

Rubicon Planning

STROUD DISTRICT LOCAL PLAN REVIEW 2020 - 2040

**PRE-SUBMISSION DRAFT PLAN (REGULATION 19) MAY
2021**

Comments on behalf of;

**Tritax Symmetry (Gloucester) Limited in respect of Land East of
Gloucester Road, Hardwicke Employment Hub**

Omissions Site

Rubicon Planning Ltd
Admin@rubiconplanning.co.uk

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1. Introduction.

- 1.1. These comments are submitted on behalf of Tritax Symmetry (Gloucester) Limited, in respect of land east of Gloucester Road, Hardwicke close to M5 J12 where it has an option agreement.
- 1.2. The land was assessed in the Employment Land Review March 2021. It was reported that
“although this land does link to St Modwen Park to the north it represents a more significant incursion into the countryside than land to the west. One option would therefore be to encourage the delivery of this land as a later phase of development, later in the Plan Period, once development to the north and west is complete and subject to evidence that demand remained strong at that time. The Council would need to gain the support of the developer to ensure the wider scheme was progressed as a multi-phase development. “
- 1.3. The recommendation was that Land East of Gloucester Road (15.80 ha gross) was excluded from allocation or held for the longer term. Ultimately, the site was not included in the Pre-submission Local Plan. These representations seek the safeguarding of Land East of Gloucester Road for development in the later part of the plan period subject to demand and subject to the environmental safeguards appropriate for this area.
- 1.4. The Local Plan Review acknowledges that the Hardwicke area has an important employment role: with three key employment sites nearby, and the Hardwicke Employment Hub is one of the District’s employment hubs.

- 1.5. Expected labour supply and labour demand job forecasts for the District suggest the need to plan for between 7,740 and 10,440 net new jobs (2020-2040) The Local Plan's development strategy will distribute at least 12,600 additional dwellings and 73ha of new employment land to meet needs for the next 20 years. The employment land seeks to provide space for jobs to meet increases in employment levels and the growth strategy.
- 1.6. The Secretary of State (SoS) has confirmed logistics development delivers a substantial range of tangible economic benefits including well paid jobs for local people and boosts the local economy.
- 1.7. The Local Plan underestimates the need for employment land across the plan period from within Stroud District and does not account for employment needs arising outside of Stroud District from within the Joint Core Strategy (JCS) Area (Gloucester, Tewkesbury and Cheltenham) or the rest of Gloucestershire.
- 1.8. While it is recognised the JCS area has constraints on land in its area, similarly Stroud District is constrained with much of the eastern half of the District falling into the Cotswold Area of Outstanding Natural Beauty (AONB), which covers just over 50% of the District's total land area. In addition, the western side of the District is constrained by the Severn Estuary and flood plain. The M5 Motorway passing between these two areas as does the A38 and Cross Country Main Line.
- 1.9. These comments support the requirement that the "Hardwicke Employment Hub" is recognised as a strategic location for employment development and that the land east of Gloucester Road is allocated as a future employment site.

2. Need for Employment Land

- 2.1. The need for employment land is fundamentally to create jobs and wealth in the local economy. Stroud has set itself a target of creating 10,440 new jobs over the 20 year life of the Local Plan Review. These jobs and the wealth they create are needed to support local services. In a recent appeal (APP/V4250/V/20/3253242) the SoS considered a similar logistics proposal would deliver a substantial range of tangible economic benefits including well paid jobs for local people and that these socio-economic benefits would boost the local economy.
- 2.2. The NPPF states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area. Planning policies should identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; as well as being flexible enough to accommodate needs not anticipated in the plan.
- 2.3. Paragraph 88 advises 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.
- 2.4. Planning Policy Guidance (ID: 2a-031-20190722) says that;

"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*
- *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)."

2.5. 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.

2.6. The Local Plan Review (para 2.6.1) says;

"The Council has a commitment to work closely with the business community to grow the local economy and increase employment."

Locally Objectively Assessed Need for Employment Land

2.7. It must not be forgotten that national guidance on meeting development needs applies equally to employment need as it does to housing need. Core Policy CP2 states,

"The Local Plan will meet the objectively assessed needs of the District by providing for the development of housing, employment, retail and other necessary development for the period 2020 – 2040.

The strategy for delivering the required [need] is to concentrate most development at a series of strategic locations, where housing, jobs and necessary infrastructure can be coordinated and delivered in a timely manner.

The strategic sites are located at the principal settlements within the District, at new settlements and within the key employment property market areas: south of Gloucester, Rail/M5/A38 Corridor, Stroud Valleys and Berkeley/Sharpness."

2.8. The Objectively Assessed Need for Employment Land is established by the Gloucestershire Economic Needs Assessment (2020) (GENA). The Assessment recommended that the Council should consider meeting two of the highest scenarios based on expected labour supply and labour demand growth scenarios. This results in the Local Plan Review supporting a net increase in "old" B

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– Class uses (B1, B2 and B8) of 73 hectares. It is said the assessment accounted for the effect of Brexit and Covid 19 (even though it was completed only 6 months into the Covid crisis).

