Response of Tritax Symmetry (Gloucester) Limited

EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW INSPECTORS' MATTERS, ISSUES AND QUESTIONS

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Matter 5 New settlements at Sharpness and Wisloe

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Issue 5 – Are the proposed new settlement allocations at Sharpness and Wisloe justified, effective and consistent with national policy?

Strategic Site Allocation Policy PS36 Sharpness new settlement

The policy proposes the allocation of land south and east of Newtown and Sharpness for a new mixed use garden community. This includes up to 2,400 dwellings by 2040 and 10ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. This includes 25 criteria to be addressed.

How has the amount of employment land been determined and is this sufficient to ensure the site limits the need to travel and is self-sustaining? Are there job growth estimates and are these realistic?

- As in Matter 2, the employment allocations are made to justify the sustainability and garden village ethos, rather than to meet the employment needs of the district. Mixed use development elsewhere in Stroud and elsewhere in Gloucestershire shows that such employment allocations do not come forward. Employment allocations need to work in their own right and be commercially attractive over the time period envisaged. Stroud is well provided with local small scale employment land opportunities, further allocations deny the ability to allocate sites which will genuinely generate economic growth and jobs.
- 5.2 Policy should require that employment land is occupied on a pro rata basis as housing comes forward and this needs to be carried forward into planning consents. Without such controls the employment land will, as occurs elsewhere, remain undeveloped and unproductive.
- 5.3 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. It states,
 - "This section looks at the portfolio of employment land which will be available for the development of new E/B2/B8 premises to 2040, to meet the employment land needs, as identified in the ENA Study of 62.4-71.7 ha.

The District needs a balanced portfolio of land to accommodate a sustainable, growing economy that can respond to dynamic market conditions, changing business needs and working practices." (para 7.1-7.2)

"each Site has been scored against ten criteria relating to Site Location and Access, Planning Status, Site Conditions and Availability. The maximum score possible is 100. The Scoring Criteria can be found in Appendix 5 and individual Site scores can be found in Appendix 8. Figure 16 shows the scoring for the 12 sites identified as comprising Stroud District's realistic long term supply. The assessment gives an appraisal of the overall quality of the land resource and provides one measure of what sites could be considered priorities for Local Plan allocation and what sites are of secondary value." (para 7.19)

Our views on the scoring criteria for the employment element of PS36 are in Appendix 1 of this statement. The relative environmental setting and flexibility criteria seem to be over valued and constraints under estimated.

Strategic Site Allocation Policy PS37 Wisloe new settlement (within the Berkeley Cluster)

The policy proposes the allocation of land at Wisloe for a new mixed use garden community, including approximately 1,500 new dwellings and 5ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. The policy lists 24 elements to be addressed.

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Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective?

- 5.5 As above, the employment allocations are made to justify the sustainability and garden village ethos, rather than to meet the employment land needs of the district. Mixed use and strategic allocations elsewhere in Stroud and elsewhere in Gloucestershire shows that such employment allocations do not come forward. Employment allocations need to work in their own right and be commercially attractive over the time period envisaged. Stroud is well provided with local small scale employment land opportunities; further allocations deny the ability to allocate sites which will genuinely generate economic growth and jobs.
- 5.6 Policy should require that employment land is occupied on a pro rata basis as housing comes forward and this needs to be carried forward into planning consents. Without such controls the employment land will, as occurs elsewhere, remain undeveloped and in productive.
- 5.7 Our views on the ELR scoring criteria for the employment element of PS37 are in Appendix 1. The relative location, prominence and public transport access criteria seem to be overvalued.
- 5.8 The site selection process should include a realistic view on the delivery of sites over the plan period.
- 5.9 The Strategy should allocate strategic and local employment sites in realistic proportions to reflect need, demand and take-up to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth.