

EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

Response of Tritax Symmetry (Gloucester) Limited

Matter 6 Site allocations

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Issue 6 - Are the proposed housing, employment and mixed-use site allocations justified, effective and consistent with national policy?

The results of the site selection process are set out in various SALA reports and updates produced from 2017 to 2020 (EB19-EB26).

Matter 6a Site allocations - General questions

Many of the site allocations propose a mix of development but only the number of dwellings is specified. Where other uses such as employment are also sought, why is the size of that other use (i.e. floorspace or land area) not also specified? How will a decision-maker determine if a future development proposal meets the policy and identified needs, if the requirements are not clearly defined?

- 6.1 Such sites should not specify the employment to be created, as with other mixed use sites, employment use is aspirational and should not be included in employment land supply figures as it is not primarily aimed at meeting the district's employment land need. The policy is generally permissive of employment uses if such uses come forward but does not specify them as a requirement. Such an approach should be used in other mixed-use schemes where employment is not genuinely sought in its own right rather than as a justification for residential development.

Can the Council confirm which sites in the Plan have been allocated in a previous plan and explain why these sites have not been successfully delivered? Do the same reasons exist now, and if so, why does the Council consider the sites will be delivered during this plan period?

- 6.2 PS34 Sharpness Docks. The allocated employment land has been allocated since the Adopted 2005 Local Plan and 2015 Local Plan. The land also benefits from PDR for marina related uses. The principle of development for employment uses can not be questioned. Development has not occurred.
- 6.3 SA5a, to the North, is allocated in the adopted 2015 Local Plan and remains undeveloped. The site has received outline planning permission for 2 no. buildings for light industrial/storage and distribution purposes (Use Classes B1 and B8) and associated works, as an extension to Severn Distribution Park. It lies between PS34 and PS36. While not re-allocated this shows the likelihood of developing similar sites.

Has an appropriate lead-in time and delivery rate been used when determining the delivery timeframe for each site (whether residential, employment or mixed use) and is this realistic?

- 6.4 No delivery timescales are provided for employment land. Sites allocated in the previous plan in similar locations and of a similar type are yet to come forward. There is no realistic prospect further sites will come forward. Sites allocated in the right locations like Javelin Park and Quedgeley East have delivered the employment sought.
- 6.5 Appendix 5 of EB30, the Employment Land Review, optimistically estimates some sites will only come forward in 10+ years.

Overall, is each site allocation justified, viable and deliverable or developable (in accordance with the Framework definitions)?

- 6.6 Other than definitions in the Framework for residential development the Framework refers to definitions for site allocations to be justified, viable and deliverable or developable as follows;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
- Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

6.7 Many of the allocated employment sites are not justified, viable, deliverable or developable as demonstrated by the lack of progress on similar sites allocated in earlier plans some of which having planning permissions. Our analysis in Appendix 2 and 3 of this statement sets out delivery issues of these sites.

Matter 6b Stroud Valley site allocations

Local Sites Allocation Policy PS01 Brimscombe Mill

The site is allocated for 40 dwellings, employment uses and associated community and open space uses and enabling infrastructure.

- a. What type and scale of employment use is proposed?
- b. We understand this is a previously allocated site. Why has it not been successfully developed and do those same reasons exist now?

6.8 As noted, Brimscombe Mill SA1d has previously been allocated for unspecified employment and this has not come forward.

Local Sites Allocation Policy PS02 Brimscombe Port

The site is allocated for 150 dwellings, canal related tourism development and employment uses and associated community and open space uses and enabling infrastructure.

- What type and scale of employment use is proposed?

6.9 SA1e Brimscombe Port has previously been allocated for unspecified employment and this has not come forward.

Strategic Site Allocation Policy PS19a Stonehouse North West

The site is an extension to Stonehouse at Great Oldbury. It is allocated as a mixed use development including approximately 700 dwellings, 8 plots for travelling show people uses, approximately 5 ha for defined employment uses and the provision of or contributions to community facilities. The policy seeks a development brief incorporating an indicative masterplan, that will address 21 listed requirements.

6.10 We have commented above regarding whether the employment element of the allocation is justified, viable and deliverable or developable.

6.11 Our views on the ELR scoring criteria for the employment element of PS19a are in Appendix 1. The relative location, availability and flexibility criteria are over valued given the adjacent site is yet to come forward and the proposed masterplan contains no employment land.

Strategic Site Allocation Policy PS20 Stonehouse – Eco Park M5 Junction 13

This site is allocated for a strategic mixed use development, to include employment, a sports stadium, sports pitches, a 70 bed care village, a hotel and canal and open space uses. The policy seeks a development brief incorporating an indicative masterplan, that will address 20 listed requirements.

- 6.12 We have commented above regarding whether the employment element of the allocation is justified, viable and deliverable or developable.
- 6.13 Our views on the ELR scoring criteria for the employment element of PS20 are in Appendix 1. The prominence of the two employment areas is over valued based on the proposed masterplan.

