion and the Strategic Economic Plan (SEP) has set a bold target to achieve growth above the national average. The Strategic Economic Plan for Gloucestershire aims to accelerate economic growth and address challenges within the County. Some of the challenges that need to be addressed are:

- Promoting the growth of knowledge intensive sectors;
- Exploring the export potential of SMEs;
- Capitalising on our entrepreneurial culture;

Whilst the County demonstrates high employment rates and high economic activity rates, it is recognised that there is a lack of suitable premises for high value businesses and an insufficient number of attractive development sites. The SEP has therefore identified a 'Growth Zone' along the M5 corridor, the aim of which is:

"The primary aim of the Growth Zone is to ensure the availability of quality employment land in proximity to the M5 motorway attractive to business and with excellent connectivity throughout Gloucestershire and the rest of the UK. This will serve the latent demand in the market place and provide space required to enable Growth Hub supported business growth."

and

"Focused on the M5 motorway corridor, the Growth Zone will provide space for sustainable business expansion by ensuring the availability of employment land in

the best locations in the county with the necessary transport infrastructure essential to attract and retain high value-added business.”

Stroud District Local Plan November 2015

2.10 The adopted Local Plan sets out key economic policies state:

*“Supporting economic growth by delivering a range and mix of employment uses, sites and types **in the most appropriate location** for that particular use, supported by and integrated with housing and other community infrastructure.”* (our emphasis)

2.11 The economic future of the District is set out in strategic objective SO2, which states:

“Providing for a strong, diverse, vibrant local economy that enables balanced economic growth, coupled with enhanced job opportunities across the District.”

2.12 Core Policy CP2 is all about strategic growth and new development locations, seeking to concentrate most of the District’s new growth at a series of strategic locations. The policy specifies that the strategic sites will be made up of locations at the principal settlements and key employment market areas such as the M5/A38 Corridor and south of Gloucester.

2.13 Policy CP11 relates primarily to the delivery of new employment development within the District. The employment policies and objectives of the Plan have been designed to have regard to both strategic and local business needs and aim to facilitate a flexible supply of land to assist in moving forward to a low carbon economy.

2.14 The Policy identifies that with too few jobs in the District, and jobs that only cater for a lower skills base, are factors that have led to considerable movement of higher skilled workers out of the District to other centres of employment such as Cheltenham and Bristol which are accessible and convenient centres for high skilled employment.

2.15 The Local Plan recognises that the District has a reputation for advanced technology and creative skills and accordingly needs to provide new and attractive employment sites to encourage the development of these sectors within the District.

2.16 The text of the Policy itself, seeks to provide new employment development through a range of sites and premises across the District.

3.0 Needs: Local Economy and Jobs

3.1 Section 2.1 of the Issues and Options Consultation asks if there are specific business requirements or economic needs which are not being met within the District due to a lack of suitable sites.

Question 2.1a What do you think are the biggest challenges facing the local economy in Gloucestershire for the future? How can we help to address these? Does Stroud District have a specific role to play, relating to business start-ups and specialist technologies or should we seek to compete with other locations for growth.

3.2 At a county level, GFirst LEP's Strategic Economic Plan (SEP) has undertaken a SWOT analysis of economic growth in Gloucestershire. The weaknesses identified are as follows:

- Low recent levels of economic growth;
- Low productivity relative to the UK;
- Under-representation in knowledge-intensive services;
- Under exploited export potential;
- Pockets of county with persistent deprivation and high unemployment;
- Gaps in high speed broadband coverage in rural areas;
- Gaps in reliable mobile phone network coverage;
- Barriers to services in rural areas;
- Low average number of patents per head;
- Failure to retain our talented young people;
- Gaps in business support and lack of knowledge of how to access services;
- High car dependency;

- High levels of commuting within the county;
- Congestion problems around A417 – The ‘Missing Link’; A46 Tewkesbury to M5; A40 to west of River Severn; A40 between Gloucester and Cheltenham; Cheltenham and Gloucester centres;
- Limited direct train services to London
- Relatively high house prices a barrier to first time buyers entering the property market

3.3 At a District level, the employment *Key Issues* identified in Section 1 of the Local Plan summaries the challenges as:

