

Consultation response form PART B:

If you have several different comments to make, you may wish to use a separate PART B sheet for each one (although you do not have to). If you use multiple PART B sheets, please make sure you fill in your name on each of them (you only have to fill out PART A once, as long as it is clearly attached to your PART B sheets when you submit the forms to us).

Your name

Your organisation or company

Your client's name/organisation
(if applicable)

The consultation is seeking views about whether the big issues identified within this paper are the right things to focus on and what options exist for tackling them. Are there other issues, options or opportunities that have been missed? **Please note: there is a separate form for you to fill out if your comment relates specifically to a site submission / proposed alternative site (download a copy of the sites form at www.stroud.gov.uk/localplanreview).**

We ask a series of questions (highlighted in pink boxes) throughout the consultation paper. Each of the questions is numbered. Please can you reference the question number(s) and/or the topic here:

Question number: See attached representation

Please use this box to set out your comments:

(Attach additional sheets of paper or expand this box if you need to)

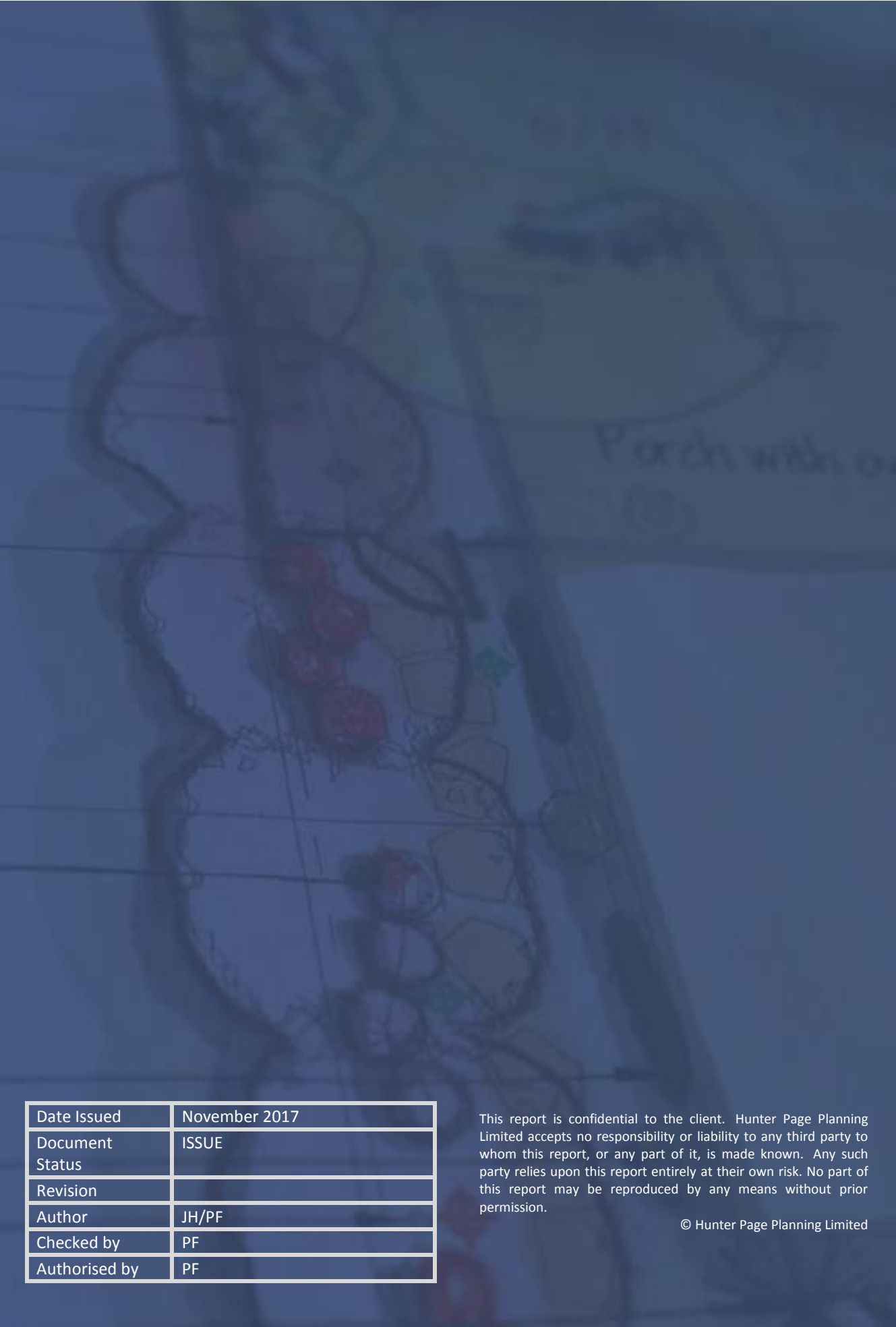
See attached representation

Stroud District Local Plan Review

Issues and Options Paper

On behalf of Ecotricity Group Ltd • November 2017 • Reference 5012





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1.0 Introduction

- 1.1 This representation has been prepared by Hunter Page Planning (HPP) on behalf of Ecotricity Group Ltd in relation to the consultation on the Stroud District Local Plan Review: Issues and Options Paper. Ecotricity is the longstanding promoter of Land at M5 Junction 13, West of Stonehouse, and it proposed that the site is suitable for employment land and sports uses.
- 1.2 The site has been subject to a recent planning application for an 'Eco Park' which included the sports facilities proposed with this application but also a Green Technology Hub (B1/B2/B8 uses), additional indoor and outdoor pitches, transport hub and nature conservation area (application reference S.16/0043/OUT). A Revised Scheme is in the process of being prepared which removes the proposed employment land, the Nature Conservation Area, some of the sporting facilities and repositions the Stadium to the northern side of the A419.
- 1.3 The Stroud Local Plan was adopted in November 2015. The Local Plan identifies the housing, employment, retail and community development that is required to meet local needs up until 2031.
- 1.4 The adoption of the Local Plan was subject to the Council undertaking an early review, and the Council is now starting the process of reviewing the current Stroud District Local Plan. The Issues and Options version of the Local Plan Review is currently undergoing consultation. This plan presents the opportunity to identify emerging issues and identify ways of distributing and managing future development needs.
- 1.5 The Issues and Options Paper poses a series of questions and this aims to specifically answer the questions raised within the report.
- 1.6 Accompanying this submission is an updated assessment Employment Land Availability, which demonstrates that there is a significant shortfall in employment land in the District, against the adopted Local Plan requirement. The Stroud District Local Plan Review provides the opportunity for this to be rectified.

Structure of this Report

- 1.7 Section 2 of this Statement looks at the overarching policy context for the District, the county and the country more generally.

- 1.8 The following sections in this report correspond with the chapters in the Issues and Options Paper. Section 3 looks at needs, namely in respect of the local economy and jobs.
- 1.9 Section 4 looks at the future growth strategy for the area. It is acknowledged that the site is identified as a site with future potential and more information will be given justifying this position.
- 1.10 Section 5 looks at background evidence and information, assessing the background studies that have been undertaken.
- 1.11 Section 6 provides a summary of the employment land position and conclusion on the site's suitability to meet the shortfall.

2.0 Planning Policy Context

National Planning Policy and Guidance

2.1 The Core Policies of the Framework (paragraph 17) set out that the planning system should:

“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business community.”

2.2 Paragraph 19 sets out that:

*“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. **Therefore significant weight should be placed on the need to support economic growth through the planning system.**”* (our emphasis)

2.3 Paragraph 21 states that:

“Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:

- *Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- ***Set criteria; or identify strategic sites, for local inward investment to match the strategy and to meet anticipated needs over the plan period.***

2.4 Paragraph 158 of the Framework states that:

‘Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for

housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.’ (our emphasis).

2.5 With regards to economic development, the Framework requires that Local Plans use their evidence base to ensure that the existing and future supply of land available for economic development is sufficient and suitable to meet their economic needs (paragraph 161).

2.6 The Planning Practice Guidance: ‘*Housing and economic development needs assessments*’ highlights that in understanding the current market in relation to economic and main town centre uses, plan makers should liaise closely with the business community to understand their current and potential future requirements. Plan makers should also consider:

- *The recent pattern of employment land supply and loss to other uses (based on extant planning permissions and planning applications). This can be generated through a simple assessment of employment land by subareas and market segment, where there are distinct property market areas within authorities.*
- *Market intelligence (from local data and discussions with developers and property agents, recent surveys of business needs or engagement with business and economic forums).*
- *Market signals, such as levels and changes in rental values, and differentials between land values in different uses.*
- *Public information on employment land and premises required.*
- *Information held by other public sector bodies and utilities in relation to infrastructure constraints.*
- *The existing stock of employment land. This will indicate the demand for and supply of employment land and determine the likely business needs and future market requirements (though it is important to recognise that existing stock may not reflect the future needs of business). Recent statistics on take-up of sites should be consulted at this stage, along with other primary and secondary data sources to gain an understanding of the spatial implications of ‘revealed demand’ for employment land.*
- *The locational and premises requirements of particular types of business.*
- *Identification of oversupply and evidence of market failure (e.g. physical or ownership constraints that prevent the employment site being used effectively, which could be*

evidenced by unfulfilled requirements from business, yet developers are not prepared to build premises at the prevailing market rents).

- 2.7 With regard to the type of employment land that is needed the Guidance recognises that the increasing diversity of employment generating uses (as evidenced by the decline of manufacturing and rise of services and an increased focus on mixed use development) requires different policy responses and an appropriate variety of employment sites.

Stroud District Local Plan November 2015

- 2.8 The adopted Local Plan sets out key economic policies and priorities in Chapter 5. The title page from this Chapter simply states:

*“Supporting economic growth by delivering a range and mix of employment uses, sites and types **in the most appropriate location** for that particular use, supported by and integrated with housing and other community infrastructure.”* (our emphasis)

- 2.9 The economic future of the District is set out in strategic objective SO2, which states:

“Providing for a strong, diverse, vibrant local economy that enables balanced economic growth, coupled with enhanced job opportunities across the District.”

- 2.10 The Local Plan’s vision for employment and economic growth looks to support sustainable economic growth and not act as an impediment. It recognises that Local Plans should be proactive in meeting the development needs of business (paragraph 2.39).

- 2.11 Paragraph 2.41 of the LP sets out that there is a need to provide between 6,800 and 12,500 net new jobs between 2006 and 2031. Although the LP recognises that there may be a significant oversupply of employment land to meet these requirements, it acknowledges that the models used in reaching these figures **take no account of pent up demand, failures in the property market or the need for a range of sites and locations to provide for choice and continuum of supply beyond the Plan period.**

- 2.12 The LP acknowledges that based on past take-up rates, there is a need to provide about 58ha of **additional** employment (B1-B8) land between 2006 and 2031 (para 2.41 of the LP).

- 2.13 Core Policy CP2 is all about strategic growth and new development locations, seeking to concentrate most of the District’s new growth at a series of strategic locations. The policy

specifies that the strategic sites will be made up of locations at the principal settlements and key employment market areas such as the M5/A38 Corridor and south of Gloucester.

2.14 The policy itself seeks to allocate 58ha of additional employment land up to 2031. This allocation is made up of four new employment sites at:

- Quedgeley East: 13ha
- North East Cam: 12ha
- Sharpness: 17ha
- Stroud Valleys Intensification
- West of Stonehouse: 10ha

2.15 Policy CP11 relates primarily to the delivery of new employment development within the District. The employment policies and objectives of the Plan have been designed to have regard to both strategic and local business needs and aim to facilitate a flexible supply of land to assist in moving forward to a low carbon economy.

2.16 The Policy identifies that with too few jobs in the District, and jobs that only cater for a lower skills base, are factors that have led to considerable movement of higher skilled workers out of the District to other centres of employment such as Cheltenham and Bristol which are accessible and convenient centres for high skilled employment.

2.17 The Local Plan recognises that the District has a reputation for advanced technology and creative skills and accordingly needs to provide new and attractive employment sites to encourage the development of these sectors within the District.

2.18 The text of the Policy itself, seeks to provide new employment development through a range of sites and premises across the District.

Strategic Economic Plan for Gloucestershire March 2014, GFirst LEP

2.19 The Strategic Economic Plan (SEP) for Gloucestershire was adopted in March 2014 and provides an over-arching vision for economic growth in the County. The LEP acts as the voice of businesses in the county and a link between private, public and voluntary sectors.

- 2.20 The SEP aims to accelerate economic growth and address particular challenges faced in the County. Some of the challenges identified are how to support the growth of knowledge-intensive sectors, the need for innovation to be a stronger driver of productivity and how to capitalise on our entrepreneurial culture.
- 2.21 Whilst the SEP recognises that Gloucestershire has a diverse and resilient economy with particular expertise in renewable energy, it also recognises that some of the threats that the County currently face relate to the lack of suitable premises for high value businesses and an insufficient number of attractive development sites.
- 2.22 To address these threats the SEP has set a bold target for growth which is above the national average and in order to achieve this target has set out ambitious projects for growth.

One of these projects is establishing a 'Growth Zone' along the M5 corridor, the aim of which is:

"The primary aim of the Growth Zone is to ensure the availability of quality employment land in proximity to the M5 motorway attractive to business and with excellent connectivity throughout Gloucestershire and the rest of the UK. This will serve the latent demand in the market place and provide space required to enable Growth Hub supported business growth."

and

"Focused on the M5 motorway corridor, the Growth Zone will provide space for sustainable business expansion by ensuring the availability of employment land in the best locations in the county with the necessary transport infrastructure essential to attract and retain high value-added business."

Eastington Parish Council, Neighbourhood Development Plan 2015-2031

- 2.23 The Neighbourhood Plan has been designed to closely follow and be in conformity with the Stroud District Local Plan adopted in November 2015. As a consequence of this, the Neighbourhood Plan is based on the employment provisions of the Local Plan.
- 2.24 The settlement boundaries in the Neighbourhood Plan are closely aligned to those defined in the Local Plan. These reflect the strategic growth options in the Local Plan.

3.0 Needs: Local Economy and Jobs

3.1 Section 2.1 of the Issues and Options Consultation focusses on the local economy and jobs and sets out the key priorities for the District. It highlights that the amount and nature of the requirements will be subject to detailed analysis, but have asked if there are specific business requirements or economic needs which are not being met within the District due to a lack of suitable sites.

3.2 Each of the questions within this section will be addressed in turn.

Question 2.1a What do you think are the biggest challenges facing the local economy in Gloucestershire for the future? How can we help to address these? Does Stroud District have a specific role to play, relating to business start-ups and specialist technologies or should we seek to compete with other locations for growth.

3.3 At a county level, GFirst LEP's Strategic Economic Plan (SEP) has undertaken a SWOT analysis of economic growth in Gloucestershire. The weaknesses identified are as follows:

- Low recent levels of economic growth;
- Low productivity relative to the UK;
- Under-representation in knowledge-intensive services;
- Under exploited export potential;
- Pockets of county with persistent deprivation and high unemployment;
- Gaps in high speed broadband coverage in rural areas;
- Gaps in reliable mobile phone network coverage;
- Barriers to services in rural areas;
- Low average number of patents per head;
- Failure to retain our talented young people;
- Gaps in business support and lack of knowledge of how to access services;
- High car dependency;

- High levels of commuting within the county;
- Congestion problems around A417 – The ‘Missing Link’; A46 Tewkesbury to M5; A40 to west of River Severn; A40 between Gloucester and Cheltenham; Cheltenham and Gloucester centres;
- Limited direct train services to London
- Relatively high house prices a barrier to first time buyers entering the property market

3.4 At a District level, Paragraph 13 to 49 of the Adopted Local Plan highlights the key issues facing the local economy in the District. In summary, these challenges are as follows:

- Too few jobs within the District itself to meet the needs of the resident workforce
- High levels of daily commuting out of and into the District, but overall there is a significant net outflow of people working in larger centres like Bristol, Gloucester, Cheltenham and Swindon.
- The District needs to attract more knowledge-based industries, enabling greater employment opportunities for the highly skilled and well qualified working population.
- Stroud has a higher percentage of factory and warehouse stock and less office and retail floor space than either the county or South West average. There is a need to rebalance the stock to help meet the skills of the resident population and to reflect changes in employment demands.
- There is an issue of quality of employment stock in the District. Stroud District lacks, in particular, modern office premises with business support services and freehold small industrial sites.
- A large proportion of the District’s current protected employment land lies along the valley bottoms to the east, west and south of Stroud, where sites are constrained and transport and infrastructure are inconvenient for many traditional industries.
- Many of the District’s historic mills are unsuited to modern industry, and some have fallen vacant, but converting them solely for other uses could undermine the District’s employment base.

