

Matter 8 Employment Provision

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?
- 8.1.1 The Employment Land Availability Report 2022 (EB118) reports employment completions and losses in the two years since the start of the plan period and commitments as at 01 April 2022.
2. Is the methodology on assessing employment land supply in the ELR justified and consistent with national policy and guidance?
- 8.2.1 The five-stage methodology for assessing employment land supply within the Employment Land Review (EB30) complies with the Planning Practice Guidance *Housing and Economic Land Availability Assessment*, issued in 2014 and updated in 2018-19. Table 1 of the ELR details how the methodology aligns with 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)?
- 8.3.1 The Council considers that the SALA process has robustly identified and assessed all relevant sites. The SALA 2016 considered potential land identified

from a full range of available data sources together with specific sites promoted by landowners/ developers or other stakeholders. A call for sites formed part of public consultation at each stage of the Local Plan review, from Issues and Options 2017 through to Additional Housing Options Consultation 2020, with new sites assessed and reported as an annual update to the SALA (EB19 – EB26).

- 8.3.2 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail how the SALA process has robustly identified and assessed all relevant sites throughout the Local Plan review and provided a clear understanding of the land available to inform the identification, assessment and selection of sites for the Pre-submission Local Plan.
- 8.3.3 All employment sites submitted to the Council for consideration have been assessed in accordance with the Council's methodology for site assessment and selection as set out in the SALA (EB18). Within this, all sites were assessed and presented on their own merits, which together could deliver strategic goals and a certain quantum of growth for the District.
- 8.3.4 The process of the Council determining which sites should be included in the plan was as follows:
- 8.3.5 In the preparation of the Emerging Strategy, the four options (concentration, dispersal in medium sized sites on edge of larger villages and towns, dispersal in most villages and a growth point) were 'fleshed out' by assigning development quanta to each strategy option, based on the SALA assessment on deliverability and the location of potential sites that could 'fit' each strategy. These options were then further tested, by undertaking a series of planning and transport related assessments, together with a high level assessment of each option against sustainability objectives as identified through the Sustainability Appraisal / Strategic Environmental Assessment process, complemented by an assessment of individual site impacts.
- 8.3.6 Strategic options were then refined and narrowed, and sites began to be discounted and filtered out, if they were not in conformity with the emerging growth strategy; a 'hybrid' of development in tier 1 main towns, housing and employment growth centred at two new settlements; Sharpness and Wisloe, strategic employment growth concentrated within A38/M5 corridor, modest growth at tier 2 and lesser levels of growth at tier 2.
- 8.3.7 As explained in the Topic Paper: The Development Strategy (EB73), whilst the initial assessment of spatial options took into account a range of factors including the potential future distribution of both housing and employment growth, further research into the location of existing and likely future commercial markets and the particular needs of employment sectors within Stroud District helped to further refine the emerging development strategy.
- 8.3.8 In 2020, the Gloucestershire Economic Needs Assessment (EB29) set out an objectively assessed requirement of between 62.4 and 71.8 hectares of employment land for the plan period, based on expected labour supply and a growth scenario supporting further growth in the key Local Industrial Strategy sectors. The ENA was a jointly commissioned by the six Gloucestershire

authorities, therefore it's timescale at this stage of the Stroud Local Plan process was not controlled by Stroud District Council.

