

Our ref: JBB8744/C7487

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██████████ - Planning Policy Manager

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Sent via email - local.plan@stroud.gov.uk

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Dear ██████████

Stroud District Local Plan Review - Additional Housing Sites Consultation Symmetry Park, Gloucester

Background

We write on behalf of our Client, Tritax Symmetry to make representations to the Stroud District Council Local Plan Review – Additional Housing Sites Consultation. As you are aware Tritax Symmetry are promoting two Sites: land west of Gloucester Road, Haresfield ('Symmetry Park, West') and land east of Gloucester Road, Haresfield ('Symmetry Park, East') for the development of strategic employment to meet the needs of Stroud, Gloucester and the wider Gloucestershire region. Together these sites make up Symmetry Park, Gloucester ('the Sites').

We are pleased to enclose a Delivery Document (November 2020) and technical assessments which have been undertaken relating to the proposed development of Symmetry Park, Gloucester. The suite of technical assessments has been undertaken to evaluate the opportunities and constraints of the Sites, and the findings of these assessments have informed illustrative masterplans for the Sites presented within the Delivery Document which are deliverable in the short term to meet the immediate demand for employment.

Introduction

Tritax Symmetry is the Development Partner on Symmetry Park, Gloucester. Tritax Symmetry was formed following the acquisition of db symmetry by Tritax Big Box REIT plc, a FTSE 250 company, with a portfolio value of c£4.18Bn. The company has an entrepreneurial, experienced team that has been involved in some of the most dynamic and successful speculative and occupier-led industrial/logistics development schemes throughout the UK.

Tritax Symmetry are Gold Leaf members of the UK Green Building Council, and one of the first developers to commit to delivering all new developments to 'net zero carbon' in construction.

Although the current Stroud District Local Plan Review Consultation is focused on additional housing sites, we consider it important to draw your attention to the strong relationship between new housing, the demand for logistics and demand for employment.

The Consultation requests feedback on proposed spatial options and specific sites to meet a potential additional housing requirement. Additional warehouse and distribution space will be required if any of the spatial options and specific sites set out in the consultation are included as an allocation in the Local Plan, as additional homes will put more demand on the logistics sector.

Additional Homes & Logistics

Stroud District Council ('The Council') have taken a proactive approach to finding additional housing land which is likely to be required when the Governments revised standard methodology (method for calculating housing requirement) is confirmed.

The Council are proposing that their housing requirement would increase from 638 homes per annum, to 786 homes per annum when the revised standard methodology is approved. The Council have indicated that as a result of the proposed change to the way housing need is calculated, current monitoring shows that additional land for between 1,050 – 2,400 homes may be required between now and 2040 which will be the end of the Local Plan period.

As set out in the British Property Federation (BPF) report 'What Warehousing Where? - Understanding the Relationship between Homes and Warehouses to Enable Positive Planning' (March 2019)

“There is a clear link between homes and warehousing, both in terms of quantum and location, which must be recognised in policy. Households generate demand for goods of all types, from cars to carpets to coffee to clothes. In turn car manufacturers require component parts; cafes require coffee bean deliveries and so on. Logistics is the sometimes invisible but always essential tie between demand and supply within the economy. Without it we would be running on empty - without cars or coffee.”

As more homes are built the requirement for warehouse space to store the good and support the logistics sector will continue to grow exponentially. “What Warehousing Where” sets out that

“There is presently 69 sqft of warehouse floorspace for every home in England. If this relationship were to continue this would mean 21 million sqft of additional warehouse floorspace is required each year to match the Government’s annual target of 300,000 new homes.”

In addition, during 2020 the world has been affected by the Covid-19 pandemic which saw a national lockdown in the UK lasting 3 months. During this period the increase in online shopping soared with online sales between March to May 2020 hitting the 5-year growth forecast in just 3 months.

Online sales increased from 21.9% in March to 32.8% in May. (Savills UK Logistics Market Overview – Q3 2020). This increase resulted in an unprecedented strain on the logistics sector. The pandemic has accelerated an existing market trend for online shopping, and the change in consumer behaviour has now been established as habit.

Confidence within the industry that the online shopping habit is here to stay is highlighted in the take up of storage and distribution space in 2020 which has already reached record levels by Quarter 3. Take up in 2020 has totalled 38.6 million square feet which is 3.6% higher than the previous record in 2016 as a whole (Savills UK Logistics Market Overview – Q3 2020).

The demand for strategic employment sites to accommodate storage and distribution development is an immediate requirement and the more homes built in Stroud District the greater the need for more storage and distribution space to meet the demands of the consumers utilising the logistics sector.

Additional Homes & Employment

The development of new homes in Stroud District Council will increase the need for employment. The provision of new employment and a wide choice of employment will encourage workers to seek jobs closer to their home, and this undoubtedly supports the principle of sustainability and reducing the distance travelled to work.

In recent months the UK has entered a recession which was deeper than the financial crisis is 2008/09. This recession was the result of the Covid-19 pandemic and unemployment figures have risen significantly. Stroud District has seen unemployment in the 16 – 24-year-old age group rise by 197% between March and October 2020. (House of Commons – Briefing Paper (Number CBP 8748 – 10 November 2020).