- Many of the current employment sites are on low-lying land, close to rivers; some are already flood-prone and future climate change may increase the risk.

3.5 It is evident that the District has nurtured and fostered many advanced technology and creative skilled businesses, and the adopted Local Plan recognises the need to build upon this business sector over the next plan period in order to retain and grow a prosperous and resilient economy for the future that is not dependant on commuting out of the District for jobs. The Local Plan therefore seeks to rectify this situation by increasing and diversifying its existing employment base.

3.6 As above, the existing employment base provides a high percentage of factory and warehouse stock with a limited amount of office and retail space. Furthermore, the quality of the existing office provision is of very low quality and accordingly the ambition is to rectify this balance by providing more quality office and retail space in appropriate locations. The Plan's objective is to provide further employment sites to help grow the advanced technology and creative business sector.

3.7 The SEP recognises that Gloucestershire has a prosperous and resilient economy set within a highly attractive natural environment. On many of the headline indicators of economic performance, Gloucestershire performs at, or above, the national average. Gfirst LEP is in the top three LEPs for employment within knowledge intensive manufacturing and services, and it has highest percentage in all LEP regions of employees in high and medium technology manufacturing, as well as an abundance of SME's in cyber security and creative industries, including digital.

3.8 In order to support the growth of these businesses within the County, Stroud District does have a role to play. There needs to be new, higher quality employment land that is planned in locations that are in suitable, accessible and attractive locations for modern business use to assist in nurturing high value business use and to stem the amount of out-commuting that currently occurs.

Question 2.1b Do you think there is a need for further employment land allocations? If yes what types of premises are required and where should they be located?

3.9 Yes, whilst the Local Plan has attempted to allocate a range of new employment sites, it is apparent from an analysis of these sites that they, alone, will fail to address the economic problems associated with the District.

3.10 As part of the evidence base for the Local Plan, the Council has published an updated Employment Land Availability Report (ELA) which covers the period until April 2017. However, this ELA has been scrutinised within the accompanying report, in order to provide a more accurate picture of the sites that are deliverable for employment purposes.

3.11 The accompanying assessment considers the actual employment land available in the District, by assessing the claimed employment land that has been developed, commitments, as well as employment land losses that are reported in the 2017 ELA. Consideration of the actual employment land that will be delivered through the LP has also been assessed.

3.12 Following the scrutiny of these sites, the following conclusion has been drawn:

	SDC Assessment	HPP Assessment
Completions (B class uses only)	24.8	18.75
Commitments (B class uses only)	44.31	38.3
Local Plan Allocations without permission	21.40	13.7
Gross Land Supply	90.51	70.75
Losses (Actual)	25.85	25.85
Losses (Potential)	0	17.64
Net land supply	64.66	27.26
Local Plan Requirement	58	58
Total Surplus/Shortfall	+6.66	-30.74

3.13 The above demonstrates that the Council has a significant shortfall against the Local Plan Requirement. It is evident that the strategic requirement for 58ha of net additional employment land to be provided between the period 2006-2031, cannot be met with the adopted development strategy. Equally, more employment land is being lost to other uses than had originally been anticipated and these losses will need to be replaced in order to maintain a balance between land uses.

3.14 It is therefore clear that there is a need to provide new employment sites in the District. More specifically there remains an urgent need to provide high quality employment land in the right place, to address the employment issues identified in the LP, particularly as many of the District's existing employment sites are constrained and in inaccessible locations.

3.15 As above, there needs to be new, higher quality employment land suitable for knowledge intensive industries, in suitable, accessible and attractive locations for modern business use. It is suggested that the employment distribution reflects the requirements of business and strategic

growth objectives set out in the SEP which identifies that there are major opportunities for future economic growth along the M5/A38 corridor, which is the focus for modern office and commercial demand.

3.16 The GFirst SEP identifies the M5 corridor as a 'Growth Zone' and states:

'The concentration of employment on a fewer larger sites in the M5/A38 corridor and at Stroud will mean that development can be located close to strategic road and rail networks and in places that business wants to be. It will create the opportunity to provide a range of units from large warehousing and distribution units down to offices and smaller industrial units, possibly as start-up businesses.' (para 2.13)

3.17 One of the Strategic Objectives of the Local Plan is to concentrate employment on fewer larger sites in the M5/A38 corridor and at Stroud, in order for development to be located close to strategic road and rail networks and in places that business wants to be. It states that this will create the opportunity to provide a range of units from large warehousing and distribution units down to offices and smaller industrial units, possibly as start-up businesses. The overall strategy is generally consistent with the SEP; however, it is clear that there is a need for additional sites to be allocated in order to meet the level of growth that the Local Plan anticipates.

Question 2.1c Do you think locating growth adjacent to M5 junctions should be supported; or would continuing expansion of employment land at existing settlements/sites be preferable?

3.18 Paragraph 180 of the NPPF highlights that *'Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships'*. It is clear that the LEP want to focus growth along the M5 Corridor and the Local Plan should reflect this strategy.

3.19 Section 4.1.3 of the SEP states the following:

'The primary aim of the Growth Zone is to ensure the availability of quality employment land in proximity to the M5 motorway attractive to businesses and with excellent connectivity throughout Gloucestershire and the rest of the UK. This will serve latent demand in the marketplace and provide the space required to enable Growth Hub supported businesses to grow. ...Focused on the M5 motorway corridor, the Growth Zone will provide space for sustainable business expansion by ensuring the availability of employment land in the best locations in the county with the necessary transport infrastructure essential to attract and retain high value-added businesses.'

- 3.20 It is considered that growth adjacent to M5 junctions should be supported. These sites represent the preferred location of businesses, are sites that are generally flat and relatively free from constraints, and extremely accessible. Modern businesses and developers want easily developable, accessible and usually prominent sites for their premises with companies moving from an existing property to provide themselves with better, more efficient, cost effective accommodation of an approximate size. An appropriate site to deliver accommodation such as this is the land promoted by Ecotricity at M5 Junction 13, West of Stonehouse, which will be considered in full in the following section.
- 3.21 In respect of existing sites within the District, these tend to be historic sites which are less attractive to businesses, and generally less accessible. This is recognised within the Stroud District Employment Land Study produced by AECOM/BE Group in February 2013 (ELS), which informed the Local Plan of the employment position in the District.
- 3.22 Overall it was concluded that Stroud District remains prosperous with strong prospects but must look at creating a better balanced and resilient economy if it is to maintain or improve upon this position. In particular, paragraph 12.24 of the Employment Land Study identified:
- The sector balance needs to improve to reduce dependence on manufacturing to capture a bigger share of national/county growth in business services;
 - Business services is a broad sector which is forecast to grow in every comparator area and nationally. Stroud is significantly under-represented in this sector and should move to balance the situation to reduce dependence on manufacturing;
 - Stroud has a highly skilled but mobile resident workforce – more of them would work in Stroud rather than out-commute if there was a better balance of sectors including a bigger service sector, this would lead to more sustainable travel to work patterns;
 - The high spend potential of the resident population is a significant economic asset and Stroud District could consider capturing more of this through a better retail/culture/food drink offer in its town centres – especially Stroud town itself. High-tech manufacturing is in decline but is still significant as a driver of employment and GVA in Stroud. There is still a strong comparative advantage around Stonehouse and evidence of convergence and growth with environmental technologies. This should be encouraged and can help embed high value sectors in the economy; support the development of a highly skilled specialist workforce and stimulate clustering;

- Stroud District has an extremely high business density by national standards and new company birth rates are back on the rise. Stroud could encourage more of this and position itself as an entrepreneurial District – an ideal place to start new businesses – playing to the strengths of the high quality lifestyle, good connections, and the proposed upgrade in broadband. New start-up facilities developed in premises like Ebley Mill could play a key role here; and
- Demand led, sector specific workplace skills development is a priority and will be required to realise the District’s potential in its priority sectors.