- *Stroud District has relatively low levels of unemployment but there are too few jobs within the District itself to meet the needs of the resident workforce.*
- *There are high levels of daily commuting out of and into the District, but overall there is a significant net outflow of people working in larger centres like Bristol, Gloucester, Cheltenham and Swindon.*
- *Projections suggest a need to plan for between 6,800 and 12,500 net new jobs (2006-2031) and a need to provide about 58 ha of additional employment (B1-B8) land from 2006 to 2031, based upon past take-up rates.*
- *The District needs to attract more knowledge-based industries, enabling greater employment opportunities for the highly skilled and well qualified working population.*
- *Improved access is required to land and premises, particularly to the east of the District.*
- *Stroud has a higher percentage of factory and warehouse stock and less office and retail floor space than either the county or South West average. There is a need to rebalance the stock to help meet the skills of the resident population and to reflect changes in employment demands.*

- *There is an issue of quality of employment stock in the District. Stroud District lacks, in particular, modern office premises with business support services and freehold small industrial sites.*
- *A large proportion of the District's current protected employment land lies along the valley bottoms to the east, west and south of Stroud, where sites are constrained and transport and infrastructure are inconvenient for many traditional industries.*
- *Many of the District's historic mills are unsuited to modern industry, and some have fallen vacant, but converting them solely for other uses could undermine the District's employment base.*
- *Many of our current employment sites are on low-lying land, close to rivers; some are already flood-prone and future climate change may increase the risk.*
- *The high quality environment constrains the location of some forms of commercial development but also provides opportunities for others.*

3.4 The specific problems of the Stroud District Local economy are therefore that there are too few high quality employment sites within the Growth Zone to target and address the problems identified above.

3.5 Of particular concern is that existing sites are generally poor quality which fails to attract the high quality or knowledge intensive businesses. As a consequence fewer high quality businesses are locating in the District failing to provide a variety of employment particularly in a time when it is recognised that manufacturing businesses are in decline.

3.6 Given the current population structure within Stroud, this imbalance will exacerbate the existing *high levels of daily commuting out of and into the District*, to larger centres like Bristol, Gloucester, Cheltenham and Swindon.

3.7 Given the high entrepreneurial culture in Stroud, it is considered that new accessible and high quality business/parks should be provided in order to nurture and expand

existing businesses and provide land and premises for new knowledge-intensive businesses.

Question 2.1b Do you think there is a need for further employment land allocations? If yes what types of premises are required and where should they be located?

- 3.8 The latest Employment Land Availability Study (April 2017) shows that the Council has a potential surplus of employment land of approximately 6.66ha over the required provision of 58ha up to 2031. Whilst this does demonstrate that the Council currently does have sufficient supply over and above the Local Plan requirement, it is considered that such a small margin can be very fragile especially when employment land is constantly under pressure from other uses.
- 3.9 It is also of concern that in April 2015, the Employment Land Availability report for the Council showed that there was 35.85ha surplus of employment land. In 2017 this surplus has been significantly reduced primarily through losses to other uses. It is apparent that there have been further losses (Avocet Trading Estate, Daniels Industrial Estate and Bath Road Trading Estate) which may further reduce the surplus and lead to a shortfall of employment land in the District.
- 3.10 It is also of concern that some of the allocations within the Local Plan do not address the issue of providing high quality employment land (Sharpness, Quedgeley East and Cam) in accessible locations and accordingly will not address the employment issues in the District. Equally with a lot of the existing employment sites being in historically constrained locations, it is likely that these will increasingly become less attractive for employment used and will continue to be lost to other uses.
- 3.11 In accordance with extant policy, it is therefore considered that the Local Plan Review should undertake a qualitative and quantitative assessment of its existing and proposed employment sites to suitable consider whether these are capable of addressing the districts identified employment issues.

Question 2.1c Do you think locating growth adjacent to M5 junctions should be supported; or would continuing expansion of employment land at existing settlements/sites be preferable?

3.12 Section 4.1.3 of the SEP states:

'The primary aim of the Growth Zone is to ensure the availability of quality employment land in proximity to the M5 motorway attractive to businesses and with excellent connectivity throughout Gloucestershire and the rest of the UK. This will serve latent demand in the marketplace and provide the space required to enable Growth Hub supported businesses to grow.'