- 2.9. The labour demand model used in the GENA follows a six step approach as commented on below.
- 2.10. The baseline data is from “BRES 2018” (presumably UK business register and employment survey). BRES 2018 released in 2018 reported provisional results from 2017, revised results 2016
- 2.11. As described in Section 10 of the GENA, total employment is then forecast to grow under three standard growth scenarios between 2021 and 2041 (2020-2040 for Stroud). It is not clear whether the baseline data has been projected forward to 2020/2021 before forecast growth rates applied. If not total jobs and predicted growth will be underrepresented. For Stroud growth in Distribution, Transport and Storage categories between 2020 and 2040 is estimated at 160 jobs which is 8 additional jobs per year across the sector. This seems unrealistically low.
- 2.12. The growth forecast makes adjustments in three sectors; manufacturing, electricity, gas and water, and ITC. Significantly the general decline in manufacturing is reversed based on growth in advanced manufacturing. However, as commented on below, despite the GENA claiming to have taken into account Brexit and the Covid 19 Pandemic no adjustments have been made to the growth in Distribution and Transport & Storage.
- 2.13. The NPPF also requires that strategic sites are identified so that the plan is flexible to meet need not anticipated.
- 2.14. The job growth is converted to full time equivalents (FTE) based on BRES data between 2015 and 2018. The jobs are then divided into use classes and a floorspace density applied using standard reference, the Employment Densities Guide 3rd Edition. B8 use is 77sqm per job. This floorspace is then converted to site areas using a standard plot ratio of 40%. Such that the need for 183 B8 Distribution jobs is the equivalent of 14,104sqm and a building of that size requires a site of 3.5ha.
- 2.15. The model then accounts for loss of employment floorspace estimated on past trends and forecast over the plan period. This loss is added back into the total requirement. In the case of Stroud and B8 uses 0.2ha or 200sqm per year over the plan period is expected to be lost. Again, this does not seem realistic, with the loss of secondary stock as market practise evolves.
- 2.16. The model does not account for further losses from the local employment stock due to the new flexibility in changes of use introduced by the E Class.
- 2.17. The model then adds a “margin of flexibility”;
 - To allow greater flexibility to support changing business needs;
 - To provide a choice of sites to facilitate competition in the property market; □
 To provide flexibility to allow for any delays in individual sites coming forward; □ The potential error margin associated with the forecasting process.
- 2.18. The margin of flexibility is taken as a typical 2-5 years worth of completions, in GENA a 5 year margin has been added, which for Stroud amounts to 4.0ha for B8 uses over the plan period, this is 2000sqm (0.2ha) per year. A concern with the model is with it basing projections on historic take up. In a further recent case, the SoS found that poor take up rates were due to qualitative and quantitative constraints on supply of employment land.
- 2.19. This then gives a total Employment (B Class) Land Need 2020-2040 for Stroud of;

	Stroud B8	Stroud
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Total Employment 2017 provisional	(not reported)	(not reported)
Forecast Employment Growth 2020-2040	143	4798
Conversion to site areas (ha)	-1.7 - 8.6	-30.6 - -0.8
Growth Scenario (ha)	8.6	27.6 - 29.9
Addition of forecast employment land loss (ha)	8.8	54.6 - 56.9
Addition for flexibility (ha)	12.8	69.4 - 71.7

- 2.20. An Objectively Assessed Need for B8 Employment floorspace of 12.8ha within Stroud District over the next 20 years, a rate of 0.64ha per year is inconceivable. The average B8 development of 200,000sqft requires a site circa 5ha. The total land supply over the plan period to meet Stroud's need and any need from neighbouring authorities would amount to just two standard B8 units.
- 2.21. In the case referred to above (APP/V4250/V/20/3253242) the SoS fond;
"an evident and compelling planning policy imperative for high-quality logistics floorspace regionally, subregionally and locally".
- 2.22. The lack of employment land is likely to result in valuable investment flowing into adjacent authorities to the detriment of local residents and existing businesses wishing to expand would continue to leave to find more suitable premises.
- 2.23. The local plan evidence base and public consultation highlighted 40 key issues, challenges, and needs facing the District, which the Local Plan should seek to address. These include working with neighbouring authorities to meet the needs of the housing market area as a whole. Working to meet the needs of the Functional Economic Market Area should also be included as a key issue in respect of the economy. This is addressed as a Key Issue in respect of Delivery (Key Issue 34).
- 2.24. The forecast model assumes all identified employment land is brought forward for employment use over the plan period. A flexibility margin of only 25% is very small and the supply target assumes all allocated sites come forward and deliver the quantum of floorspace identified. While the margin of flexibility includes an allowance for changing business needs, employment densities for B1a, B1b - B2, are 10-13 and 36-60 sqm per job respectively and B8 densities are taken as at least double that. If more of the limited supply of employment land is taken up as B8 the jobs target will not be achieved.
- 2.25. There are some serious concerns whether the eight allocated sites will deliver the levels of employment land in the right places to meet the need to provide for new jobs in the district whether this is the local need for a minimum of 10,440 jobs or to meet the wider need.
- 2.26. There does not seem to be 7ha of vacant or undeveloped land at Sharpness Docks to make a 7ha net addition to supply. Sharpness, Stonehouse and Wisloe are part of larger housing led mixed use schemes so that the delivery or viability of an employment component is doubtful. Similar strategic allocations in the JCS area have failed to deliver any employment land. Renishaw New Mills is the HQ of one of the world's leading engineering and scientific technology companies, with expertise in precision measurement and healthcare. The business occupied a former ice-cream factory in Wotton-under-Edge 1976, its first dedicated facility and has extended from this property. Other than an expansion of the existing building or a science park development associated with Renishaw it is difficult to see how this site would deliver the jobs earmarked for it. The isolated nature of the site means it would only be

attractive to niche business and also leads to development constraints These constraints are; requiring a high quality ‘campus’ style development retaining open spaces, re-use the farm buildings of heritage value and include new buildings sited so as to minimise any potential impact upon heritage assets and key views of and from the AONB.

