



Kingswood Parish Council Hearing Statement

Stroud Local Plan Examination

**Matter 4 – Employment needs and
requirement**

February 2023

This Hearing Statement is prepared and submitted on behalf of Kingswood Parish Council (KPC).

(Please note that questions relating to employment land supply and provision, including site allocations and delivery, are set out under later matters)

Issue 4 – Are the identified employment needs supported by robust and credible evidence, justified and consistent with national policy? Is the Plan’s proposal to accommodate 79 ha of employment land soundly based?

The economic need for the District has been established through the Gloucestershire Economic Needs Assessment (2020) (ENA) (EB29), which examined a range of scenarios for future economic growth. The ENA recommends that the amount of additional employment land needed should be between 62 and 72 ha for the plan period, to accord with the highest two scenarios: a scenario based upon the expected labour supply and a slightly higher labour demand growth scenario based upon supporting growth in the key local industrial strategy sectors.

Within the Plan (page 37) the Council suggests that, once commitments from outstanding planning permissions (as at April 2020) and potential losses are factored in, the minimum residual employment land requirement for the plan period is a range between 50.9 and 60.3 ha.

Q2. Is use of the higher needs scenarios justified? Have clear reasons been given as to why lower economic needs figures would not be appropriate?

KPC Response:

1. The Local Plan states at Paragraph 2.6.3 that the *“Assessment recommended that the Council should consider meeting two of the highest scenarios: a scenario based upon the expected labour supply and a slightly higher labour demand growth scenario based on supporting further growth in the key LIS sectors.”*
2. We cannot locate any justification as to why SDC decided to use the higher labour demand growth either in the Local Plan or in the Employment Topic Paper. Therefore, there appears to be no justification for the higher employment land figure.

Q3. What progress has been made on the delivery of the employment land commitments (as at April 2020) of 52.1 ha? Can the Council provide an update on this in the form of a site schedule? Will all of these committed sites be delivered during the plan period?

KPC Response:

3. SDC providing this updated information will hopefully allow for one to arrive at a justified 'residual' figure for what employment land is required.

Q4. Potential losses of 'B' uses over the plan period is calculated as 40.6 ha. This is based on an average 2.03 ha loss per year since 2006. Is this potential future loss a realistic forecast or has it been under or over-estimated?

KPC Response:

4. It would help if SDC could also clarify whether the Use Classes update in September 2020 was factored into the ENA. Presumably not as the ENA was published the month before in August 2020. How is SDC addressing this in terms of, for example the changes to Offices from Class B to Class E both in terms of need assumptions? This is currently unclear and could have important consequences for the soundness of the Local Plan.

Q5. The minimum employment land requirement range of 50.9 to 60.3 ha does not appear to be set out in policy. Instead Core Policy CP2 states that 'Stroud District will accommodate....at least 79 hectares of additional employment land to meet the needs of the District for the period 2020-2040....', which is above the minimum requirement. This higher figure appears to be based on the proposed new employment land supply comprising eight strategic development site allocations. Whilst our questions on these site allocations and overall employment land supply are set out under later matters, is the provision of a higher level of new employment land than is necessary to meet the minimum requirement justified by robust evidence? Can the Council clarify the percentage of additional employment land being proposed above the identified requirement and explain the reasons for this?

KPC Response:

5. It is entirely unclear as to the reasoning or justification for the additional 19 -28 hectares of employment being proposed in the Local Plan compared with that of the Council's ENA report.

END.