'Focused on the M5 motorway corridor, the Growth Zone will provide space for sustainable business expansion by ensuring the availability of employment land in the best locations in the county with the necessary transport infrastructure essential to attract and retain high value-added businesses.'

3.13 It is considered that new strategic employment growth adjacent to M5 junctions should be supported and would be an attractive location for new business growth in the District.

3.14 Expansion at existing business park/locations should also be supported where this will support indigenous business expansion/growth.

Question 2.1d Should there be increased flexibility to allow other job generating uses on all employment sites or would this limit the options for those companies operating in the B classes? Should increased flexibility be allowed only on some sites? Please specify any sites where a more flexible approach could be taken. Alternatively, a percentage threshold, in terms of units or site floorspace, could be identified for non B class employment uses, which might help to provide services to other businesses?

3.15 On existing and proposed strategic employment allocations, the predominant use should be B class uses. Should new opportunities come forward for strategic employment growth in the Growth Zone that promotes new high quality business

accommodation, the primary use should only be for B class uses. Any other uses should only be an ancillary component to support the B class uses.

- 3.16 The retention of B class uses on new strategic employment sites within the District is essential as it is apparent that the older and more historic sites will become less attractive for commercial uses and will inevitably be lost to other uses. Accordingly, the Council should ensure that it has the ability to replace these sites with new sites within the growth zone that are rigorously protected for employment purposes.

4.0 Future Growth Strategy

Question 3.1 How should we meet future development needs?

- **Option 1: Continue to concentrate housing and employment development at a few large sites located adjacent to the main towns in the district**
- **Option 2: Take a more dispersed approach with some medium sized housing and employment sites on the edge of the larger villages, as well as towns**
- **Option 3: Disperse development across the district with most villages including at least one small to medium site allocated to meet local needs**
- **Option 4: Identify a growth point in the district to include significant growth, either as an expansion of an existing settlement, or to create a new settlement**
- **Option 5: Do you have an alternative strategy option that you would like us to consider? Do you have a preferred option? Or would some combination of these approaches be the best way to meet our future needs? Please explain why.**

4.1 GFirst LEP is primarily concerned with economic growth and makes not specific comment on the future development strategy for the District. However looking at options for employment growth only, it is considered that new strategic employment sites should be located in the Growth Zone adjacent to the M5 corridor. These will be attractive to new and existing businesses and will provide more accessible locations for high quality employment development.

4.2 New allocations should be of sufficient size to cater for a variety of different sized businesses and allow the clustering of knowledge intensive businesses in one location.

Question 3.4 Do you agree with the current hierarchy-based approach towards identifying settlements suitable for different levels of development? Is there a different approach you would prefer? Do you agree with the different tiers

identified in the current Local Plan and the scale of development proposed for each tier? Are any of the settlements in the wrong tier and, if so, for what reason?

4.3 See response to 3.1 above.

Question 3.6 Read through the settlement summaries over the following pages and tell us whether you agree with the potential broad locations for growth, if future housing, employment or community facilities are needed. Where more than one location is identified you can tell us which is the best option.

4.4 The following are agreed as appropriate locations for employment growth:

- Eastington/Alkerton: B1 and B2;
- Stonehouse: A, B1, B2, D1, D2;
- Cam: A, B, C, D, E;
- Hardwicke: A1, A2, A3, A4;
- Newtown and Sharpness: A1, A2, A3, A4, A5 – as part of a growth point;

4.5 The best options are Eastington, Stonehouse and a growth point at Newtown/Sharpness. These all provide accessible locations within the Growth Zone.

5.0 Evidence and Information

Question 4.1 Are there any specific additional local studies or data that you believe are needed to inform the Local Plan review? Have you any advice on the scope or content of any of these studies? Have you prepared, or are you preparing your own studies, which may help to inform the Local Plan?

- 5.1 The Council should have regard to the employment studies prepared as part of the evidence base for the Local Plan.
- 5.2 There is concern over the accuracy of the Employment Land Availability reports prepared for the Council and in particular whether all the employment losses have been accounted for. It is considered that a more in-depth study of the employment land supply should be conducted by the Council to inform the Local Plan Review.
- 5.3 It is considered that the Council should be ambitious about the allocation of new employment land allocations and where good sites are identified, large allocations should be secured to ensure a robust supply of employment land is available to the District within the Local Plan Period.

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