Wider Gloucestershire Need for Employment Land.

- 2.27. The Local Plan Review and evidence base is clear that the employment land identified in the plan is to meet only the needs of Stroud District. Unlike housing land no provision is made to address the unmet need of Gloucester City, the JCS area or other districts.
- 2.28. The GENA states at paragraph 0.10 that the six Gloucestershire Authorities can be considered to form a single Functional Economic Market Area.
- 2.29. Paragraph 1.10 of the Local Plan Review states;
“Local planning authorities are expected to work collaboratively with other bodies to ensure that strategic priorities are properly co-ordinated across administrative boundaries. Joint working is expected between neighbouring authorities to enable local planning authorities to meet development requirements which cannot wholly be met within their own areas.”
- 2.30. PPG (ID: 2a-025-20190220) says,
“Functional economic market areas can overlap several administrative areas so strategic policy-making authorities may have to carry out assessments of need on a cross-boundary basis with neighbouring authorities within their functional economic market area.”
- 2.31. In respect of housing development paragraphs 2.32-2.34 of the Local Plan Review specifically address
“Meeting Gloucester’s Needs” these paragraphs state;
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 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 needs.
An assessment of potential alternative sites to meet Gloucester’s long term housing needs has identified that certain locations within Tewkesbury Borough and Stroud District at the Gloucester fringe are functionally related to Gloucester and offer the potential to meet Gloucester’s needs in accessible locations.
At this stage, pending further work on the Joint Core Strategy Review, a site at Whaddon is safeguarded in the Local Plan to contribute to meeting Gloucester’s needs.”
- 2.32. Paragraph 2.61 confirms that in addition to meeting Stroud’s housing needs, the Local Plan addresses unmet needs from neighbouring Gloucester by allocating a site of 73ha for 3,000 dwellings at Whaddon for delivery by 2040
- 2.33. The JCS area is not merely deficient in suitable land to meets its own housing growth needs it is deficient in suitable land to meet all its development needs including housing needs and other economic, social and environmental priorities.
- 2.34. Policy SP1 of the adopted JCS says that during the JCS plan period (2011-2031) provision will be made for 192 hectares of B class employment land which will be brought forward to support 39,500 jobs. Policy SP2 says that at least 84 hectares of this total will be on strategic sites. This provision is not strategic employment (other than West Cheltenham) it is simply local employment land on strategic housing sites; and to date none of this employment land has come forward to create any of the 39,500 jobs anticipated. The JCS says,

“Economic growth has been planned for at the JCS-wide level as a functioning economic area. The LEP strategy for economic growth, as set out in the Strategic Economic Plan, is focused on the M5 growth corridor running through the heart of the JCS area and not any particular authority. Therefore economic growth needs to be seen in the JCS area-wide context. This is a different approach from housing where each district has its own specifically assessed needs and requirements.” (Para 3.1.13)

- 2.35. Having progressed the three district plans to at least examination stage the position on delivery of employment land is as set out below,

	JCS	Actual
Strategic Allocations	84ha	47ha
Existing undeveloped capacity		
□ previous allocations	39.9ha	10.4ha
□ extant planning permissions	32.3ha	10.2ha
Allocations coming forward	36ha	
□ Cheltenham Borough Council		4.4ha
□ Tewkesbury Borough Council		46.5ha
□ Gloucester Borough Council		8.6ha
Total	192ha	127.1ha
Shortfall		64.86ha

- 2.36. The JCS Authorities are preparing to update the JCS and will need to not only address the c60ha shortfall in provision from the current plan, which is to meet the needs based partly on housing growth from that plan not yet provided, but also additional employment for future planned growth. On the basis that the existing JCS could not meet all of its development land needs it must be the case that the JCS Review will also look beyond its boundaries to meet further needs. Given that the built up area of Gloucester City extends into Stroud at Quedgeley and that Stroud are making provision of 73ha to meet Gloucester’s housing need at Whaddon it follows that land around J12 which is part of the Gloucester urban fringe be considered to meet the needs of Gloucester and the JCS for further employment land.

- 2.37. The JCS review is behind that of Stroud District with a Regulation 18 Plan expected at the end of 2021 with the possibility of a Regulation 19 Plan prior to the examination of the Stroud Local Plan Review. The approach to Whaddon reflects this, pending further work on the Joint Core Strategy Review, a site at Whaddon is safeguarded in the Local Plan to contribute to meeting Gloucester’s needs.

Changes in Employment Market

- 2.38. The OAN for employment land was published in August 2020 and used employment base data from 2017. While the GENA took account of Brexit and Covid 19 the UK voted to leave the EU in 2016 and officially left the trading bloc on 31 January 2020 with a new trade deal agreed on 24 December 2020. The effects of the Covid 19 pandemic began to be felt on the economy in Spring 2020 and will continue for many months if not years. In August 2020, 5 months into the pandemic the length and impact on attempting to contain the virus could not have been anticipated nor indeed its effect on industry. These effects have varied widely across sectors and the warehousing and distribution sector has been particularly effected due to a greater reliance on on-line shopping and disruption to free flow of goods due to Covid and Brexit.