- 8.3.9 Following on from the ENA, the Stroud District Employment Land Review (EB30) was undertaken in 2021 and identified six key segments of market demand for future employment land supply to satisfy: large industrial/warehousing units at key locations within the A38/M5 corridor, serving the wider Gloucestershire/regional market; meeting the growth needs of existing mid-sized/ large local manufacturing and warehousing businesses in Stonehouse/Stroud Valleys; meeting the needs for larger offices in the Stonehouse area; supporting local scale expansion at existing employment areas; development space to meet the needs of specific businesses; and encouraging the growth of the high-technology sectors, particularly focussed on green technologies.
- 8.3.10 The development strategy has evolved to ensure that the spatial needs of our economy can be met at a variety of locations: in particular, new employment land located at the key employment property market areas identified in the ELR: south of Gloucester; within the M5/A38 corridor, at Stonehouse, Stroud, Cam/Dursley, Berkeley/Sharpness; and the Stroud Valleys. These include areas near to existing successful business parks at Quedgeley East (Hardwicke), Severn Distribution Park (Sharpness) and Stroudwater Business Park (Stonehouse), and co-located with new housing at the proposed new settlements.
- 8.3.11 As part of the ELR (EB30), consultants assessed the suitability, availability and deliverability of eight Draft Local Plan 2019 strategic employment sites, four additional undeveloped adopted Local Plan 2015 allocation sites and six further employment sites submitted through consultation on the Emerging Strategy or Draft Plan consultations. The report discounts four sites as not suitable or not available to meet general employment needs and recommended that the realistically available land supply in Stroud District, comprising the remaining 14 main sites, was 105.14 ha.
- 8.3.12 The Plan takes forward eight of these sites as proposed Strategic Employment Allocations in accordance with recommendations of the ELR that the sites are deliverable. With regards to the remaining six sites assessed by the ELR, four remaining 2015 Local Plan sites have got planning permission so have been included in the 50.74ha commitment figure. Land north of Grove End Farm was submitted as a mixed use site and was ruled out as a 'growth point' by Sustainability Appraisal at the Additional Housing Options Stage and Land West of Gloucester was submitted by Tritax Symmetry and the plan takes into account the larger amended site to the original PS43 Javelin Park draft allocation.
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?

8.4.1 As shown in the answer to Matter 4 Q5, the percent of additional employment land being proposed is between 40% - 56% above the identified minimum requirement of 62.4-71.8ha, identified in the Gloucestershire Economic Needs Assessment (EB29). The table below highlights the method for calculating this.

			Labour Supply	Labour Demand
Requirement	A	Employment requirement for 1 April 2020 to 31 March 2040	62.4	71.8
	B	Additional losses (difference between 27ha in GENA and 49ha in ELR)	22	22
	C	Minimum employment requirement to 2040 (= A+B)	84.4	93.8
Supply	D	Built 2020 to 2022	15.02	15.02
	E	Commitments, at 1 April 2022 (on sites with permission / under construction)	37.39	37.39
	F	Allocated employment sites in Local Plan	79	79
	G	Total available from 2020 (D+E+F)	131.41	131.41
	H	Difference between Local Plan allocations and minimum residual employment requirement (= F - C)	47.01	37.61
	I	Percent (%) of additional allocated employment land proposed above identified requirement. (= H/C *100)	56%	40%

8.4.2 The Council's updated evidence on historic losses since 2006 has increased the requirement by a further 22ha to 84.4-93.8ha to accommodate additional potential losses not incorporated within the ENA recommendations for net need. The Council's approach is justified and supported by paragraph 7.14 pf the Employment Land Review (EB30) which confirms that in addition to future losses from existing permissions, there are likely to be further losses from the local employment stock in the 20 years to 2040, which will need replacing and additional supply safeguarded against any future loss in the baseline supply.

New employment development – Core Policy CP11

5. Core Policy CP11 supports new employment development.

a. In accordance with paragraph 16 of the Framework, is the purpose of the policy clear and does it avoid unnecessary duplication of other policies?

8.5.1 The Council considers the purpose of the policy is clear and is clearly set out in both the six policy criteria and supporting text. There is no duplication with other policies and any signposting to other detailed delivery policies is clear and in accordance with NPPF paragraph 16.

- b. Is it consistent with paragraph 82 of the Framework, particularly in relation to providing sufficient flexibility?

8.5.2 The Council consider the policy is consistent with paragraph 82 as it allows new employment development to be provided through a range of sites and premises across the District allowing flexibility and choice. Strategic employment sites will be allocated, mixed use developments encouraged and the expansion of existing businesses and rural diversification supported. Employment sites will be provided in order to increase the range and choice of sites available and to address the self-containment of settlements in terms of homes / jobs balance. Small work places, live-work units and facilities for co-working will be supported as part of new housing developments.

- c. Would the policy wording modifications in relation to providing sufficient flexibility and the inclusion of waste management infrastructure, as suggested by representors, ensure the policy was effective and consistent with national policy or would other changes be necessary to achieve this?

8.5.3 The Council proposes a modification to the supporting text para 5.2 to add the word 'waste management' before the word tourism. This is as a result of further discussions with the County Council and is covered in an updated SoCG. This removes the concerns received at the Regulation 19 consultation and the Council consider the policy is consistent with national policy.