3.23 The report concludes that Stroud District currently has an undersupply of premises suited to modern business. Moreover many modern advanced manufacturing and technical jobs are also forecast to grow. Therefore, in order to provide a more balanced economy and capture some of the highest value sectors in the District it was recommended that there should be higher quality space for the knowledge economy.

3.24 As such, rather than grow existing employment sites which are not suitable for modern business needs, it is suggested that the employment distribution reflects the requirements of business and strategic growth objectives set out in the SEP which identifies that there are major opportunities for future economic growth along the M5/A38 corridor.

Question 2.1d Should there be increased flexibility to allow other job generating uses on all employment sites or would this limit the options for those companies operating in the B classes? Should increased flexibility be allowed only on some sites? Please specify any sites where a more flexible approach could be taken. Alternatively, a percentage threshold, in terms of units or site floorspace, could be identified for non B class employment uses, which might help to provide services to other businesses?

3.25 Whilst it is acknowledged the Local Plan should include some flexibility, there is still a requirement to specify sites that can deliver traditional B Class uses. The current approach identifies key employment sites for B Class uses only, as well as additional regeneration sites which are appropriate for a mix of uses. This approach is supported.

3.26 It is clear from the assessment of the Council’s actual and potential losses (within the accompanying Employment Land Assessment), that a number of allocated employment sites have been lost in recent years, with the Council accepting alternative uses on the site.

3.27 Whilst it is appropriate for flexibility to be promoted on some sites (perhaps those that are dated/have been vacant for several years), it is important that sites for traditional B class uses are

safeguarded to ensure that employment needs can be delivered. Any alternative uses on these sites can then be considered on a case by case basis through the development management process.

4.0 Future Growth Strategy

4.1 Section 3 of the Issues and Options looks at the future growth strategy. It recognises that the amount of future housing and employment growth is yet to be identified but looks at the strategy for distributing further growth.

Question 3.1 How should we meet future development needs?

- **Option 1: Continue to concentrate housing and employment development at a few large sites located adjacent to the main towns in the district**
- **Option 2: Take a more dispersed approach with some medium sized housing and employment sites on the edge of the larger villages, as well as towns**
- **Option 3: Disperse development across the district with most villages including at least one small to medium site allocated to meet local needs**
- **Option 4: Identify a growth point in the district to include significant growth, either as an expansion of an existing settlement, or to create a new settlement**
- **Option 5: Do you have an alternative strategy option that you would like us to consider? Do you have a preferred option? Or would some combination of these approaches be the best way to meet our future needs? Please explain why.**

4.2 It is considered that the approach to concentrated development (Option 1) is an appropriate strategy which should be continued through the Review. The concentration of employment land into a few preferred locations will also assist in delivering better quality employment land in the right locations. For Stroud District, market intelligence also suggests that clustering new businesses into high quality, accessible business sites will also foster the growth of knowledge intensive businesses and thereby deliver better economic gains for the District. Clustering of businesses in one location will also allow the sharing of knowledge and foster quicker growth. Sustainability of new employment sites will also benefit through a large quantum and concentration of development as this will be more able to support local infrastructure and services improvements.

4.3 The Issues and Options highlights that *'concentrating mixed-use development close to the District's larger settlements means new residents are able to access existing services and facilities. Meanwhile, the relatively large scale of each new development may mean that new facilities and amenities (e.g.*

a new primary school, public open spaces, community orchard or allotments, a doctor's surgery, nursery, neighbourhood shops) can be integrated alongside new homes and jobs –which benefits the existing settlement's community as well as occupants of the new development.'

4.4 Paragraph 85 of the Inspector's Report for the Local Plan states the following:

'The development strategy is effective, locally distinctive and appropriate for Stroud district. It is justified with robust, proportionate and credible evidence, particularly in terms of the proposed amount of housing and employment development. It is also positively prepared and consistent with national policy, and provides a soundly based framework for the strategic policies and proposals that follow. Similarly, the underlying strategy of concentrating most new development at strategic mixed-use developments focused on the larger, more sustainable settlements, represents an appropriate, effective, deliverable and soundly based strategy, resulting in a sustainable pattern of development, in line with national policy.'

4.5 It is therefore considered that the approach to concentrating housing and employment development at a few large sites located near to main towns in the district is appropriate. However, in respect of employment, the preferences of businesses (including accessibility) also need to be considered and these sites are not necessarily adjacent to settlements. In accordance with the LEP's Strategic Economic Plan, it is considered that the M5 corridor is a suitable and accessible location for new economic development. As such, whilst development should be focussed at locations which are (or can be made) sustainable, there needs to be some flexibility in the wording to ensure that sites close, but not necessarily adjacent, to main towns, are not automatically ruled out.

4.6 It is therefore considered that new employment growth should be concentrated to ensure that large, good quality business parks are developed that allow the clustering of knowledge intensive businesses in Stroud. In accordance with the established objectives in the Local Plan and the Strategic Economic Plan, it is considered that employment growth points should be located within the M5 Growth Corridor and in particularly on Junction 13 of the M5 (M5/A419).

Question 3.4 Do you agree with the current hierarchy-based approach towards identifying settlements suitable for different levels of development? Is there a different approach you would prefer? Do you agree with the different tiers identified in the current Local Plan and the scale of development proposed for each tier? Are any of the settlements in the wrong tier and, if so, for what reason?

4.7 Yes, generally development should be distributed towards settlements which are in sustainable locations. Generally the tiers identified are considered appropriate, and it is considered that 1st tier settlements should be the focus for further growth. However, this strategy needs to be coupled with achieving a suitable employment growth point, and as identified above, a larger quantum of development is far more likely to be able to support infrastructure and services improvements. Therefore, new employment growth areas should be centred on settlements in 1st tier settlements that are within the growth zone and offer accessible and attractive employment sites to sustain the District's employment growth for the future.

4.8 The Inspectors Report for the Local Plan highlights the following in respect of the settlement hierarchy:

'Core Policy CP3 sets out the settlement hierarchy for the district, ranging from the larger Accessible Local Centres in the 1st tier (Stroud, Stonehouse, Cam & Dursley) and Local Service Centres (2nd tier) to Unclassified Settlements (5th tier). The main issue is whether this establishes an appropriate, effective, sustainable and soundly based settlement hierarchy which reflects the existing and future role of these settlements, helping to concentrate growth in those settlements that already have a wide range of services and good accessibility.

The detailed categorisation of settlements involves some judgements. Five tiers of settlements could be seen as too many, but it helps to distinguish the roles the various settlements play in the hierarchy and identify those which are more appropriate for strategic growth. Some participants press for levels of growth to be apportioned to each settlement or tier of settlements. However, this would reduce flexibility, since the level of development depends more on the suitability, availability and developability of potential sites; many of these settlements have important constraints, including landscape, AONB, topography and infrastructure, which may preclude large-scale or strategic developments. The overall strategy focuses most large-scale and strategic development at the 1st-tier settlements, which inevitably results in settlements lower down the hierarchy being allocated less development. The hierarchy also recognises the future role that some expanding settlements will play, such as Hunts Grove and Stonehouse, where major strategic developments are proposed.

As for specific settlements, since Stroud is by far the largest settlement in the district, there is a case to elevate it above other settlements in the hierarchy. However, given the physical, landscape, topographical and environmental constraints in and around the town, this could imply that the town should accommodate more strategic development in inappropriate peripheral locations. The SDLP acknowledges that Stroud is the principal settlement, providing a wide range of strategic facilities, but this role is shared by other settlements in this tier of the hierarchy; all satisfy the criteria for

inclusion as 1st-tier settlements, and grouping them together provides flexibility in the spatial distribution of new development. The hierarchy is not simply based on population, but also relates to the role each settlement plays, including strategic employment, retail, community facilities, accessibility and overall sustainability.

Overall, SDC has achieved a reasonable balance in terms of the settlement hierarchy, concentrating new development at those larger, more sustainable settlements which have the potential to accommodate strategic development. With the recommended amendment [MM015], Policy CP3 establishes an appropriate, effective, sustainable and soundly based settlement hierarchy which reflects the existing and future role of these settlements.'

Question 3.6 Read through the settlement summaries over the following pages and tell us whether you agree with the potential broad locations for growth, if future housing, employment or community facilities are needed. Where more than one location is identified you can tell us which is the best option.