- 2.39. In June 2021 Colin Chick Executive Director, Gloucestershire County Council reported to the GEGJC that,
- “Since the beginning of the pandemic however, the county has seen unemployment increase from 2.0% in March 2020 to 4.5% in April 2021. This is coupled with 38,600 employments furloughed in March 2021 and a total of 20,500 claims against the government’s Self-Employment Income Support Scheme (SEISS) as at January 2021. This is equivalent to 13.7% of employments (furlough) and 60% of the eligible cohort (SEISS). Finally, the Claimant Count in Gloucestershire sits at 16,985 which represents a rate in January of 4.4%.”*
- 2.40. In a recent SoS Call In decision (APP/N4205/V/20/3253244), he agreed with his Inspectors analysis of need including;
- “Information from the British Property Foundation (BPF) confirms a widely held view that rapid growth being experienced in the logistics sector of the UK has been due to structural changes to high street retailing and a commensurate growth in e-commerce. This shift has been accelerated by the ongoing Covid19 pandemic restrictions on personal movement.*
- The warehousing and logistics sector has proved resilient in the current pandemic. It is therefore to be expected that this sector will be instrumental in the post-pandemic recovery of the wider UK economy.”*
- 2.41. UK online sales have risen steadily over the last 10 years and at the start of 2020 reached 21% of all retail sales. The impact of Covid-19 has seen this rise to 33% of all sales. Forecasts suggest that the level of online retail post Covid-19 will continue to rise and reach 36% of all retail by 2025 (Savills May 2021 Property Market Overview).
- 2.42. Major manufacturing take-up has driven logistics supply chain requirements. Based on the long term average, manufacturers account for 24% of all of the new leases signed for warehouse space in the UK. Research from Savills suggests that for every £1bn of manufacturing investment an additional 175,000 sq. ft. of warehouse space is required. According to the Institute for Supply Management’s July survey, 20% of firms are planning or have already begun to re-shore or nearshore some operations meaning manufacturing related take-up is expected to rise accordingly.
- 2.43. The rise in online retail has stimulated the need for “last mile” deliveries with a consequent dramatic increase in demand for smaller units on the edge of conurbations. Van registrations have risen 107% in ten years. As online sales and van registrations increase the level of last mile facilities required will also rise.
- 2.44. Supply chain disruption is boosting demand; 2020 and the start of 2021 have seen unprecedented disruption in global supply chains. Logistics companies, retailers and manufacturers are mitigating for this by increasing inventory levels closer to home. In 2019 companies making provisions for stockpiling and supply chain disruption accounted for 30% of all of the new space taken, up from a long term average of 22%. A recent survey undertaken by Savills (with partners) identified that 55% of occupier respondents expected to take more warehouse space as a result of Brexit and other supply chain disruption.#
- 2.45. The Local Plan Review (paragraph 2.6.3) says that a review of employment land requirements will be necessary once the full implications of Brexit and Covid-19 become apparent.
- 2.46. The GENA forecast for B8 employment land starts from a decline in employment in Transportation and Storage in the OE statistics and a growth of just 35 jobs a year in Distribution in CE forecasts.
- 2.47. We believe, therefore the GENA significantly underestimates the amount of employment land needed to be identified in Stroud to provide a sustainable local economy. The under provision of employment will result in an imbalance between housing and population and employment opportunities which the local plan is seeking to avoid. It will also result in increased out commuting

from Stroud to areas with higher employment opportunities increasing traffic and CO2 emissions. The lack of employment land will also not allow a balanced economy with a range of symbiotic business. Logistics, Warehouse and Distribution are a critical component of the manufacturing process and which also reduces vehicle miles of goods if they are distributed close to the point of manufacture. Para 1.11 of the Local Plan Review states that Stroud has low levels of unemployment, but too few jobs available within the District itself – leading to high levels of out-commuting.

- 2.48. Core Policy CP11, New employment development, states that permission will be granted for industrial or business development, recognising the specific locational requirements of different sectors, provided that the proposals would, inter alia, demonstrate how the principles of industrial symbiosis have been taken into account.
- 2.49. The local plan evidence base and public consultation highlighted 40 key issues, challenges and needs facing the District, which the Local Plan should seek to address. The issues include ensuring that the local economy can respond positively to challenges and any new trading opportunities following Brexit. The Key Economic Issues need to include building back the economy following the Covid crisis and this will include making further provision for employment land.
- 2.50. Strategic Objective SO2; Local economy and jobs, provides for a strong, diverse, vibrant local economy that supports existing businesses and encourages new enterprise – enabling balanced economic growth, coupled with enhancing skills and job opportunities across the District.
- 2.51. Section 2.6, Local economy and jobs, states;
“The development strategy needs to ensure that sufficient employment land is provided to meet the future needs of business and balance the planned housing growth.”
- 2.52. The Employment Land Review identified occupancy rates well above 90% for industrial space suggesting an existing undersupply of premises against demand. Key markets identified included a focus of industrial and warehousing development at Quedgeley, Hardwicke and M5 Junction 12.

Suggested Changes

- 2.53. Increase employment land provision for Stroud from 73ha to 198ha
- Include a further 27ha to allow for non-delivery of allocated sites, sites not providing the projected number of jobs anticipated, loss of employment sites to other uses.
 - Include sites for JCS, Gloucester City/JCS, the area is so constrained it requires 73ha of land to be provided in Stroud for its housing growth. A similar area should be identified to meet Gloucester City/JCS employment needs.
 - The existing eight allocated sites will not provide the required employment land so that a further 25ha needs to be identified.
- 2.54. 198ha of new employment land should be identified to meet the needs of Stroud and un met need of surrounding Districts.

