

**EXAMINATION OF THE STROUD DISTRICT LOCAL  
PLAN REVIEW**

**INSPECTORS' MATTERS, ISSUES AND QUESTIONS**

**MATTER 8:**

**Employment Provision**

**On behalf of: Robert Hitchins Ltd**

Date: February 2023 | Pegasus Ref: SHF/P17-2258

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## Document Management.

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Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 1, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 6a
- Matter 6c
- Matter 6d
- Matter 6g
- Matter 7
  - Matter 7a
  - Matter 7b
  - Matter 7c
- Matter 8
- Matter 10
  - Matter 10a
  - Matter 10c
  - Matter 10d
- Matter 11
  - Matter 11a
  - Matter 11b
  - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



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## 8. 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:

1. **Are more recent updates available on employment completions, commitments, and losses since the start of the plan period?**
  - 1.1. This is for Stroud District Council to answer.
2. **Is the methodology on assessing employment land supply in the ELR justified and consistent with national policy and guidance?**
  - 2.1. This is for Stroud District Council to answer.
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)?**
  - 3.1. This is for Stroud District Council to answer.
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?**
  - 4.1. This is for Stroud District Council to answer.

### New employment development – Core Policy CP11

5. **Core Policy CP11 supports new employment development.**
  - a. **In accordance with paragraph 16 of the Framework, is the purpose of the policy clear and does it avoid unnecessary duplication of other policies?**

5.1. The purpose of Policy CP11 seems to be reasonably clear, however, as with other Core Policies, there is a degree of duplication with the Delivery Policies. This particularly relates to the numbered bullet points in the 2<sup>nd</sup> part of the Policy. Should the Policy remain as drafted, to aid clarity and ease of use of the Plan, there should be signposting to other relevant policies in the Plan.

**b. Is it consistent with paragraph 82 of the Framework, particularly in relation to providing sufficient flexibility?**

5.2. There appears to be sufficient flexibility by reference in the Policy 'in recognising the specific locational requirements of different sectors'.

**c. Would the policy wording modifications in relation to providing sufficient flexibility and the inclusion of waste management infrastructure, as suggested by representors, ensure the policy was effective and consistent with national policy or would other changes be necessary to achieve this?**

5.3. No comments.

#### **Key employment sites – Delivery Policy EI1**

6. Delivery Policy EI1 seeks the retention of key employment sites for employment uses.

**a. Is it clear how the list of key employment sites has been determined and is it justified?**

**b. Is the policy consistent with paragraph 82 of the Framework, particularly in relation to providing sufficient flexibility and to enable a rapid response to changes in economic circumstances?**

6.1 No comments.

#### **Regenerating existing employment sites – Delivery Policy EI2**

7. Delivery Policy EI2 permits the regeneration of five employment sites for mixed uses.

**a. Is it clear how the list of sites has been determined and is it justified?**

**b. What is the reason for including the caveat 'provided that there are demonstrable environmental and/or conservation benefits' and is this justified and effective?**

**c. The policy seeks the provision of at least the same employment opportunities as existed when the employment site was previously used. Whilst this is subject to viability and site-specific circumstances, how would a decision-maker determine what the previous level of employment opportunities were and the circumstances when this would not apply? Is this approach justified and effective? Is it consistent with national policy, particularly paragraph 82 of the Framework?**

**d. Would the policy wording modifications, as suggested by representors, ensure the policy was effective and consistent with national policy or would other changes be necessary to achieve this?**

7.1. No comments.

#### **Former Berkeley Power Station – Delivery Policy EI2a**

8. Delivery Policy EI2a seeks the retention of the former power station for employment and employment related uses, and for operations and uses associated with the decommissioning of the power station.

a. Is the policy sufficiently clear and effective?

b. Are the suggested wording modifications, to secure improvements to related infrastructure and provide clarity on the distinction between the de-licensed and licensed parts of the site, necessary for effectiveness of the policy?

8.1 No comments.

#### **Development at existing employment sites in the countryside – Delivery Policy EI4**

9. Is the purpose of the policy clear and is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, particularly paragraphs 84 and 85 of the Framework?

9.1. No comments

#### **Farm and forestry diversification – Delivery Policy EI5**

10. Is the purpose of the policy clear and is the policy justified and effective? Does it unnecessarily repeat other Plan policies? Is it consistent with national policy, particularly paragraphs 84 and 85 of the Framework?

10.1 No comments

#### **Provision of new tourism opportunities – Delivery Policy EI10**

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?

11.1 No comments.

**Town & Country Planning Act 1990 (as amended)**  
**Planning and Compulsory Purchase Act 2004**

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