Key employment sites - Delivery Policy E11

6. Delivery Policy E11 seeks the retention of key employment sites for employment uses.

- a. Is it clear how the list of key employment sites has been determined and is it justified?

8.6.1 Through the Employment Land Review (EB30), each Key Employment Site was appraised and assessed through a combination of site visits, local intelligence, consultations with landowners and the views of those involved in the local property market. Table 31 of the ELR summarises the results and provides a recommendation to whether the site should be retained. The Council considers the ELR recommendations are justified when determining Key Employment Sites.

- b. Is the policy consistent with paragraph 82 of the Framework, particularly in relation to providing sufficient flexibility and to enable a rapid response to changes in economic circumstances?

8.6.2 In order to create the right conditions for economic prosperity that enables rapid response to economic changes, it is very important that an adequate supply of

land to meet development needs is provided. National policy and paragraph 82 advise councils to ensure that there is sufficient land available, which is readily capable of development and is well served by infrastructure, on a variety of sites, as far as possible providing a balance between employment and population.

- 8.6.3 The policy provides 37 key employment sites that are retained for B and E(g) Class Uses. This provides flexibility across a range of locations, offering choice and access to different infrastructure types to support economic development. The policy allows uses to adapt quickly by allowing redevelopment while also allowing for the provision of ancillary uses specifically designed to support the primary use (for example, catering or additional parking areas).

Regenerating existing employment sites - Delivery Policy E12

7. Delivery Policy E12 permits the regeneration of five employment sites for mixed uses.

a. Is it clear how the list of sites has been determined and is it justified?

- 8.7.1 Through the Employment Land Review (EB30), each site was appraised and assessed through a combination of site visits, local intelligence, consultations with landowners, planning permissions and the views of those involved in the local property market. Table 31 of the ELR summarises the results and provides a recommendation to whether the site should be included. The Council considers the ELR recommendations are justified when determining the sites E12.

b. What is the reason for including the caveat 'provided that there are demonstrable environmental and/or conservation benefits' and is this justified and effective?

- 8.7.2 Policy E12 aims to regenerate sites which would otherwise remain under-used or might potentially be lost entirely to alternative uses, such as housing. To facilitate regeneration of these sites, and to help deliver the mini-visions for the parish cluster areas, the Council is taking a more flexible approach to uses on site. The references to environmental and conservation benefits reflects the fact that most of the sites set out in the policy are historic mill buildings and/or within historic conservation areas where such benefits would be required to deliver the local mini-visions. For example, 3 of the identified sites are within the Stroud Valleys where the mini vision is seeking to deliver regeneration of the industrial valley bottoms, to "provide a new lease of life for the valleys' rich architectural heritage: a home for thriving businesses, creative industries and green technologies, as well as for people. This will be an environment that improves walking and cycling links through the area, boosts tourism, conserves, enhances and connects habitats along its valued river corridors and provides an exciting and tranquil amenity for the District's residents." (Stroud valleys mini vision, SDLP, page 70). The other site is located at Kingswood where the mini-vision for the Wotton Cluster identifies the settlement has "an attractive landscape setting...boosted by pleasant and safe green walking and cycling links" (SDLP page 200). The policy

therefore identifies environmental and conservation benefits to deliver the mini-
vision for the areas.

- c. The policy seeks the provision of at least the same employment opportunities as existed when the employment site was previously used. Whilst this is subject to viability and site specific circumstances, how would a decision-maker determine what the previous level of employment opportunities were and the circumstances when this would not apply? Is this approach justified and effective? Is it consistent with national policy, particularly paragraph 82 of the Framework?

8.7.3 Policy EI2 aims to regenerate sites which would otherwise remain under-used or might potentially be lost entirely to alternative uses, such as housing. The requirement to provide at least the same employment opportunities is to ensure similar employment use types are provided to ensure redevelopment is in keeping with and sensitive to local character and amenity considerations. This would not apply if the decision maker is unable to identify the nature and scale of previous operations, for example if the site had been cleared for a significant period or if a viability or other site specific circumstances were prohibitive.