Baseline Need	73ha
Additional for greater flexibility	27ha
JCS Need	73ha
Shortfall on Proposed Sites	25ha
Total Need	198ha

- 2.55. Working to meet the needs of the Functional Economic Market Area should also be included as a key issue in respect of the economy. This is addressed as a Key Issue in respect of Delivery (Key Issue 34).
- 2.56. The Key Economic Issues need to include building back the economy following the Covid crisis and this will include making further provision for employment land.
- 2.57. In respect of housing development paragraphs 2.32-2.34 of the Local Plan Review should be amended to state;

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 and employment 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 needs.

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

At this stage, pending further work on the Joint Core Strategy Review, a site at Whaddon is safeguarded in the Local Plan to contribute to meeting Gloucester's housing needs and a site at Hardwicke Employment Hub safeguarded in the Local Plan to contribute to meeting Gloucester's employment needs.

- 2.58. The Vision needs to include a Vision for the Stroud economy so that sufficient land is available in the right places to meet sustainable development needs of the district and surrounding areas.

3. Junction 12 M5 Motorway Context

- 3.1. The M5 Motorway passes through the district between the AONB and Severn Estuary. Junction 11a lies to the north of the district boundary and J14 to the south. The role the M5 plays in the economic and social life of the district needs to be reflected in Section 1.1 of the Local Plan Review, District Context. Indeed, the M5 Corridor and its junctions form a distinct character area separate from the "parish clusters". While the parish clusters have their own unique qualities, they also share common features which are distinct from the M5 Corridor and its junctions.
- 3.2. Para 1.1.12 of the Local Plan Review recognises there is significant growth occurring along the M5 corridor (focused on Gloucester, Cheltenham and Bristol) – which impacts on Stroud District now and in the future. One of the priority issues identified having taken into consideration local views, national policy and evidence where available, is ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by concentrating employment growth within the A38/M5 corridor.
- 3.3. The development strategy includes further strategic employment growth being concentrated at accessible locations within the Cross Country Rail/A38/M5 corridor. Paragraph 2.3.18 states the strategy envisages "*a focus on employment growth at Quedgeley East / Javelin Park;*"
- 3.4. Strategic Objectives include, SO2, Local economy and jobs, where the development of employment sites in the M5/A38 corridor will mean that development can be located close to strategic road and rail networks and in places that business wants to be. It will create the opportunity to provide a range of units from large warehousing and distribution units down to offices and smaller industrial units,

possibly as start-up businesses. Planning for employment together with housing also provides the opportunity for residents to work locally and to reduce out-commuting levels.

- 3.5. Paragraph 2.6.5 confirms one of the six key segments of market demand that has been identified is 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. The Local Plan Review goes on to state (para 2.6.8) that the plan seeks to provide for new employment land and support existing employment areas located at the key employment property market areas identified in the ELR: south of Gloucester; within the M5/A38 corridor. Also acknowledging (para 2.6.10) there are particular opportunities associated with developing new modern business park premises at Javelin Park.
- 3.6. The employment strategy includes therefore to deliver economic growth and additional jobs on and adjacent to existing high value employment sites and within the M5/A38/rail growth corridor through new employment sites of varying sizes and locations to meet the specific locational requirements of different sectors.
- 3.7. Core Policy CP3 refers to the district's settlement hierarchy where proposals for new development should be located in accordance with the District's settlement hierarchy. This will ensure that development reduces the need to travel and promotes sustainable communities, based on the services and facilities that are available in each settlement. While we do not disagree with this approach and support the principle it is considered that at least Junction 12 of the M5 should be identified as a strategic growth and development location. Core Policy CP2, Strategic growth and development locations, only identifies specific development sites and the settlement hierarchy. Junction 12 is, as a matter of fact and principle, a strategic development location and should be identified as such alongside the settlement hierarchy subject to appropriate provisions.
- 3.8. Junction 12 is recognised as being part of Gloucester's urban fringe and a key location for employment development. The Local Plan Review needs to acknowledge that Gloucester City is an important settlement for sustainable growth of Stroud District with the residential extensions of southern Gloucester being in Stroud District.
- 3.9. Core Policy CP4 is concerned with place making and the spatial vision for Stroud. It is felt this Vision is overly concerned with residential place making and does not account for development characteristics of employment uses. As such it does not provide an appropriate place making vision for employment sites. As set out above the Vision needs to specifically refer to the Economic development of the district; this would then tie into Policy CP4 tailored to specifically refer to Employment development.
- 3.10. While we do not disagree with the principles of CP4 they do not fit with employment development and do not seem to be written with employment uses in mind. As an example, proposals are expected to integrate into the neighbourhood, support community services and meet employment requirements in terms of mix, tenure and type.
- 3.11. CP4 also sets out the "mini-visions" for parish clusters referred to in the Vision which is addressed below.
- 3.12. Core Policy CP5 needs to be clear that in addressing development principles for strategic sites the policy as a whole addresses residential and non-residential sites. The first five bullet points include requiring the provision of community facilities which is not normally expected on employment sites. The second paragraph refers to applications for strategic sites – both residential and non-residential. The numbered bullet points need to be relevant to employment sites.

