

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.

- 8.2 The ELR utilises information from the ENA and the FEMA to help assess the forecast needs of the District but recognising that there are no set formulas for assessing future needs. However, the information in the aforementioned documents demonstrates that Stroud District had seen the second highest level of average annual completions over 2011-19 and the average annual take up rate was more than double that of Gloucester's and nearly four times that of Cheltenham's. Stroud District had also seen the highest rates of E(g) (i/ii) office development in Gloucestershire, again noticeably above rates in Cheltenham and particularly Gloucester.
- 8.3 Paragraph 2.3 of the ELR shows the average annual take up rate for Stroud District was then projected forward for 20 years to give a need of 237,700 sqm. This is then converted into a land need by dividing the floorspace totals by 4,000. i.e. by assuming that for every hectare of employment land developed, 40 percent of the site will be covered by buildings, the rest by ancillary uses such as car parking, access roads, etc. This generated a land requirement of 59.4 ha to 2041, or 28.3 percent of the total employment land requirement for Gloucestershire of 209.3 ha. Reflecting past data, Stroud District's requirement included a strong E(g) (i/ii) office requirement of 24.4 ha or 41.1 percent of the total need for Stroud District.
- 8.4 The combination of looking at past and future trends as well as examining the growth sectors in the District demonstrates that the methodology in the ELR is an appropriate and robust approach and consistent with national policy and guidance.
- 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)?**
- 8.5 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.

- 8.6 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.
- 8.7 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.'*
- 8.8 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. Two thirds of the supply is at Quedgeley/Junction 12, M5 or Stonehouse/Junction 13, M5. This is an area within the *growth* zone and well served by existing infrastructure. Given the popularity and demand in these areas it is unsurprising that these locations have been the focus for growth in Stroud District for over 15 years and remain a focus for demand, both in Stroud District and for Gloucestershire more generally.
- 8.9 22.1 percent of the supply is in Sharpness and this area is deemed to be well connected to the sub-regional property market as evidenced by the growth at Severn Distribution Park and nearby GSTP, Berkeley. At Sharpness new settlement 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. A Knowledge based business park at Sharpness will be well placed to support further employment growth as part of a Garden Community which delivers infrastructure for modern living.
- 8.10 9.0 percent of the supply is in, and around, Cam/Dursley, where local market demand exists, as evidenced by the growth of Littlecombe Business Park. No new sites are proposed in the Stroud Valleys or in Stroud town itself, and demand research has not shown an urgent need for land here.
- 8.11 The employment sites chosen for inclusion in the Plan were scored against ten criteria relating to Site Location and Access, Planning Status, Site Conditions and Availability. 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. The highest scoring sites are Quedgeley East (SA4a) and PS20: M5 Junction 13, reflecting these sites strong positions on both the M5 and major A Roads. Both sites are under majority control of parties who are actively progressing development options, giving confidence that they can be delivered in a relatively short timeframe. PS47: Renishaw New Mills, although more peripheral in the District is relatively unconstrained land with clear plans for delivery which are being progressed by the owner.

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?

- 8.1 It is recognised that 105.14 ha exceeds the level of employment land need, identified in the ENA Study as 62.4-71.4ha to 2040 (see Section 2.0). However, this is considered to be a sensible approach to safeguard and support a robust and growing economy and to provide choice and flexibility in the marketplace.
- 8.2 The further losses do not relate to quantifiable or identified sites. The ELR has already taken account of identified future losses from existing permissions, (17.39 ha). However a robust approach to the supply of employment land will be to predict for further losses from the local employment stock due to the new flexibility in changes of use introduced by the E Class and following past trends.
- 8.3 Past trends demonstrate that in the 14 years between 2006 and 2020, 28.44ha of E(g)/B class land was lost in the District. These losses will need replacing and accordingly the additional supply identified will safeguard against any further losses in the baseline supply.