



# Stroud Local Plan Review Examination



Hearing Statement Matter 8 Employment Provision



**Boyer**

## Report Control

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# 1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Eastington Parish Council in response to the Inspectors' Matters, Issues and Questions relating to the Stroud Local Plan examination.
- 1.2 This Hearing Statement relates to Matter 8 Employment Provision. It is to be read in conjunction with the representations previously submitted throughout the plan making process.
- 1.3 By way of background, in April 2022 EPC objected to the revised Outline Planning Application S.22/0206/OUT for the proposed Eco-Park development on land at M5, Junction 13, West of Stonehouse, Eastington, Gloucestershire. The Outline application remains pending determination.
- 1.4 Overall EPC have concerns relating to the site-specific assessments undertaken as part of the ELR as they are insufficient in detail which in turn results in the findings of the ELR being unjustified. The ELR (EB30) methodology for site suitability does not align with the methodology outlined in the SALA (EB18) and as a result the site selection process is not considered to be sound.

## 2. MATTER 8: EMPLOYMENT PROVISION

2.1 On behalf of Eastington Parish Council (EPC), we have provided a response to the Inspectors' Issues, Matters and Questions below.

**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?**

***2. Is the methodology on assessing employment land supply in the ELR justified and consistent with national policy and guidance?***

2.2 Eastington Parish Council (EPC) believe that the methodology on assessing employment land supply within ELR (EB30) is lacking sufficient detail within the Site Assessments. As a result, EB30 is not justified in accordance with paragraph 35(b) of the NPPF and is not considered to be sound due to lack of detail which fed into the overall findings of the assessment.

***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)?***

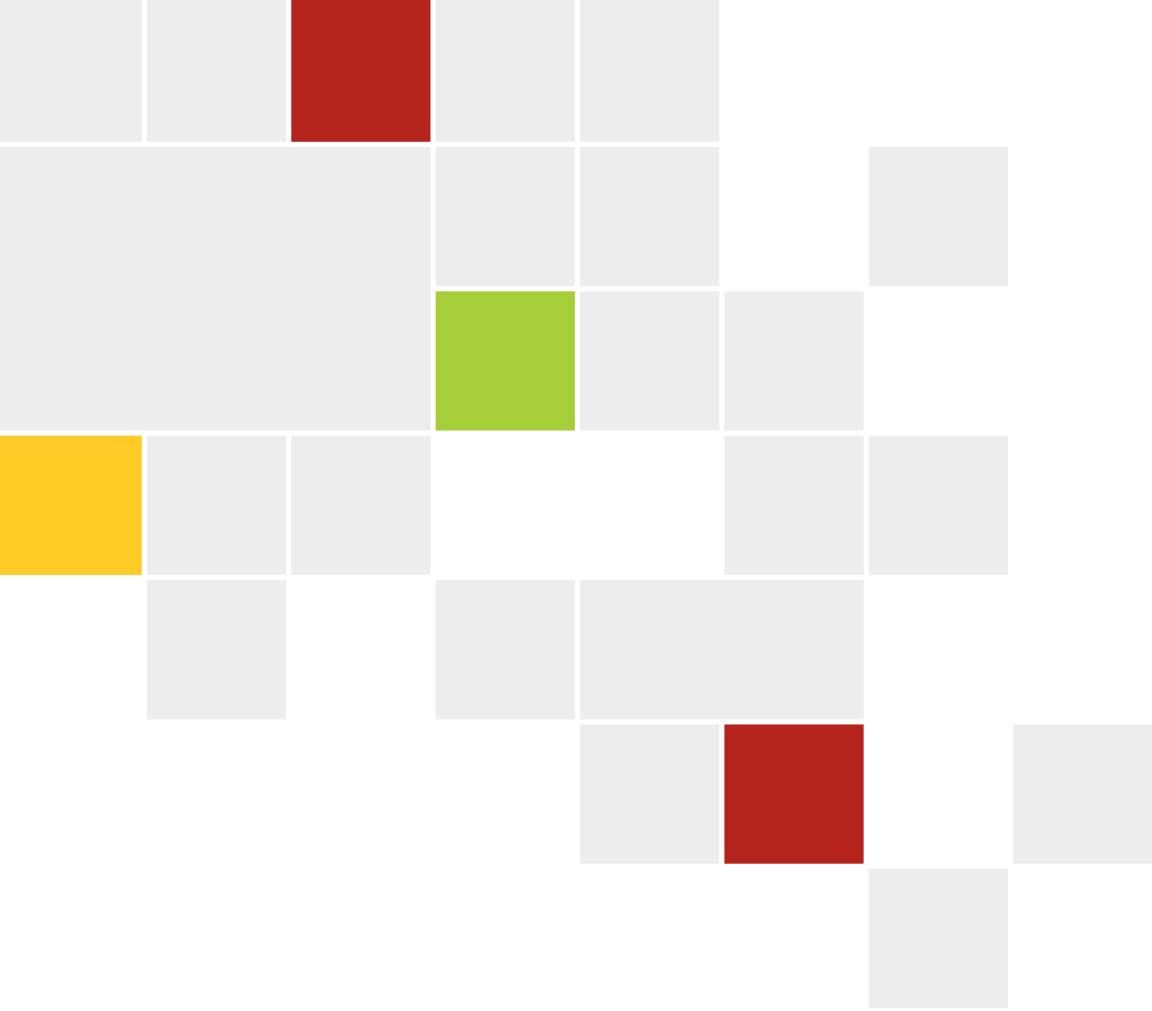
2.3 EPC do not consider that the Council's ELR methodology for site assessment and selection aligns with the SALA (EB18) methodology.

2.4 EB18 states that site suitability is guided by the adopted Local Plan, National Policy, existing land use allocations and policy area boundaries. In respect of site suitability, the following is considered:

- Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- Potential impacts including the effect upon landscape features, nature and heritage conservation, and impact on the existing transport network (including rail);
- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas; and
- Environmental/ amenity impacts experienced by would be occupiers and neighbours.

2.5 The ELR (EB30) Appendix 5 confirms the Site, Area Scoring System and states that this is based on site location and access; planning status; site conditions; and availability. The description of each of these however, is inadequately vague and does not entail precisely what constraints are considered. It is our view that the site assessment proformas associated with the ELR fail to provide sufficient level of detail in their site assessment for the following reasons:

1. There is no definition given to the location types used.
  2. Whilst some consideration has been given to physical limitations in a broad sense there is insufficient detail provided.
  3. There is limited specific commentary on potential impacts of each site, particularly a failure in some instances to set out the effects on landscape, nature and heritage conservation and existing transport network.
  4. A complete lack on environmental/amenity impacts experience by occupiers and neighbours of each site assessed.
  5. Finally, no consideration appears to have been given to the relevant policies set out in the made Neighbourhood Plans which forms apart of the adopted Development Plan.
- 2.6 In respect of site PS20, the site assessment methodology fundamentally fails to consider the constraints and designations set out within the made Eastington Neighbourhood Plan and the ecological constraints that have been identified. The proposed allocation lies within an identified wildlife corridor and orchard as shown within the NDP Proposals Map which, in accordance with NDP Policy EP2, should be protected and enhanced.
- 2.7 In accordance with the adopted Stroud Local Plan Policy ES8, community orchards should be protected and development which would lead to an unacceptable loss of a community orchard will not be permitted. Whilst the ELR makes some reference to “made” NDPs, Table 35 (Summary of Employment Sites Assessment) does not acknowledge these ecological constraints and these constraints are also not set out within the site proforma at Appendix 5. The site assessment methodology is therefore not robust and cannot be considered sound in the context of NPPF, paragraph 35.



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