- 3.13. Chapter Three of the Local Plan Review addresses the spatial vision for the eight parish clusters. Junction 12 lies in what the Plan describes as Gloucester's rural fringe. In respect of the adjacent EFW facility at Javelin Park (APP/T/A13/2200210) the Secretary of State took the view that the characterisation of the area is "urban fringe" that has been advancing into the Vale landscape over a period of at least 40 years and it is planned to continue that progress. Whilst the area is partly greenfield at present its significance is its relationship to the urban area of Gloucester City and the motorway. It would be more sensible to include this area, excluding the area generally south east of the motorway and railway line within the AONB, as Gloucester's Urban Fringe and address the rural area beyond this separately as these are distinct separate areas.
- 3.14. The development strategy for the area in the Local Plan Review has a particular focus on employment growth and includes some large strategic site allocations. This approach is only applicable to the urban fringe and not the area within the AONB. Paragraph 3.4.2 says that at the urban fringe, with the exception of employment development at Junction 12, the motorway will represent a distinct and defensible limit to southerly expansion. In terms of employment expansion the extent should be defined by the Cross Country Line with strategic buffer landscaping.
- 3.15. In respect of guiding principles (para 3.4.5) reference needs to be made to the guiding principles for employment development in the urban fringe and that J12 will continue to be a focus for large scale employment development (or that the Hardwicke employment hub includes J12) with land safeguarded for future employment needs of the district or adjoining areas, and that employment will be contained by the Cross Country Line. The Hardwick Employment Hub has a recognised important role in the District.
- 3.16. Core Policy 11 is concerned with economic growth and strategic employment needs. The Local Plan review says that,

"it is important to ensure that strategic housing growth is coupled with the delivery of significant employment development of the right type to help improve self-containment of communities. Policies for employment development in the Local Plan will have regard to both strategic and local business needs, and will aim to facilitate a flexible supply of land moving towards a low carbon economy. They will aim to both increase the number of jobs available locally that are currently lower than the number of available workers and provide for jobs that more readily match the broad skills of the workforce. Too few jobs and provision for a lower skill base are factors that have led to considerable movement of higher skilled workers out of the District to other places of employment. The District already has a reputation for advanced engineering, green technologies and creative skills that should be built upon. Further sites in locations that are accessible to the existing and proposed labour supply are proposed, but with a focus on urban areas in order to help reduce out-commuting from the District."

"The area requires more jobs and the more intensive use of much of this land for higher density employment development, coupled where appropriate with enabling development and environmental improvements, complements the overall strategy for growth."

Suggested Changes

- 3.17. The role the M5 plays in the economic and social life of the district needs to be reflected in Section 1.1 of the Local Plan Review, District Context.
- 3.18. Junction 12 of the M5 should be identified as a strategic growth and development location.
- 3.19. The Local Plan Review needs to acknowledge that Gloucester City is an important settlement for sustainable growth of Stroud District

Comments to Stroud District Local Plan Review

- 3.20. The Gloucester Urban Fringe should be considered as a separate character cluster
- 3.21. Development south of the M5 should be allowed for employment development
- 3.22. the Vision needs to specifically refer to the Economic development of the district; this would then tie into Policy CP4 tailored to specifically refer to Employment development.
- 3.23. The following changes are suggested to make policy CP5 more inclusive, 3.24. Strategic sites will:
1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms
 2. Be low impact in terms of the environment and the use of resources
 3. Be readily accessible by bus, bicycle and foot ~~to shopping and employment opportunities, key services and community facilities~~; and will contribute towards the provision of new sustainable transport infrastructure to serve the area, in seeking to minimise the number and distance of single purpose journeys by private cars
 4. Have a layout, access, parking, landscaping, and ~~community other~~ facilities in accordance with an approved indicative masterplan
 5. Be located to achieve a sustainable form of development and/or support regeneration. Development proposals should incorporate a negotiated ~~masterplan design code/framework~~.
- 3.25. The urban fringe, including the Hardwick Employment Hub and development at Junction 12 should be recognised as a separate character area, in terms of employment expansion the extent should be defined by the Cross Country Line with strategic buffer landscaping.
- 3.26. In respect of guiding principles (para 3.4.5) reference needs to be made to the guiding principles for employment development in the urban fringe and that J12 will continue to be a focus for large scale employment development (or that the Hardwicke employment hub includes J12) with land safeguarded for future employment needs of the district or adjoining areas, and that employment will be contained by the Cross Country Line.
- 3.27. Further development at the Employment Hub would need to adopt provisions placed on existing commitments for;
- Development will need to include a high quality of design
 - Strategic landscaping buffer
 - Development will need to ensure that the scale and bulk of buildings, the visual gap and the nature and extent of strategic landscaping, protect the heritage assets and their immediate settings and wider views from the AONB escarpment.
 - Development will be required to provide sustainable transport measures and necessary improvements to the existing highway network.
 - A 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.

4. Land East of Gloucester Road, Hardwicke Employment Hub

4.1. Tritax Symmetry (Gloucester) Limited's land east of Gloucester Road, Hardwicke close to M5 J12 should be allocated in the Local Plan Review to meet the development needs of the District and wider area. Given the single FEMA we do not see a need to apportion sites to meet either Stroud or Gloucester's need. If insufficient land is identified to meet employment growth for Gloucester or elsewhere then jobs created could be lost which are needed by Stroud. The allocation should reserve the site to meet need arising in the later part of the plan period and would be subject to appropriate policy requirements to address site specific issues.

4.2. The Employment Land Review (page 156) describes the site as;

"Colethrop Farm is owner of the site (Tritax Symmetry have an option). Area of greenfield agricultural land south of Javelin Park and identified as part of a larger logistics scheme. Tritax is proposing Symmetry Park across the combined total area of Javelin Park and the east/west of Gloucester Road.

East of Gloucester Road = 82,000 sqm. Three units of 6,689-24,387 sqm

No defined timetable for delivery but feel they could develop rapidly.

Constraints:

- *Trees on site*
- *Tritax are presently commissioning a range of site studies to confirm any physical, environmental, etc. constraints in advance of the Local Plan Examination in Public.*

Key Access Issue - With the consent at Quedgeley East (St Modwen Park) there is now a capacity issue at J12, M5. Further, development will trigger the requirement, from Highways England, for a major investment and upgrading of the junction. This will cost in excess of £25 million. Highways England are considering potential upgrades to both junctions 12 and 14, which could under certain circumstances include interim solutions to allow some development, provided they do not prejudice the delivery of a wider scheme. Once the Council know the overall impacts of the Local Plan growth on these junctions it will be agreeing with Highways England a way forward, which is likely to include major bids for Government funding, so the full costs will not fall on developers. As of yet there have been no discussions with developers about what they will need to contribute or how costs could be apportioned between schemes."

4.3. Tritax Symmetry are now treating the site as separate to the allocated PS43 West site, both sites could come forward independently and potential demand supports a strategy of a two phase approach subject to allocation and planning permission with the east site being a future second phase. Subject to allocation and planning permission the site could be delivered without any significant delay. Tritax Symmetry only pursue planning permissions where there is potential demand and would undertake site preparation once consent has been achieved. Often they will speculatively develop at least one building so as to provide the market with one instantly occupiable building and have land available for any specific occupier needs.

4.4. Tritax Symmetry have produced a Delivery Document setting out the Vision for the site having considered all constraints to development to assure themselves and the local planning authority that the site is suitable and deliverable for the proposed B2/B8 use. This has been previously submitted to the local planning authority and further copies are attached to these comments.

- 4.5. The Delivery Document considers traffic impact and potential works to the motorway junction. As part of the preparation of the planning application for the West site; detailed discussions with Highways England have been carried out including using the HE Paramics model to assess impact on the junction and necessary short term and long term mitigation. The off-site highway works necessary to bring the east site forward are understood and included in the financial model.
- 4.6. In terms of market segments met and evidence of deliverability for the site the Employment Land Review states;

“Motorway linked larger industrial/warehouse units, serving the wider Gloucestershire/regional market.

Land is under the control of an experienced developer of larger B2/B8 schemes and via the B4008 enjoys good access to the wider, and growing Quedgeley/Hardwicke/Junction 12, M5 cluster which is growing and has proven it can attract occupiers from across the county and beyond.

The larger scheme will also generate greater a capital receipt allowing it to make a more significant contribution to the Junction 12 and 14 improvement requirements, should this be needed.

There is a strong and ongoing demand for mid-box units in the M5 Corridor, to meet the specific growth requirements of Gloucester companies and to bring in regional/national investment. Logistics demand has only been strengthened by the increase in e-commerce from the Covid-19 related lockdown and there is no sign of demand slowing in the medium-long term. With St Modwen rapidly progressing development to the north, there is a need to look for further/longer term allocations for Quedgeley/Junction 12, M5.

Although this land does link to St Modwen Park to the north it represents a more significant incursion into the countryside than land to the west. One option would therefore be to encourage the delivery of this land as a later phase of development, later in the Plan Period, once development to the north and west is complete and subject to evidence that demand remained strong at that time. The Council would need to gain the support of the developer to ensure the wider scheme was progressed as a multi-phase development.”

- 4.7. In the Inquiries referred to above the SoS found;

“it is material that the site is available now and that the detailed element of the scheme can be delivered relatively quickly to address known commercial and policy needs.”

- 4.8. In respect of any incursion into the countryside it is recognised the East site has different constraints as the West site and it would be expected that different parameters would be set for each site. As referred to above the East site would form a future phase of development once the West site is fully committed and subject to evidence of unmet need arising in the area.
- 4.9. In summary the Employment Land Review, having identified all potential land chose to recommend excluding the East site “Adjustment 8: Possible Further Reduction – Reduced Area to Symmetry Park to minimise incursion into the countryside” and for “Land East of Gloucester Road – 15.80 ha – excluded from allocation or held for the longer term.”
- 4.10. The review concludes in respect of the East Site;

Finally, it is noted that a sizable portion of the development land, 51.40 ha on a net basis, is proposed on greenfield land south of Junction 12, M5 at Quedgeley/Hardwicke. This would be reflective of demand patterns which show the Junction 12 area to be a focus for industrial and warehouse growth, not just for Stroud District but for Gloucester as well and also serving a wider sub-regional/regional motorway-linked market. There has been a steady development of B2/B8 premises in the area since 2006 with no sign of demand slowing here.

Indeed, a growing e-commerce market during the 2020/21 Lockdowns suggests logistics demand will increase further in the short-medium term. Larger strategic developments will also be more able to contribute financially to major highway upgrades at Junction 12.

