

Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="√"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="√"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CP11 New employment development

This policy is supported.

It is noted that criteria 2 in respect of the location of new industrial or business development states that such locations should be ***“readily accessible by public transport, wherever possible, and by bicycle and foot, or contribute towards provision of new sustainable transport infrastructure to serve the area, in order to make the development accessible by those modes.”***

Consequently it is considered that strategic locations for growth should accord with this policy criteria.

It should be noted how positive the Employment Land Review (ELR) (March 2021) is towards land at Grove End Farm, Whitminster which we are promoting as an alternative site to Sharpness in a far more accessible and sustainable location and also attractive to the market. The Executive Summary of the ELR recommends that the Council consider allocating Grove End Farm as part of its employment land supply. The report considered the site (in Table 29 as Employment land for up to 52,000 sqm within mixed-use development including 2,250 dwellings), this is a far more sustainable location and accessible from the movement corridor and enabling public transport to be supported and would satisfy the locational requirements proposed in Policy CP11.

Table 35 of the ELR provides a summary of the employment sites assessment. Page 158 concludes for Grove End Farm, Whitminster that:

“Although only a Local Plan/SALA Call for Sites submission at this stage, with no detailed masterplanning or agreements amongst the landowners about the nature of delivery, *this location does have some advantages over the other New Settlement proposals, at least in terms of employment land deliverability. These include the fact that the land is under the control of an experienced developer who is already active in the area, marketing E/B-Class plots at West of Stonehouse, thus knows the local market and business requirements.*

The employment land is in a very strong location off Junction 13, M5 allowing it to tap into the two core markets of the District – larger sub-regional/regional requirements on the M5 Corridor and large business growth in Stroud/Stonehouse. The linear nature of the proposed employment site would prevent development of the very largest B2/B8 units here, but it could still provide some 52,000 sqm of space at standard developer ratios.

The site would also benefit from proximity to the Eco Park proposal, which would build up a critical mass of businesses at Junction 13. There could be some competition between the two sites, however, the Eco Park will focus on accommodating businesses with specialisms in green technology. There is no assumption the Land north of Grove End Farm will have a similar, overlapping focus.” (my emphasis).

The above clearly demonstrates the suitability credentials of land at Grove End Farm, Whitminster as a sustainable and deliverable location. This is further endorsed by paragraph 7.15 of the ELR which considers that three new settlement options (only the employment element of Grove End Farm Whitminster has been considered),

- **“this would seem to be the strongest of the options. Land here is optioned to a commercial developer who is already active locally, marketing/developing E/BClass plots at SA2: West of Stonehouse, so has existing knowledge of local market conditions. Positioned at Junction 13, M5 it can tap into both the M5 Corridor market and demand for Stonehouse, a centre for both B2/B8 business expansion in the Stonehouse/Stroud Valleys area and for larger E1(g) (i) offices. It would be well placed to meet longer term growth needs if employment land around Great Oldbury is taken up relatively early in the Plan period. Assuming the Eco Park proposal was brought forward, critical mass around Junction 13 would further increase, with the area becoming a centre for advanced manufacturing in Stroud District”**

Whereas

“PS36 New Settlement at Sharpness - Sharpness is far from isolated from Gloucestershire and Bristol markets, and the proposal for a Knowledge Based business park would benefit from a proximity to GSTP which lacks options to meet the needs of larger technology businesses, both firms expanding from its accommodation and inward investors, particularly manufacturing/logistics firms. In the short-mid term, the Eco Park Proposal, if realised, could meet a lot of this need. In the longer term, some 10-15 years, a Knowledge Based business park at Sharpness could be well placed to support further growth. 10-15 years is perhaps a realistic timeframe for the delivery of an employment scheme within the complex Sharpness New Settlement. However, to deliver such a Knowledge Based business park, the Sharpness scheme will need to secure the buy in of a developer/manager willing to retain a longer term interest. Ideally, it would also need the support of anchor occupier willing to take space and draw other occupiers to the area, as seen in the Eco Park/New Mills proposals.” (my emphasis)

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Consideration should be given to how the employment needs are to be met having regard to the ELR's conclusions. These points are covered in more detail in response to Policy PS36

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Whilst this policy is supported our concerns are about the ability of the policy to be effectively implemented. Our objections go the heart of the Plan in terms of the its strategy as we consider the Plan as drafted is unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

20.07.2021