8.7.4 This policy approach was previously included in the 2015 SDLP and has proved to be effective and justified. The Council considers this is consistent with paragraph 82 of the Framework as the policy will deliver on the Council's wider visions for regeneration contained within the SDLP. The policy will also support paragraph 112 and the need for proposals to respond to local character.

- d. Would the policy wording modifications, as suggested by representors, ensure the policy was effective and consistent with national policy or would other changes be necessary to achieve this?

8.7.5 The Council proposes a modification to the supporting text para 5.24 to add the bolded text:

8.7.6 Mixed-use redevelopment will be expected to provide important community and/or regeneration benefits and avoid adverse impacts on adjoining uses, such as locating incompatible land uses adjacent to well established employment uses or waste management sites thereby prejudicing their efficient operation.

8.7.7 This is as a result of further discussions with the County Council and is covered in an updated SoCG. This removes the concerns received to the Regulation 19 consultation and the Council consider the policy is consistent with national policy.

Former Berkeley Power Station - Delivery Policy EI2a

8. Delivery Policy EI2a seeks the retention of the former power station for employment and employment related uses, and for operations and uses associated with the decommissioning of the power station.

- a. Is the policy sufficiently clear and effective?
- b. Are the suggested wording modifications, to secure improvements to related infrastructure and provide clarity on the distinction between the de-licensed and licensed parts of the site, necessary for effectiveness of the policy?

8.8.1 The Council considers that the policy, read in conjunction with the supporting text, is clear about the uses which will be supported at the former Berkeley Power Station and hence will be effective.

8.8.2 The Council has sought to accommodate the wording changes proposed by the Nuclear Decommissioning Authority at the Draft Local Plan stage. Paragraphs 5.25 and 5.26 include the suggested text put forward by the representor to clarify the distinctions between the licensed and de-licensed sites.

8.8.3 If further clarity is required, the Council is prepared to support a modification as set out below:

The de-licensed site will be retained for office, B2 and B8 employment uses and for employment related training and education purposes. The nuclear licensed site will be retained for operations and uses associated with the decommissioning of the nuclear power station. Redevelopment for unrelated alternative uses will not be permitted.

Development at existing employment sites in the countryside - Delivery Policy EI4

9. Is the purpose of the policy clear and is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, particularly paragraphs 84 and 85 of the Framework?

8.9.1 The policy is clear that its purpose is to support the extension and intensification of rural employment sites, subject to the consideration of relevant impacts on local amenities and adjoining land uses. Whilst the policy sits within the context of uses acceptable within the countryside, set out in Core Policy CP15, it provides specific detailed requirements which are not set out elsewhere within the SDLP.

8.9.2 The NPPF supports the sustainable growth of businesses in rural areas (paragraph 84) and includes broad requirements that development is sensitive to its surroundings and does not have an unacceptable impact on local roads (paragraph 85). The policy expands on both of these requirements. Criteria 3 relating to the consideration of using existing buildings before new buildings is specifically justified in supporting paragraph 5.29 because of the general policy of restraint set out in the SDLP for the open countryside. It also supports the principle of using previously developed land, as encouraged where suitable opportunities exist in the NPPF (paragraph 85).

Farm and forestry diversification - Delivery Policy EI5

10. Is the purpose of the policy clear and is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, particularly paragraphs 84 and 85 of the Framework?

8.10.1 The Council considers the purpose of the policy to be clearly set out in both the policy and the supporting text. The policy is justified as it is consistent with paragraphs 84 and 85 of the NPPF by promoting the development and diversification of agricultural and other land-based rural businesses. The five criteria within the policy ensure effective delivery of farm and forestry diversification.

Provision of new tourism opportunities - Delivery Policy EI10

11. Is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, including paragraphs 84 and 85 of the Framework?

8.11.1 The policy is justified as Stroud District has a wealth of natural and heritage assets which attract visitors from home and abroad that range from Berkeley Castle, to renowned attractions such as The Wildfowl and Wetlands Trust Centre on the Severn Estuary to our industrial heritage, country houses, commons, museums and gardens. Rural countryside within the Cotswolds AONB, Stroud's canal network, historic villages and other farm, market and animal attractions also draw visitors to the area.

8.11.2 The policy is effective and is consistent with paragraphs 84 and 85 of the Framework, the Council won't repeat the policy in full here, however all four criteria in the policy are consistent with and will deliver the aims of the NPPF.