

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

**INSPECTORS' MATTERS, ISSUES AND QUESTIONS**

Response of Tritax Symmetry (Gloucester) Limited

**Matter 2 Spatial Strategy and site selection methodology**

## **Matter 2 Spatial Strategy and site selection methodology**

***Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence?***

### Vision and objectives

- 2.1 The Plan ignores the potential for future employment needs of Gloucestershire/ JCS area.

### Spatial strategy

- 2.2 As referred to in Matter 1 the strategy is to concentrate most development at principle settlements, however, the role of Gloucester City is not recognised in the settlement hierarchy while having a major influence on the spatial strategy.
- 2.3 Gloucester City and the importance of the M6 needs greater emphasis in the strategy. There is an over reliance on remote, unsustainable locations for employment development to meet a strategic need.
- 2.4 CP4 seems to be concerned with new residential development, large scale employment development can not be expected to “integrate in neighbourhoods”, “support local community services and facilities ”and create safe streets, homes”.

### Settlement hierarchy

- 2.5 As referred to in Matter 1 the strategy is to concentrate most development at principal settlements, however, the role of Gloucester City is not recognised in the settlement hierarchy while having a major influence on the spatial strategy.

### Site selection methodology

**The Council’s methodology for site assessment and selection is set out within the Strategic Assessment of Land Availability 2016 (SALA) (EB18) and explained in the Topic Paper: Assessment and selection of sites topic paper (EB9).**

- 2.6 The assessment does not take into account commercial viability and whether the sites identified will be developed for employment uses and generate the new jobs required. It seems to be forgotten that the point of making land allocations is to cause the necessary job growth required by the strategy. In some cases land is allocated for employment uses simply to produce a balanced, theoretically sustainable, allocation. Policies for those housing led, mixed use allocations do not require the provision of the associated employment uses, so that the residential element can forward in totality with no employment created. Employment land needs to be allocated in locations and on sites which will genuinely attract employees leading to job creation.
- 2.7 Affectively the Local Plan is “land banking” employment need in locations where development will not come forward and stifling development in areas where there is genuine demand.
- 2.8 Existing allocations in the 2015 Local Plan, and some from the 2005 Plan, have not produced any employment despite the allocation and often an accompanying outline and reserved matters consent. It is wrong to expect job creation to happen on extensions to these sites when the original sites have not produced any employment in the previous plan period(s).
- 2.9 NPPF paragraph 82 states planning policies should:

“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

- 2.10 NPPF does not simply require land to be allocated, it requires policies which encourage growth and meet needs.
- 2.11 Appendices 2 and 3 to this statement set out a commercial assessment of sites allocated in the 2015 Local Plan and the SDLPR, relied upon to generate the jobs required in the District. This alternative assessment was prepared by Colliers and TSL.
- 2.12 In particular 34ha of land is allocated at Sharpness; 17ha is in the 2015 Local Plan and has outline consent and has not come forward, there is little prospect of a further 17ha being developed over the coming plan period. At Stonehouse, 25ha are proposed; 10 hectares in the 2015 Local Plan and 15 in the SDLPR. Again, the original allocation is yet to come forward. At Wisloe 16ha is allocated, 11.4ha in the 2015 Local Plan and a further 5 hectares in the SDLPR.
- 2.13 The 2015 Local Plan (CP2) allocated 58 hectares of additional employment land for the period 2006-2031 at,
- Quedgeley East 13 ha
  - North East Cam 12 ha
  - Sharpness 17 ha
  - Stroud Valleys Intensification (6 ha)
  - West of Stonehouse 10 ha
- 2.14 Only land at Quedgeley East (St Modwen Park) at M5 J12 has been developed and is partially occupied. The SDLPR is seeking to replicate employment allocations in the 2015 Local Plan that have not delivered the jobs, sustainable economic growth and local and inward investment required. The employment strategy set out within the SDLPR seeks to deliver economic growth and additional jobs. The success of St Modwen Park/Quedgeley East demonstrates there is demand for new premises on sites in the right commercial location and that jobs and economic growth are possible. Of the 137ha of land allocated for economic growth over the two local plans only 45ha is allocated on proven successful locations.
- 2.15 It is recognised the strategy also requires,
- new employment sites of varying sizes and locations to meet the specific locational requirements of different sectors, with particular support for green technology hubs
  - support for affordable, low cost sites and premises with flexible terms for business start ups
  - opportunities to foster on-going employment-education links
  - new employment together with new housing to create sustainable communities and to reduce the potential for further out commuting.
- 2.16 However, land allocated for such purposes (45 hectares) in the 2015 Local Plan has not been taken up and allocating a further 37ha will reduce the viability of these small sites due to oversupply (J13 is excluded from this 37 ha)..

- 2.17 SDLPR policies in respect of employment land allocations demonstrably do not create the conditions in which businesses can invest, expand and adapt.
- 2.18 The role and influence of Gloucester City should be recognised in the settlement hierarchy.**
- 2.19 The site selection process should include a realistic view on the delivery of sites over the plan period.**
- 2.20 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.**