

EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

Response of Tritax Symmetry (Gloucester) Limited

Matter 1 Compliance with statutory procedures and legal matters

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Issue 1.1 – Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004?

1.1 In respect of employment land provision, the Stroud Local Plan only seeks to meet employment needs of Stroud District. This is unlike housing provision where land at Whaddon, G2, is allocated to meet the needs of Gloucester.

1.2 In respect of meeting the employment needs across the wider area the Duty to Cooperate Statement October 2021 (Ref EB3) states,

“The main purpose of Gloucestershire Economic Growth Joint Committee (GEGJC) is to make sure the seven Councils co-ordinate their efforts in support of the Strategic Economic Plan (SEP) and the Growth Deal and this includes joint working on the co-ordination of strategic planning activities and infrastructure planning.” (Para 3.8)

“The District Council has input positively into the contents of both the GFirstLEP produced Strategic Economic Plan (SEP)(2014 and 2018) and the draft Local Industrial Strategy (LIS) (2019) and has used these documents to develop the Local Plan development strategy.” (Para 5.31)

“The SEP aims to provide good quality space in areas of good connectivity for businesses. The M5 corridor is identified as a Growth Zone, with sites close to motorway junctions identified as having the potential to deliver employment land attractive to new businesses and to create opportunities for existing businesses to grow. The aim is to realise the potential of this opportunity by operating a fast-track planning process; by ensuring the right infrastructure in proximity to the sites; and by exerting influence over the type of employment to be created within these locations.” (Para 5.32, emphasis added)

“The principal duty to co-operate issue surrounding the economy and employment within Gloucestershire is how the local authorities can work together to deliver the clear vision and strategy established by the SEP and more recently articulated by the emerging LIS to the benefit of Gloucestershire as a whole.” (Para 5.34)

“The ENA concludes that on the balance of evidence, and adopting a ‘best fit’ approach to local authority boundaries, the six Gloucestershire districts can be considered to form a single functional economic market area (FEMA).” (Para 5.36)

“GFirstLEP did not make representations at the Local Plan Reg.19 stage but the GFirstLEP’s Construction and Infrastructure Business Group did respond to the 2019 Draft Plan Reg.18 stage to state that the employment strategy was supported by the LEP and that ‘The Local Plan is considered to provide a good range and distribution of employment sites across the District that should help diversify the employment needs of the District and meet future employment trends’.” (Para 5.38 emphasis added)

“Neither the adopted JCS, nor any dialogue with the JCS authorities to date, has identified any likelihood of any shortfalls within the JCS area in terms of employment land supply and the Local Plan consequently has not sought to address this issue. However, the District Council is mindful of its duties and responsibilities and is happy to work with the JCS authorities through the JCS Review to examine whether there is likely to be a shortfall in employment land provision requiring authorities within the FEMA to assist.” (Para 5.41)

“In the event that the scale of unmet employment needs from Gloucester may require the allocation of other sites in adjoining local authority areas, the parties will commission jointly an assessment of the relevant sustainability of all reasonable alternative site options within the context of the latest adopted and emerging local plans framework and will seek to allocate the most sustainable form of development through the relevant local plan review process.” (Para 5.42)

[NB UKAEA has selected West Burton in Nottingham for the fusion power plant.]

1.3 The adjacent areas in Stroud doesn't not seem to be acknowledged as part of the spatial plan.

1.4 The Draft GSoCG July 2021 (Appendix 2 to Appendix 1 to EB3) states;

“Currently, Local Plans and the Local Transport Plan are the primary, statutory mechanism used to plan and deliver development in Gloucestershire. These plans, when considered holistically, provide a ‘spatial plan’ for Gloucestershire up to the mid 2030’s, broadly as follows:

- *The Urban Areas of Cheltenham and Gloucester, adjacent areas within Tewkesbury Borough, as well as Ashchurch are the focus of strategic growth” (Para 1.3)*

1.5 The GSoCG goes on to state,

“Whilst the economy of Gloucestershire is strong, there is greater economic potential to be achieved, with some sectors showing particular strength and with Gloucestershire home to some distinctive businesses activities that can be nurtured to the benefit of the local and wider economy. All prospective employers will in part be assisted through the provision of employment land and space where it is needed and of a scale and type suitable for the requirements of the relevant sectors, with particular regard to where Gloucestershire may have a particular advantage over other possibly competing areas. Flexibility will be key and this will need to be built through engagement across the key sectors. GFirst LEP will be a key contributor to providing the evidence base to help steer the changing economic context for Gloucestershire.” (Para 3.13)