However, if the scale or nature of the proposed development was judged too large an incursion into the countryside, one option would be to look at a more limited development of Symmetry Park, focused only on land west of Gloucester Road, allowing the development of an expanded Javelin Park site on land south of the Energy from Waste Plant. Land East of Gloucester Road, a more significant incursion into the countryside, would either be excluded from allocation or held as a longer-term growth option. Even with this exclusion, 35.60 ha of employment land would remain in the Quedgeley/Hardwicke area.”

- 4.11. The Local Plan Review and Evidence Base documents support the principle of this location, within the motorway corridor and practically adjacent to a motorway junction, for employment use.

Suggested Changes

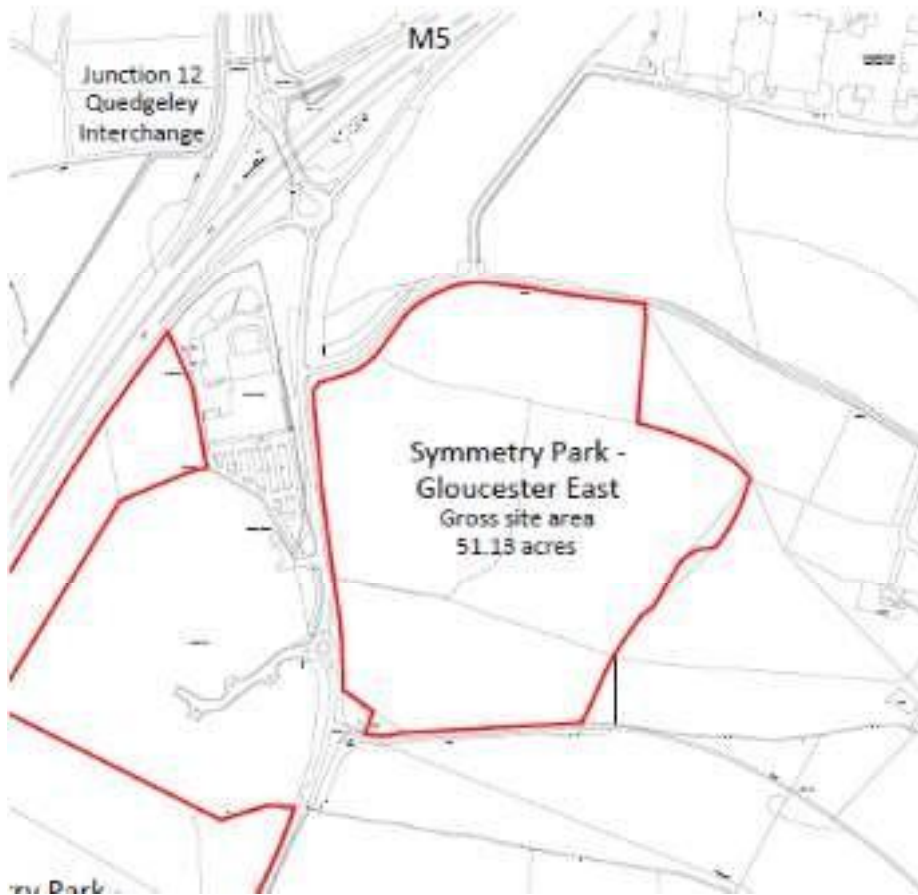
- 4.12. Tritax Symmetry (Gloucester) Limited’s land east of Gloucester Road, Hardwicke close to M5 J12 should be allocated in the Local Plan Review to meet the development needs of the District and wider area. The allocation should reserve the site to meet need arising in the later part of the plan period and would be subject to appropriate policy requirements to address site specific issues.

5. Summary

- 5.1. “There is a clear link between homes and warehousing, both in terms of quantum and location, which must be recognised in policy. Households generate demand for goods of all types, from cars to carpets to coffee to clothes. In turn car manufacturers require component parts; cafes require coffee bean deliveries and so on. Logistics is the sometimes invisible but always essential tie between demand and supply within the economy. Without it we would be running on empty - without cars or coffee.
- 5.2. As the population grows and more homes are delivered across the country, additional space for the required logistics response will be needed to meet consumer demand. Logistics should be a central consideration when planning for sustainable communities.
- 5.3. There is presently 69 sqft of warehouse floorspace for every home in England. If this relationship were to continue this would mean 21 million sqft of additional warehouse floorspace is required each year to match the Government’s annual target of 300,000 new homes. This is equivalent to 280 football pitches each year.” *
- 5.4. The Local Plan Review only allocates sufficient land to meet the Districts own employment need
- 5.5. Expected labour supply and labour demand job forecasts for the District suggest the need to plan for between 7,740 and 10,440 net new jobs (2020-2040) this equates to 73ha of employment land.
- 5.6. Further land should be allocated for employment uses to address growth in all sectors including logistics/distribution, and a larger margin for flexibility, an allowance should be made to meet the needs of surrounding areas of the same magnitude as is made for housing and the allocated sites will not generate the new jobs anticipated over the plan period and further sites should be added to meet this shortfall.
- 5.7. The Local Plan Review needs to allocate 198ha of additional employment land including land to meet the needs of the surrounding districts and demand later in the plan period.
- 5.8. Land east of Gloucester Road is suitable to meet the need for additional employment land subject to appropriate safeguards.

* What Warehousing Where? Understanding the Relationship between Homes and Warehouses to Enable Positive Planning - A Report for the British Property Federation

Appendix 1 Location Plan



Appendix 2 Delivery Document

(separate)