New jobs are therefore not only required to meet the needs of people who are and will be living in Stroud District in the future, but are also required to address this significant rise in unemployment as a result of the pandemic and aid economic recovery.

As a result of the soaring popularity of online shopping, the warehouse and distribution sector supporting logistics is expanding to meet this demand and therefore new jobs are being created in this sector which can help to address unemployment and aid economic recovery.

Warehouse and distribution facilities provide a very diverse range of employment opportunities, a significant proportion of which are office based, IT and engineering-based roles.

The nature of the logistics sector has changed. Warehousing is no longer simply about the storage of product but is now focused on delivering complex supply chain solutions and accommodating all business functions under one roof. Logistics has evolved to encompass a far wider range of occupiers and employment opportunities than ever before. It encompasses every aspect of our daily lives and is an essential part of the infrastructure underpinning all other sectors of the economy.

In line with guidance contained in the Government's Employment Densities guide the employment development on Symmetry Park, Gloucester would create circa 2,500 jobs (based on Employment Density Guide Matrix (3rd Edition – November 2015).

Symmetry Park, Gloucester

Gloucestershire has a strategic position in the UK located at a crossroad between Wales and London, and the West Midlands and the South West.

Symmetry Park, Gloucester is located on land surrounding Quedgeley Interchange, where Junction 12 of the M5 intersects the B4008. The Sites are located within a 'strategic growth and development location' designated for strategic employment development in the Adopted Local Plan (Core Policy CP2) and the Draft Local Plan Review - November 2019 (Map 2 – The Development Strategy). The Sites are located within an area urbanised by industrial and commercial development, including the Gloucestershire Energy from Waste, and various employment uses including Gloucester 12 and St Modwen Park, Gloucester.

The sites formed part of the RAF Moreton Valence Airfield (Haresfield Airfield), a Second World War military airfield which opened in 1939 and closed in 1962, as such the Sites are topographically flat in nature.

Symmetry Park, West is 27 hectares in size and Symmetry Park, East is 21 hectares in size.

The combination of the Sites' location in Gloucestershire and proximity to the strategic highway network, and the topography and scale makes them ideal for large scale employment uses.

The National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) directs Local Planning Authorities to recognise that storage and distribution facilities have very specific site locational requirements, which essentially are large, flat sites able to accommodate large warehouses and easily accessible by road. Such sites are quite rare.

The NPPF at paragraph 82 identifies that policies should recognise and address the specific locational requirements of employment developments including that of storage and distribution which need to be in suitably accessible locations.

The Planning Policy Guidance goes onto state that

“Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour.”

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The Draft Local Plan and the Additional Housing Sites Consultation does not propose to allocate any sites which are as large in scale as the Sites at Symmetry Park, Gloucester and therefore no sites are proposed to be allocated to accommodate national or regional scale warehousing. We note that the Additional Housing Sites Consultation presents Whitminster (WHI014 Land at Grove End Farm) as a 'Potential Growth Point' for up to 2,250 dwellings, 13 hectares employment, local centre, primary school, community facilities and open space. Given the scale of the employment land proposed on the site at Whitminster, it is consider the employment uses likely to be developed on the site would be akin to small to medium employment uses and not the large scale strategic employment uses proposed on the Sites at Symmetry Park, East and West which are 21 hectares and 27 hectares respectively.

As such, none of the employment sites proposed for allocation by the Council are capable of accommodating the average unit size of 266,000 square feet required by the sector (Savills Data, 2019), and therefore cannot meet the specific requirements of the modern logistics sector, contrary to paragraph 82 of the NPPF.

The land south east of Junction 12 of the M5, fulfils all of the specific locational criteria for storage and distribution facilities which is recognised in National Planning Policy.

Summary

The logistics sector is an integral part of modern life. People have become more reliant on online shopping over the years, and even more so in 2020 during the Covid-19 pandemic, and therefore the demand for logistics is ever increasing. Underpinning the logistics sector is the need for modern warehousing and distribution space.

Symmetry Park, Gloucester can accommodate up to 2 million square feet of modern warehouse and distribution space which can help to address the immediate needs of the sector to meet consumer demands. The development of the Sites would provide a number of diverse employment opportunities for local people, helping to address the significant rise in unemployment in the District and support economic recovery.

Stroud District Council are now looking increase their housing requirement up to 2040 from 638 homes per annum to 786 homes per annum. Regardless of which spatial option or specific site the Council determines to propose as an additional housing allocation, any increase in homes within the District will further increase the need for warehouse and distribution space to support the demands on the logistics sector. This increase in houses will also undoubtedly increase the requirement for new employment to meet the needs of local people.

The employment land proposed within the Draft Local Plan (November 2019) and the employment land being considered as part of the proposed Whitminster site are not as large in scale as the Symmetry Park, Gloucester sites which are appropriate for large scale strategic employment uses which can meet a local and regional need.

Symmetry Park, Gloucester should be allocated in the Stroud Local Plan for the development of large-scale employment to meet the needs of Stroud, Gloucester and the wider Gloucestershire region.

Yours sincerely,
for RPS Consulting Services Ltd


Principal Planner

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cc:



Development Director – Tritax Symmetry
– Planning Director – Tritax Symmetry