- 4.9 The site 'Land at M5 Junction 13, West of Stonehouse', has been identified as a 'broad location with future potential' for employment and community uses within the Stonehouse Cluster. The inclusion of the land for employment purposes is supported by Ecotricity Group, who have been actively promoting this land for employment purposes, as well as a new stadium and additional pitches for Forest Green Rovers. An assessment of the site is undertaken below, before commenting on the deliverability of the site.

Site Location and Description

- 4.10 The site is situated to the west of Stroud and Stonehouse and occupies an area immediately adjacent to Junction 13 where the M5 intersects the A419. The site comprises land either side of the A419. The site is immediately adjacent to the West of Stonehouse allocation, which now has planning permission for mixed use development comprising of up to 1,350 dwellings and 10.7 hectares of employment land.
- 4.11 The site is flat and low-lying given its proximity to the River Severn and comprises predominantly of large agricultural fields separated by hedgerows and trees along the respective boundary lines. Part of the southern parcel of the site is situated within the Industrial Heritage Conservation Area. Some of this land is also within Flood Zone 2/3. The site does not fall within any other landscape or environmental designations.

- 4.12 In respect of landscape, a Landscape Sensitivity Assessment was commissioned by Stroud District Council to support the 2017 SALA, and forms the evidence base for the Local Plan. The northern parcel (identified as ST05) has medium/low sensitivity to employment, the lowest landscape sensitivity of all land around Stonehouse, with the southern parcel (identified as ST04) medium sensitivity to employment. Both the sites are less sensitive in landscape terms to the majority of land around Stonehouse.
- 4.13 In terms of available land, the attached plan shows a gross site area of 32ha available for employment. This does not currently exclude land within the Conservation Area and Flood Risk so the net area available for employment land may be adjusted accordingly.
- 4.14 The site offers excellent accessibility and transport links with its proximity to Junction 13 of the M5 motorway and also the A419 which intersects the site. The site also benefits from good access to existing public transport networks which will ensure that there is a choice of transport modes to the site, other than the private car. The location of the site is consistent with the locational criteria set out both in the SEP and the Local Plan and creates a large and deliverable volume of development within the 'Growth Zone' that will have the ability to create a high quality business park across a range of sectors.

Planning History

- 4.15 As set out above has been subject to a recent planning application for an 'Eco Park' which included the sports facilities proposed with this application but also a Green Technology Hub (B1/B2/B8 uses), additional indoor and outdoor pitches, transport hub and nature conservation area (application reference S.16/0043/OUT). A Revised Scheme is in the process of being prepared which removes the proposed employment land, the Nature Conservation Area, some of the sporting facilities and repositions the Stadium to the northern side of the A419.
- 4.16 As such, the site has been robustly assessed in respect of its ability to deliver employment and sports use. Considerable technical work has been undertaken on the site, and the application submission is accompanied by a number of technical reports and an Environmental Statement which robustly assesses the proposals and the likely environmental impacts of any development. This highlights that any likely significant effects of the proposal can be designed out.

Assessment of Deliverability

- 4.17 The promotion of this site for employment purposes is twofold - firstly to meet the needs of Ecotricity and secondly to attract new businesses to the district to reduce out commuting. Ecotricity is an existing business user in the District who operates a high technology business, developing cutting edge green technology for a low carbon future and generating a large number of high skilled jobs. Ecotricity already has a track record of job creation within the District and seeks to expand upon this in the future through the creation of new business accommodation in an accessible and suitable location to sustain future growth. Whilst additional accommodation is needed at Junction 13 to support Ecotricity's future growth and expansion, the Company is also committed to retaining a strong presence in Stroud town centre as its primary headquarters building.
- 4.18 The proposed development will therefore directly and unequivocally address the three economic problems directly identified in the Local Plan, those being; the creation of high quality of employment land; retaining and developing more employment land and buildings for knowledge and advance technology businesses; and reducing the amount of out-commuting from the District.
- 4.19 In terms of the deliverability of this site in contributing towards the employment needs of the JCS area, the sites suitability, availability and achievability will be assessed. This has also been undertaken within the Council's 'Strategic Assessment of Land Availability 2017' (SALA), which will be referred to where necessary.

Suitable

- 4.20 In terms of the site's relationship with the settlement hierarchy in the District, the site is an extremely sustainable and accessible location for employment development. Situated long the M5/A419 corridor, the site is ideally located to the west of Stonehouse (a First Tier settlement) which lies at the heart of the Stonehouse cluster (as defined in the Local Plan) and has a close relationship with nearby Stroud. The site is also situated within the Growth Zone identified by the SEP.
- 4.21 Around 12% of the District's total population live within the parishes of the Stonehouse cluster (more than 13,400 people). Of these, over 7,700 are residents of Stonehouse itself (census 2011), making it the District's second most populous town. Furthermore, the site is situated adjacent to the strategic allocation at West of Stonehouse and once complete, this will extend the settlement towards the site.

4.22 As demonstrated by the technical reports for the application and the ES, the application site has no physical constraints that would prevent or delay development coming forward. The site is flat land, is suitably and sustainably located and would create high-quality employment space in an area that businesses find attractive. Accordingly, the site is clearly a suitable location for employment development. This conclusion has been agreed within the SALA which states:

4.23 The SALA concludes the following in respect of suitability:

Although not currently policy compliant, the part of the site outside of the conservation area, floodplain and key wildlife site has no overriding physical constraints or potential impacts preventing employment or community / sports uses within a well landscaped A419 corridor, should the Local Plan strategy identify the need for growth in this location. The restoration of the canal with open space uses would be appropriate within the conservation area to the south. Buffers would need to be provided with the M5, the A419 and sensitive buildings in Westend and Chipmans Platt. Transport mitigation measures are also likely to be required.

Available

4.24 The site is un-used, in single ownership, and is being actively promoted by a developer. There are no legal or ownership problems or significant constraints which could limit development, as demonstrated by the planning application. It can, therefore, be considered to be available now.

4.25 This is agreed by the SALA which states that '*planning application has been submitted demonstrating that the site is being actively promoted for development.*'

Achievable

4.26 As identified within this Statement, there is a clear requirement for high-quality employment land across the District; development in this location could be delivered quickly to address the identified shortfall.

4.27 Employment and community use represents a viable future use for the site (as demonstrated by the planning application), which can be delivered quickly. As such, development of the site can be considered achievable. This has been agreed within the SALA.

Deliverability Summary

- 4.28 It has been demonstrated within the application documents and the Council's evidence base that the site is suitable, available and achievable for employment and community uses.
- 4.29 It is apparent that the Council needs to find additional employment land within the District in order to meet the needs identified by the Local Plan. The site has the ability to be delivered quickly for modern business premises in line with the strategy identified in the Local Plan and SEP.
- 4.30 The site is in a sustainable location consistent with both the development strategy of the Local Plan and the SEP.
- 4.31 The SALA identifies that the site has future potential for development, and summarises the sites potential as follows:

“Taking account of the character of the site and its surroundings, the northern part of the site and the southern part of the site outside of the conservation area could be developed for low/medium density employment development typically comprising a mix of single storey/two storey offices, light industrial and large format warehousing units, together with community and sports uses, within a well landscaped corridor. Within the conservation area, canal and open space uses would be appropriate. Within the conservation area, canal and open space uses would be appropriate.”

- 4.32 In line with this conclusion, the site is deliverable for employment uses in a manner which is consistent with local and national policy.

5.0 Background Studies

Question 4.1 Are there any specific additional local studies or data that you believe are needed to inform the Local Plan review? Have you any advice on the scope or content of any of these studies? Have you prepared, or are you preparing your own studies, which may help to inform the Local Plan?

- 5.1 Section 4.1 of the Issues and Options identifies that evidence base studies are required in order to identify future needs and generate options for delivery.
- 5.2 The Council's Strategic Employment Land Review (ELA) has been identified as an evidence study. However, has been scrutinised within the accompanying report, in order to provide a more accurate picture of the sites that are deliverable for employment purposes. The accompanying assessment considers the actual employment land available in the District, by assessing the claimed employment land that has been developed, commitments, as well as employment land losses that are reported in the 2017 ELA. Consideration of the actual employment land that will be delivered through the LP has also been assessed.
- 5.3 It is recommended therefore that the Council's ELA is amended to reflect the findings of the accompanying report.

6.0 Conclusion

- 6.1 The Local Plan identifies a number of shortcomings in the employment strategy within the District and given the size, location and dispersed nature of the existing employment sites and allocations, it is difficult to see how these employment shortcomings will be overcome. In addition, it has also been identified that there is also a significant shortfall in the overall employment land supply within the District that will only exacerbate these employment issues. It is evident that the strategic requirement for 58ha of net additional employment land to be provided between the period 2006-2031, cannot be met. The accompanying assessment demonstrates a significant shortfall (30.7ha) against the Local Plan Requirement.
- 6.2 Irrespective of the current shortfall in employment land, it is also clear that the employment allocations within the existing Local Plan do little to address the identified employment issues. The current allocations fail to provide new high quality employment land for the knowledge intensive industries, do not provide suitable and accessible employment sites, do not provide modern and suitable space that provides flexibility for new and existing businesses and do not provide large enough sites to enable the clustering of like-minded businesses.
- 6.3 Without the provision of concentrated high quality employment land in accessible locations within the identified Growth Corridor, it is inevitable that the District's employment problems will continue, worsening existing problems of out-commuting with a loss of high quality jobs and a failure to nurture and grow the indigenous entrepreneurial businesses.
- 6.4 It is therefore clear that there is a need to provide new employment sites in the District, concentrated within the Growth Corridor. This task needs to be addressed in the Local Plan review.
- 6.5 A suitable site is the land at M5 Junction 13, West of Stonehouse, being promoted by Ecotricity. Development of the site consistent with the general strategy for the Local Plan and the SEP, which identifies that there are major opportunities for future economic growth along the M5/A38 corridor, which is the focus for modern office and commercial demand.
- 6.6 The site has a gross site area of 32ha available for employment. It has been subject to considerable background work as part of the planning application, and has been robustly assessed in respect of its ability to deliver employment and community use. Considerable technical work has been undertaken on the site, and the application submission is accompanied by a number of technical reports and an Environmental Statement.

6.7 It is therefore recommended that the site represents a suitable and sustainable site to help meet the identified shortfall of employment land, and ensure that the Local Plan strategy for employment growth can be met.

Employment Land Assessment (Updated Report)

to accompany Representations to Stroud District Local Plan Review

Promoting Land at M5 Junction 13, West of Stonehouse

On behalf of Ecotricity Group Ltd • November 2017 • Reference 5012

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- 6.0 Conclusion on Employment Land Supply

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Executive Summary

This Employment Land Assessment has been prepared by Hunter Page Planning (HPP) on behalf of Ecotricity to provide an update in respect of the employment land position in the District in support of representations to the Stroud District Local Plan Review.

As part of the evidence base for the Local Plan, the Council has published an updated Employment Land Availability Report (ELA) which covers the period until April 2017.

This Assessment is designed to provide a detailed assessment of the actual employment land available in the District, by assessing the claimed employment land that has been developed, commitments, as well as employment land losses that are reported in the 2017 ELA. Consideration of the actual employment land that will be delivered through the Local Plan will also be assessed.

The table below demonstrates that following a rigorous assessment of the actual land supply, the Council has a significant shortfall when measured against the current Local Plan requirement.

Table 1	SDC Assessment	HPP Assessment
Completions (B class uses only)	24.8	18.75
Commitments (B class uses only)	44.31	38.3
Local Plan Allocations without permission	21.40	13.7
Gross Land Supply	90.51	70.75
Losses (Actual)	25.85	25.85
Losses (Potential)	0	17.64
Net land supply	64.66	27.26
Local Plan Requirement	58	58
Total Surplus/Shortfall	+6.66	-30.74

The primary differences in approach is that the HPP assessment includes 'potential losses' into the assessment. It also provides a more meticulous assessment of completions and commitments. In addition the HPP assessment has discounted a 7ha allocation at Sharpness as it is unlikely that this will be delivered for employment purposes without significantly more investment into Sharpness.

Even if a different approach were to be taken, with Sharpness being included in the land supply, there still would be a significant shortfall of employment land in the District (23.74ha).

In conclusion, after careful scrutiny of the employment land supply within the District, the strategic requirement for 58ha of net additional employment land to be provided between the period 2006-2031, cannot be met with the adopted development strategy.

It is therefore evident that there remains a need to provide new employment sites in the District. More specifically there remains an urgent need to provide high quality employment land to address the employment issues identified in the Local Plan.

1.0 Introduction

- 1.1 This Employment Land Assessment has been prepared by Hunter Page Planning (HPP) on behalf of Ecotricity to provide an update in respect of the employment land position in the District in support of representations to the Stroud District Local Plan Review.
- 1.2 Ecotricity is the longstanding promoter of Land at M5 Junction 13, West of Stonehouse, and it proposed that the site is suitable for employment land and community uses. The site has been subject to a recent planning application for an 'Eco Park' which included a Green Technology Hub (B1/B2/B8 uses), 5,000 capacity football stadium additional indoor and outdoor pitches, transport hub and nature conservation area (application reference S.16/0043/OUT).
- 1.3 This report assesses the available employment land in the District; through this assessment it is concluded that there is a significant shortfall in employment land in the District, against the adopted Local Plan requirement. The Stroud District Local Plan Review provides the opportunity for this to be rectified.
- 1.4 The Stroud Local Plan was adopted in November 2015. The Local Plan identifies the housing, employment, retail and community development that is required to meet local needs up until 2031.
- 1.5 The adoption of the Local Plan was subject to the Council undertaking an early review, and the Council is now starting the process of reviewing the current Stroud District Local Plan. The Issues and Options version of the Local Plan Review is currently undergoing consultation. This plan presents the opportunity to identify emerging issues and identify ways of distributing and managing future development needs.
- 1.6 As part of the evidence base for the Local Plan, the Council has published an updated Employment Land Availability Report (ELA) which covers the period until April 2017.
- 1.7 This updated assessment is designed to provide a detailed assessment of the actual employment land available in the District, by assessing the claimed employment land that has been developed, commitments, as well as employment land losses that are reported in the 2017 ELA. Consideration of the actual employment land that will be delivered through the Local Plan will also be assessed.
- 1.8 The summary and tables will be based on the 2017 ELA, in order for a direct comparison to be made between the Council's position and HPP's position.

PREVIOUS ASSESSMENTS

- 1.9 Previous Assessments of Employment Land Availability have been undertaken, in respect of Ecotricity's outline planning application at Land at M5 Junction 13 West of Stonehouse for a sports and green technology centre, known as Eco Park (S.16/0043/OUT).
- 1.10 HPP prepared an Employment Land Assessment (September 2016) and detailed discussions were held with Stroud District Council (SDC) and Nathaniel Lichfield and Partners (NLP) on behalf of Stroud District Council.
- 1.11 NLP prepared an Employment Land Review Report (December 2016) which considered the points of agreement and disagreement between the parties, and also set out its own position in respect of employment land availability.
- 1.12 Following this further work on the employment land supply it was agreed between both NLP and HPP agree that SDC currently has a shortfall of employment land against the Local Plan requirement of 58ha.
- 1.13 An Update Report was prepared by HPP in February 2017 which set out the primary differences.

THIS ASSESSMENT

- 1.14 This report assesses the Council's 2017 ELA in order to provide a detailed assessment of the actual employment land available in the District at this current time. Reference will be made to previous reports where necessary; however, this is a standalone assessment which will present the current position.
- 1.15 This report will use the assessment tables from the 2017 ELA for ease of reading.

STRUCTURE OF THIS REPORT

- 1.16 Section 2 is an assessment of the completions (Table 2a and 2b) and Section 3 is an assessment of the commitments (Table 3a and 3b) identified within the 2017 ELA, in order to identify if these sites genuinely constitute new employment development.
- 1.17 Section 4 assesses the employment losses as well as potential losses of employment land (Tables 4a, 4b, 4d and 4e), identified within the 2017 ELA.
- 1.18 Section 5 of the report provides an assessment of allocated sites within the Stroud Local Plan, including a review of planning applications on the site and any market intelligence to illustrate if the site is likely to come forward.
- 1.19 Section 6 provides a summary of the employment land position and conclusion on the overall supply.

2.0 Assessment of Completions

- 2.1 The 2017 ELA provides a detailed list of land that has been developed for employment purposes between 2006 and 2017.
- 2.2 For the purposes of this report, only comparable B class land has been assessed in order to consider the delivery of similar land uses coming forward. Accordingly only tables 2a and 2e have been assessed. Tables 2b, 2c, 2d and 2f do not represent B class employment land and has not been included in this assessment.
- 2.3 Each of the relevant tables is looked at below and comments are made on the individual sites where there are differences of opinion of the type or amount of development that can be delivered from the site. Those sites where a different opinion has been reached are shaded. Where there is agreement on the site, no comments are made.

Table 2a: Employment land gain within Class B Use Classes (Completions 1st April 2016 to 31 March 2017)

Parish	Site Address	Development Description	Use Class	Area ha.	HPP Comment	Actual supply ha.
Alkington	Agricultural Building at Damery Lane, Wootton Under Edge	Change of use under class M of agricultural building to business	B8	0.01	No record of this application	0.01
Alkington	Agricultural Building at Crendon Farm, Lower Wick, Dursley	Change of use of agricultural building to storage and distribution	B8	0.03	S.15/0226/P3M Change of use of agricultural building to storage and distribution (B8).	0.03
Eastington	Westend Courtyard Grove Lane, Westend	Proposed extension to Westend Courtyard to provide 10 additional offices (B1)	B1	0.59	-	0.59
Hamfallow	Billow Farm, Breadstone	Change of use from agricultural to storage (B8)	B8	0.03	Prior approval change of use from agricultural to storage (B8) S.16/1437/P3R. Application form states that the proposal is required for 'general non-agricultural storage'	0.03
Hardwicke	Gateway, 12 Davy Way, Hardwicke	Development of two detached units (use classes B1(c) B2 and B8)	B1-B8	2.19	S.15/1479/FUL Development of two detached units (Use Class B8) comprising 40,925 sq and 40,480 sq ft.. Application shows site area as 2.3ha.	2.30
Nympsfield	Land at Tinkley Corner, Nympsfield	Change of use from agriculture to wood processing yard and erection of buildings	B2	0.31	S.16/2286/FUL Change of use from agriculture to wood processing yard and erection of buildings. Application form highlights that the use began in March 2010 and therefore not considered employment land gain in the last year (and should be in table 2e instead). However, this is included as it contributes towards the overall completions.	0.31
Painswick	Barns associated with Knapp House, The Vatch, Catswood Lane	Conversion of redundant barn and piggery to micro-distillery	B2	0.21	S.17/1300/FUL Conversion of barns and ancillary building into single residential unit. The above application shows the redundant barn and piggery as being converted to ancillary accommodation for the main dwelling. No longer being used as a micro-distillery, thus employment gain.	0.00
Slimbridge	Wisloe Road Business Park, Wisloe Road, Cambridge	Erection of 5 industrial units (B2-General Industrial Use)	B2	0.38	S.15/0849/OUT	0.38
Stroud	West View, Paganhill Lane	Proposed change of use from C3a (dwelling) to B1 (business)	B1	0.04	S.16/1812/COU	0.04
Total				3.79		3.69

2.4 Table 2a of the 2017 ELA does not provide an accurate picture of the employment land gained during 1 April 2016 to 31 March 2017, and some of the sites should be removed/amended as above. The claimed 3.79 ha of employment land gain within Class B Use Classes has been reduced to 3.69ha.

Table 2e: Employment land gain with Class B Use Class (completions October 2006 to March 2017)

Parish	Site Address	Development Description	Use Class	Area ha.	HPP Comment	Actual supply ha.
Alderley	Alderley Trout Farm	Change of use of fish processing building to office, product development and stores (B1 Use)	B1	0.16	Ancillary element to the primary fishing business. Officers review acknowledges that this is an established employment site. Not new employment land.	0.00
Alderley	Grindstone Mill	Change of use of store	B1c	0.05	Ancillary element to main residential use	0.00
Alkington	Sunnyways, Woodford Berkeley	Erection of a live/work unit	B1a	0.13	Live/work is a Sui Generis Use Class (acknowledged by council in respect of other live/work units – table 2b)	0.00
Alkington	Pickwick Farm, Berkeley Heath	Change of use of agricultural building to small business workshop for renovation of touring caravans	B1	0.01	S.13/2654/P3M	0.01
Alkington	Land at Chapel Hill Newport		B2	0.33	Officer review of this application details the site as 0.084ha	0.084
Alkington	Barn at Goldwick Farm, Wick		B1c	0.03	S.08/1821/FUL - Change of use of buildings to form Studio Workshop (B1c) and associated live unit. Officer notes identify that the application comprises a live/work unit which is sui generis use.	0.00
Arlingham	The Mill House, Westend Farm, Church Road, Arlingham	Change of Use of agricultural building to office with storage.	B1	0.01	S.13/1813/P3M	0.01
Berkeley	Land at Lorridge Farm, Berkeley Heath	Change of use of building and part farm yard to B8	B8	0.45	Application S.08/2122/COU relates to change of use of agricultural building to offices, with associated parking. This site provides only 0.25ha of new employment	0.25
Bisley-with-Lypiatt	Oakridge Farm, Oakridge	Change of use of 2 agricultural buildings to office and joiners workshop. Conversion of stable building to Farrier's Forge.	B1/B2	0.01	Has been updated since the last ELA to reflect the application site area.	0.01
Cam	Upper Upthorpe Farm, Upthorpe	Conversion of former dairy to provide kitchen and service accommodation for catering business	B1c	0.09	The planning application related to this development (S.11/1889/FUL) shows a site area of 0.01ha only	0.01
Cam	Pear orchard Farm, Upthorne Lane, Cam	Change of use of barn to storage (B8) and associated access	B8	0.38	Application proposal shows 0.4ha (S.10/1858/COU)	0.4
Cam	Upthorpe Iron Works, Upthorpe Lane		B8	0.5	S.09/0855/FUL Retrospective application for the erection of a storage barn. Officer's review of this application shows the site already in employment use – "This site has been used for industrial purposes for over 100 years as the site was owned and named by the Lacey brothers, circa C19."	0.00
Cam	Opposite 8 Chapel Street, Cam	Erection of Parish Council Offices and Cafe. S.11/1148/FUL	A3/B1a	0.16	S.11/1148/FUL. Erection of Parish Council Offices and Cafe. Has been updated since the last ELA.	0.16
Dursley	Buildings at Mill Farm Uley Road		B8	0.34	Change of use of 2 agricultural buildings to B8 (Storage). (Revised scheme following permission S.05/0075) (Revised plan submitted 20.03.2006) Application form shows an area of 0.375	0.375

Parish	Site Address	Development Description	Use Class	Area ha.	HPP Comment	Actual supply ha.
Eastington	KB Coaches, Hillview Garage, Claypits, Eastington	Change of use of agricultural land to the rear of depot and garage to parking and storage of vehicles	B8	0.09	The officer review of this application (S.15/1491/COU) sets out that the proposal does not comprise any built form and simply provides an extension to an existing parking area. The proposal does not therefore represent an employment land gain and simply provides and extension to an existing car park.	0.00
Eastington	Westend Barns, Westend	Change of use of barns to B1 office and light industrial use.	B1a/c	0.33	-	0.33
Eastington	Westend Barns, Westend	Conversion of outbuilding to office use	B1a	0.12	-	0.12
Frampton on Severn	Netherhills Transport Depot, Perry Way	Erection of Portacabin site office and provision of associated parking	B1a	0.4	Does not constitute new employment land. The officers review states, "The development is proposed within an existing well established depot..."	0.00
Frampton on Severn	Walk Farm, Whitminster Lane	Change of use of farm building to office accommodation	B1a	0.2	-	0.2
Frampton on Severn	Walk Farm, Whitminster Lane	Change of use of agricultural barn to B8 storage	B8	0.13	Application S.11/1596/COU shows a site area of 0.03 only.	0.03
Ham and Stone	Unit 4, The Laurels, Stone, Berkeley	Change of use to a catering kitchen to provide food for outside functions	B1	0.01	The office review on this application (S.14/2924/COU) sets out that the application seeks the conversion of a garage to A1 use. The consideration given in the report is the appropriateness of the loss of an existing commercial use to a kitchen. The proposal does not therefore represent a gain in B Class employment.	0.00
Ham and Stone	Woodlands Farm, Clapton, Berkeley	Retention of storage unit and toilet unit	B8	0.03	-	0.03
Ham and Stone	Porch House, Stone	Change of use of part of the building from residential to a business/office	B1a	0.14	Application S.17/1135/COU approved to change part of house back to residential after previous office use. No longer in office use.	0.00
Hardwicke	Land at Elm Farm, Bristol Road	Change of use of land to form extension to existing B8 storage facility	B8	0.06	-	0.06
Hardwicke	Quadrant Distribution Centre, Bristol Road		B8	2.64	-	2.64
Hardwicke	Former Milking Parlour, Pound Lane	Change of use of former milking parlour to fencing contractors business.	B2	0.66	-	0.66
Horsley	Gate Willow Livery Yard, Horsley	Change of use of barn and adjoining building to live/work unit including treatment plant and photovoltaic panels	B1	1.35	Sui Generis use and not B class employment. This calculation has also included the land for photovoltaic panels which is not considered to be an employment use.	0.00
Horsley	The Gables Farm, Tittups End, Horsley	Development of a purpose-built smokehouse and processing facility for the use of Ruskin Mill College to provide an educational, training and workshop	B1c	0.27	Application form shows different area. (S.11/1971/FUL)	0.1779
Kingswood	Renishaw, New Mills, Wotton Road, Kingswood	Erection of building for research and development, associated parking and landscape	B1a/B1b	4.91	-	4.91