1.6 The Draft SoCG on Strategic Employment matters was prepared at the submission stage of the Stroud Local Plan in October 2021. (Appendix 4 to EB3)

“The SEP aims to provide good quality space in areas of good connectivity for businesses. The M5 corridor is identified as a Growth Zone, with sites close to motorway junctions identified as having the potential to deliver employment land attractive to new businesses and to create opportunities for existing businesses to grow. The aim is to realise the potential of this opportunity by operating a fast-track planning process; by ensuring the right infrastructure in proximity to the sites; and by exerting influence over the type of employment to be created within these locations.” (Para 2.5)

“The JCS authorities have raised in their Regulation 19 response the potential for the proposed employment land supply in Stroud District to address any unmet Gloucester/ JCS needs, should they be required and in accordance with the JCS Review (JCS Reg.19 response para. 30).” (Para 2.14)

“No shortfall of employment land is identified in the adopted JCS and, given the stage of the JCS Review, it has not been possible to establish if there is a shortfall of employment land for that plan period. Consequently Stroud District Council, in preparing the Stroud District Local Plan, has not identified a requirement in the Local Plan to address any unmet needs. (Para 2.15)

“However, Stroud District Council is mindful of its duties and responsibilities and is willing to work with the JCS authorities through the JCS Review to examine whether there is

likely to be a shortfall in employment land provision requiring authorities within the FEMA to assist. “ (Para 2.15

“The JCS authorities have stated in their Regulation 19 response that “The next stage of the JCS process will present the preferred strategy for the review and identify reasonable alternatives to provide for development needs. As part of this process an urban capacity study will be undertaken in the coming months, from which it will be established Gloucester’s potential housing shortfall, and any employment shortfall for the JCS area” (JCS Reg.19 response para. 9). The timetable for the JCS Review is currently being reviewed and will be available in the autumn 2021.” (Para 2.17)

“In the event that the scale of unmet employment needs may require the allocation of other sites in adjoining local authority areas, the parties will commission jointly an assessment of the relevant sustainability of all reasonable alternative site options within the context of the latest adopted and emerging local plans framework and will seek to allocate the most sustainable form of development through the relevant local plan review process.” (Para 2.18)

1.7 As is usual the Local Plans and Strategic Plans do not align. As an adopted, sound, plan, it is not unexpected the adopted JCS has met its land requirements. However, in order to meet those land requirements, land outside the JCS boundary was required in addition to internal balancing between the three districts. The JCS relies on land in Wychavon District to meet its development growth needs. Table SP2a: Sources of housing supply in the JCS area Mitton (Wychavon District) Total 500.

1.8 The JCS Review has had a call for sites and the LDS is advising a Preferred Options Plan will be published in Spring 2023.

1.9 The JCS Reg 18 plan states,

“The JCS employment strategy seeks to support the delivery of land and jobs in close proximity to the M5 corridor. This supports the Strategic Economic Plan (SEP) prepared by the Local Enterprise Partnership (LEP). It also supports a sustainable pattern of growth, providing both jobs and employment opportunities in close proximity to one another[...].

Extending the plan period will mean that new land will be required to support economic growth. [...].

The JCS authorities continue to be committed to the economic growth of Gloucestershire and it is important this is reflected in the JCS Review. Of particular importance will be the recently updated SEP as well as the emerging Gloucestershire Industrial Strategy, both being prepared by the LEP.” (para 10.1 – 10.3)

1.10 Any requirement from adjacent authorities to meet unmet need in the JCS will need to be made in future revisions of those adjacent authorities plans unless special provision is made for early reviews. Such a process does not represent “a fast-track planning process”.