Matter 6e Gloucester’s rural fringe site allocations

Employment Allocation Policy PS43 Javelin Park

The site is 27 hectares in size and is allocated as an extension to the key employment site EK14 Javelin Park for office, B2 and B8 employment uses. The policy also requires a strategic landscape buffer along the western, southern and eastern boundaries of the development.

- 6.14 The ELR significantly under values the sustainability of this site as it is based on the Reg 18 allocation of 9 hectares. We have scored the site based on 27ha.

Table 1: ELR Sustainability Score

Javelin Park (PS43)	ELR Score	TSL Comment	TSL Score
Size (ha)	27ha	The site is now 27 ha	
Location	9	<i>Proximity to strategic highway network (M5 Motorway and/or A38, A46 or A419): Site/Area 0 km from a strategic road – score 10 Site/Area 0.5 km from a strategic road – score 9</i> The site is 0.5km from M5 J12	9
Prominence	6	<i>Site/Area adjacent to, and visible from motorway – score 10/9</i> The site is adjacent to the motorway and visible from it.	10
Public Transport	0	<i>Site/Area close to bus route (within 0.5 km) and near to rail station (within 2 km) – score 10</i> The site is within 500m of an existing bus stop	10
Sequential test	3	<ul style="list-style-type: none"> • <i>Within urban area – score 10</i> • <i>Urban fringe (close to settlement development boundary) – score 7</i> • <i>Rural location (away from settlement development boundary) – score 3</i> 	3
Planning Status	1	<i>If site is available, subject to planning – score 1</i>	1
Services Availability	7	<i>If priority services are available with no abnormal costs – score 7</i>	7
Constraints	10	<i>May be physical (including access). planning, or legal Reduce score by 2 for each constraint</i>	8
Environmental Setting	3	<i>Good quality business park/greenfield location – score 10</i> This is a greenfield location.	10

		<p><i>Score site in terms of site shape and ability to sub-divide to suit smaller occupiers. Score Areas in terms of scale and capacity to accommodate business properties of different sizes and uses – large warehouse, industrial, office, etc.</i></p>	
Flexibility	3	The hybrid application masterplan demonstrates the ability to accommodate different sized units.	10
Site Availability	8	<ul style="list-style-type: none"> • Site available to develop within 0-1 year – score 10 • Site available to develop within 1-5 years – score 8 <p>The site is available to be developed immediately subject to planning.</p>	8
Total	50		76

- 6.15 It is not clear what is meant by ‘strategic landscape buffer’ or “structural landscape buffer” used elsewhere. However, in bringing the site forward in dialogue with Council officers and their appointed experts, an appropriate landscape buffer to mitigate the impact of the proposals has been agreed. In respect of policy it is assumed the landscape buffer needs to be suitable to mitigate the impact of proposals, strategic suggests this may need to address wider landscape impact effects.
- 6.16 In respect of sustainable transport measures, again as part of bringing the site forward discussion and agreement has been reached with GCC, NH and Stagecoach on what sustainable transport measures are required which includes extending the combined footpath/cycleway to the site entrance and providing a bus stop, turning area and waiting area as well as other measures.
- 6.17 Necessary highway improvements in respect of the proposed employment development have been agreed with GCC and NH including necessary contributions to highway works.
- 6.18 In respect of visual impacts on heritage assets and AONB these have been addressed in the planning application and landscape works agreed to mitigate any impact.

Matter 6f The Berkeley cluster site allocations

[Strategic Site Allocation Policy PS34 Sharpness Docks](#)

The site is allocated for mixed development, including an area of 7 ha for dock uses and dock related industries in Sharpness Docks South and a mix of housing (up to 300 dwellings), tourism, leisure and recreational uses in Sharpness Docks North.

- 6.19 We have commented above regarding whether the employment element of the allocation is justified, viable and deliverable or developable.
- 6.20 Our views on the ELR scoring criteria for the employment element of PS34 are in Appendix 1. The sites main attribute being it is already allocated in the 2015 Local Plan.

Matter 6h The Wotton cluster site allocations

[Employment Allocation Policy PS47 Land west of Renishaw New Mills](#)

The site is 10 hectares in size and is allocated as an extension to the key employment site EK17 Renishaw New Mills for a mix of office, B2 and B8 uses.

- 6.21 We have commented above regarding whether the employment element of the allocation is justified, viable and deliverable or developable.
- 6.22 Our views on the ELR scoring criteria for the employment element of PS47 are in Appendix 1. The ELR seems to have underestimated the sites constraints having only identified one (planning), and overestimated flexibility and availability. At only 4 ha and with environmental constraints the flexibility is limited. Most significantly the ELR scoring has an error, it has scored the site 19 out of 10 for environmental setting. These adjustments significantly reduce findings on the overall quality of the land resource and reduces the site's priority for Local Plan allocation, which was the point of the ELR.
- 6.23 The site selection process should include a realistic view on the delivery of sites over the plan period.**
- 6.24 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.**