

STROUD DISTRICT LOCAL PLAN REVIEW INSPECTORS MATTERS, ISSUES AND QUESTIONS

Matter 8 Statement
Ecotricity Group Ltd

Matter 8 Employment Provision

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?

Employment land supply

Table 5 of the Plan (page 40) summarises the employment land supply as 79 ha for the plan period. This consists of eight new strategic employment sites, as allocated in Core Policy CP2 and individual site allocation policies.

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.

Table 4 of the Plan (page 37) sets out total commitments of 52.1 ha (as at April 2020) and potential losses of 40.6 ha, leaving an available supply of commitments of 11.5 ha. Deducting this from the employment requirement for the plan period of 62.4-71.8 ha leaves a residual employment land requirement of 50.9-60.3 ha.

Taking into account relevant questions under Matter 4 our queries on employment land supply are as follows:

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

8.1 The Employment Land Review (ELR – EB30) highlights that the methodology follows Planning Practice Guidance (PPG) on employment land reviews. It recognises the methodology within the PPG relating to 'Housing and Economic Land Availability Assessment' and 'Effective Use of Land' regarding reviewing suitable land and assessing whether existing employment allocations should be protected or reallocated for a more deliverable use.

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)?

- 8.2 Paragraph 3.8 highlighted the realistic supply of possible employment land to 2040, incorporating 2020 Commitments, existing allocations in the adopted 2015 Local Plan, proposed sites in the 2019 Draft Local Plan and further submissions made to Local Plan/SALA/Call for Site exercises.
- 8.3 The Employment Topic Paper (EB7) highlights that the Local 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.
- 8.4 The Topic Paper goes on to state that *‘taking into account the key recommendations of the ELR, the employment strategy for Stroud, through the SDLP will provide new employment development through a range of sites and premises across the District. Strategic employment sites will be allocated, mixed use developments encouraged and the expansion of existing businesses and rural diversification supported.’*

4. Paragraph 4.1 of the Employment Topic Paper (EB7) identifies that the level of existing commitments and Plan allocations exceeds the employment land need identified in the ENA study as 62.4-71.8ha. It states that the ‘additional supply, above need levels, provides a buffer to allow for further losses of employment land, to other uses, to 2040’. What further losses is this referring to and is this approach justified?

- 8.5 The ELR (EB30) highlights the following:

‘105.14 ha exceeds the level of employment land need, identified in the ENA Study as 62.4-71.4ha to 2040 (see above). However, the additional supply, above need levels, provides a buffer to allow for further losses of employment land, to other uses, to 2040. In the 14 years between 2006 and 2020 28.44ha of E(g)/B class land was lost from in the District. Although the Study has taken account of known future losses from existing permissions, 17.39 ha at the time of writing, there are likely to be further losses from the local employment stock in the 20 years to 2040, following past trends and potentially increasing due to the new flexibility in changes of use introduced by the E Class. These losses would need replacing and the additional supply identified at this stage will safeguard against any further losses in the baseline supply. This should be subject to active monitoring and feed into future Local Plan reviews.’

Provision of new tourism opportunities - Delivery Policy E110

11. Is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, including paragraphs 84 and 85 of the Framework?

8.6 As part of previous consultations to the SDLPR, a Stroud Hotel Needs Assessment Study (October 2020) was prepared by Hatch Regeneris (EB91: Documents relating to PS20). This provides information on the current provision of hotels in and around Stroud and current and future demand for hotel beds.

8.7 It concludes the following:

- The area has a relatively buoyant visitor economy, which supports over 3,000 jobs across the District.
- There is a relatively limited supply of hotel beds and many national hotel chains are relatively small in size.
- There have been no recent completions of new hotels within Stroud District over the last five years.
- Stroud is under-represented in terms of hotel bed spaces compared to nearby district centres.
- There is a lack of luxury hotels in the local area.
- There are aspirations to increase the size of the Cotswold visitor economy by 5% per annum in the future, with high-quality accommodation recognised as one of the key attractors within the Cotswold market
- There is a growing local market, with Stroud's population expected to increase by 15%, faster rates than national levels.

8.8 The above market conditions are reflected in the economic aspirations for the area. It is clear that there is policy support for the provision of tourism related uses in the SDLPR, with one of the key objectives being to continue to *'develop the tourism potential of our area as a unique selling point for living, working, visiting and investing in the District.'* This is consistent with the approach taken by GFirst LEP in the Strategic Economic Plan which identifies the tourism and visitor economy as being an important one for Gloucestershire, which represents 8% of all employment. The Draft Local Industrial Strategy identifies tourism as one of the area's key local capabilities and assets. There are ambitions to achieve Tourism Zone status as part of the Industrial Strategy Tourism Sector Deal, widening the County's appeal to all visitors young and old, domestic and international, to increase the value of the visitor economy and support issues of seasonality.

8.9 Policy EI10, which encourages the provision of new tourism opportunities, is therefore justified as it aims to deliver these aspirations.