1.11 Policy G2 addresses meeting potential future unmet housing need from Gloucester at Whaddon.

“The adopted Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (2017) identifies that Gloucester City has a good supply of housing land to meet its requirements to at least 2028/9 but that an early review will be required to explore the potential for additional sites to meet Gloucester’s needs in the longer term. As a result, the District Council has been working with neighbouring authorities including Gloucester City Council to identify potential sustainable locations to meet longer term housing needs. In 2019, The Assessment of Strategic Development Opportunities in Parts of Gloucestershire: Interim Report assessed 29 locations adjacent to Gloucester and

identified seven locations as having the highest current degree of accessibility to Gloucester. Of the three locations identified within Stroud District, land at Whaddon offers the most potential to help meet the future housing needs of Gloucester.” (Para 3.4.22)

1.12 The JCS Reg 19 Response referred to above (CD 5d 916) states,

“It is noted that there is a planned oversupply in the SDLPR in respect of both housing (circa 1,000) and employment (circa 18ha). The next stage of the JCS process will present the preferred strategy for the review and identify reasonable alternatives to provide for development needs. As part of this process an urban capacity study will be undertaken in the coming months, from which it will be established Gloucester’s potential housing shortfall, and any employment shortfall for the JCS area. There are a number of sites that have been allocated [for/by] Stroud on the Gloucester fringe, such as Hardwicke, Hunts Grove and Javelin Park. Given the proximity of these sites to Gloucester and the planning oversupply within the SDLPR, the JCS authorities would wish there to be an opportunity within the SDLPR, by way of memorandum of understanding or otherwise, that such sites may provide for unmet Gloucester/JCS needs, if required and in accordance with the JCS Review.” (Para 9)

1.13 The SDLPR is very clear that employment allocations in the SDLPR are to meet the needs of Stroud District only. Core Policy CP2 – Strategic Growth and Development Locations, states,

“Stroud District will accommodate at least 12,600 additional dwellings and at least 79 hectares of additional employment land to meet the needs of the District for the period 2020-2040.”

“Commissioned jointly by all Gloucestershire councils, the Gloucestershire Economic Needs Assessment (2020) examined a range of scenarios for future economic growth to establish future employment land requirements for each District. For Stroud District potential requirements for the Plan period ranged from an additional 44.5 hectares to 71.8 hectares.” (Para 2.6.3)

1.14 It is clear the employment allocation of 79 hectares is to meet the needs of Stroud District only. However, it is clear the JCS expects that sites at Hardwicke, Hunts Grove and Javelin Park may provide for unmet Gloucester/JCS needs, given the proximity of these sites to Gloucester. The JCS authorities would wish there to be an opportunity within the SDLPR for Stroud to meet some of its unmet need, by way of memorandum of understanding or otherwise.

1.15 The JCS Reg 19 Response states,

“Site allocations for employment use are made at various strategic allocations, either as part of wider mixed-use developments or solely employment. It is noted that none of the strategic allocations directly abutting Gloucester City include employment provision (except for local service centres), but that near Gloucester [,] 27 hectares is allocated at Javelin Park and 5 hectares at Quedgeley East Extension (Policy CP2). Further afield, allocation are made at Stonehouse and Sharpness for a total of 32 hectares.

The [development] strategy aims to support employment growth along the M5 corridor, building on strengths in existing provision. This aligns with the strategy of the adopted JCS, which seeks to provide employment and housing needs close to where the needs arise and aligns with the aspirations of the Gloucestershire Strategic Employment Plan and emerging Gloucestershire Local Industrial Strategy.

As mentioned earlier in this response, the JCS Review is progressing and the next stage will consider the employment strategy to be progressed, and the amount, type and location of potential allocations. Given the planned oversupply in the SDLPR, the JCS

authorities would wish that there is an opportunity within the SDLPR that site the proximity of may be considered, by way of memorandum of understanding or otherwise, for unmet Gloucester/JCS needs, should they be required and in accordance with the JCS Review.” [sic] (Para 28-30)

“Overall, the JCS authorities broadly support the Stroud District Local Plan Review, particularly the safeguarding of land to provide for the unmet development needs of Gloucester City. At the time of writing, the JCS Review is progressing and will consider development needs, a spatial strategy and site opportunities. As the review progresses, it will be necessary for the JCS authorities and Stroud District Council to continue to engage in relation to the safeguarded site ‘Land at Whaddon’, and to consider other reasonable opportunities to address unmet development needs such as residential and employment land, including those on the fringe of Gloucester, should they be required and in accordance with the JCS Review.” (Para 31 emphasis added)

- 1.16 The JCS are clearly of the view that provision needs to be made to address any unmet need including for employment in Stroud and that the area around Javelin Park/Quedgeley is the most suitable location.
- 1.17 **The SDLPR should identify sustainable employment land close to Gloucester City to meet un-met need for employment land in Gloucester.**