Parish	Site Address	Development Description	Use Class	Area ha.	HPP Comment	Actual supply ha.
Kingswood	Land adjoining Charfield Road	Erection of an industrial building for B1/B8 use.	B1c	0.15	-	0.15
Moreton Valence	Unit 2 Old Airfield, Moreton Valence		B8	0.24	-	0.24
Moreton Valence	Carillion Site office, Old Airfield Farm		B1a	0.4	Resubmission of refused application S.09/0969/FUL (retrospective application for retention of office building)	0.4
Painswick	Meister Masonry Ltd, Painswick	Erection of storage building	B8	0.14	-	0.14
Painswick	Packhurst Farm, Edge		B8	0.03	Change of use from barn to document & record storage (S.06/2155/COU)	0.03
Slimbridge	Land Parcel, Wisloe Road, Cambridge, Dursley	Outline permission for the erection of 4 industrial units	B2	0.1	The officer review of this application (S.14/0587/OUT) highlights that the proposed development is on an existing employment site. This application does not therefore represent employment land gain for B Class uses.	0.00
Standish	Horsemarling Farm, Standish		B8	0.3	Since the site was in B8 use, permission has been granted (S.13/1387/FUL) the redevelopment of the site for residential use. Developer on board and conditions have been discharged. Site no longer in employment use.	0.00
Standish	Standish Moreton Farm, Standish Lane		B1	0.23	Application S.08/0517/FUL for the Conversion of existing barn and outbuildings into new residential dwelling and commercial unit. Commercial use only comprises a small proportion of the site (126m2) and therefore site area should be reduced to 0.0126ha.	0.0126
Stinchcombe	5 The Buildings, The Street, Stinchcombe	Retrospective application for the erection of two garden room buildings and use as office space for small business	B1a	0.01	Application form highlights the site area as 25sqm (0.0025ha)	0.0025
Stonehouse	Stonehouse Park, Sperry Way, Stonehouse	Hybrid permission for the construction of B1, B2, and B8 uses.	B1a, B2, B8	1.54	This site is an existing employment site with a long planning history dating back to 1998 (S.98/1415). Therefore the proposal does not represent new employment land.	0.00
Stonehouse	Land lying to the south of Albion Terrace, Stonehouse	Erection of office building	B1a	0.03	The entire site is already in commercial use (officer's review) and accordingly this development does not constitute employment land gain.	0.00
Stonehouse	Messrs Stonehouse Paper & Bag Mills Ltd, Lower Mill Bridgend	COU of land from agricultural to re-siting of storage containers	B8	0.01		0.01
Stonehouse	Units 100 and 200 Stonehouse Park, Bristol Road		B1a	0.61	-	0.61
Stonehouse	Land adjacent Bonds Mill (Plot B), Stonehouse Business Park		B1a	0.64	-	0.64
Stonehouse	Plot C (units 600 and 700), Stonehouse Park, Sperry Way		B1a	0.45	-	0.45
Stonehouse	Land at Stroudwater Business Park, Brunel Way		B1	1.9	-	1.9

Parish	Site Address	Development Description	Use Class	Area ha.	HPP Comment	Actual supply ha.
Stroud	8 London Road, Stroud	Change of use from residential to a non-financial business premises	B1a	0.01	Application form highlights the site area as 35sqm (0.0035ha)	0.0035
Whiteshill and Ruscombe	Hill Farm, Main Road, Whiteshill, Stroud	Conversion and part redevelopment of two existing out buildings into a live/work family home	B1	0.23	The change of use does not create employment land and falls under sui generis use class.	0.00
Totals				21.01		15.06

2.5 The Council's assessment in Table 2e has not been accurate in establishing employment land gains. Some of the land that has been included falls into other use classes and accordingly has been removed from the land supply. The claimed supply of 21.01ha is therefore reduced to 15.06ha

TOTAL COMPLETIONS

2.6 Overall, it is considered that the Council's figure for completions of 24.8ha should be reduced to 18.75ha.

3.0 Assessment of Commitments

- 3.1 The 2017 ELA provides a detailed list of land that is committed for employment purposes between 2006 and 2017.
- 3.2 Table 3a and 3b includes commitments for non B class uses and therefore all sites proposed for non B-class uses have been discounted.
- 3.3 Table 3a and 3b are assessed below and comments are made on the individual sites where there are differences of opinion of the type or amount of development that can be delivered from the site. Those sites that are not proposed for B class uses, or where a different opinion has been reached, are shaded. Where there is agreement on the site, no comments are made.

Table 3a: Commitments on non-allocated sites at 1 April 2016

Parish	Site Address	Development Description	Use Class	Floor Area (m ²)	Area (Ha)	HPP Comment	Actual supply ha.
Alkington	Land at Actrees Farm, Heathfield, Alkington	Provision of spare parts container	SG	30	0.003	Sui Generis use class	0.00
Alkington	Kitt Green Nursery, Heathfield, Alkington	Change of use from residential store outbuilding to garden centre tearoom with alterations	SG	81	0.008	Sui Generis use class	0.00
Alkington	Actrees Farm, Heathfield, Alkington	Change of use of agricultural building to mixed B2/B8 use with ancillary office space	B2 B8	1326	0.14		0.14
Alkington	Land adjacent to Chapel Hill, Newport, Berkeley	Outline application for 3 industrial units	B8	449	0.46	Application form highlights the site area as 0.39ha	0.39
Cainscross	1 Kingley Villas, Cashes, Green Road, Stroud	Extension of dance studio and change of use of residential land to D2 use.	D2	119	0.02	D2 use class	0.00
Cam	Barns at Woodend Lane Cam	Change of use of two agricultural buildings to an office use (class B1)	B1	480	0.11	-	0.11
Coaley	Cambridge House Farm, Dursley Glos	Demolition of the existing poultry sheds. Erection of an office block.	B1a	659	0.95	Office area only equates to 0.0659ha.	0.0659
Dursley	Farm buildings at Chestal Farm, Drake Lane, Cam	Conversion of existing farm building to form 1 dwelling and 1 office with store.	B1	205	0.1	Only 205sqm is proposed as offices, the rest of the site is residential. As such, the site area should be adjusted.	0.02
Eastington	John Stayte Services Ltd, Puddlesworth Lane Eastington.	Erection of building on existing site and change complete site to B2 vehicle servicing and repair including MOT testing and Sui generis car sales use.	B2	166	0.1	-	0.1
Hardwick	Coletthrop Farm, Haresfield, Stonehouse	Change of use of the buildings to the storage of caravans on a temporary basis	B8	0	0.5	Site within the boundary of the Hunts Grove allocation/ application. However, outside employment land identified and therefore additional	0.5
Hardwick	Units 4, 5 and 6 Gateway, 12 Davy Way	Development of three detached Units	B8	12790	3.69	-	3.69

Parish	Site Address	Development Description	Use Class	Floor Area (m ²)	Area (Ha)	HPP Comment	Actual supply ha.
Hardwick	Coletthrop Farm (Hunts Grove – LP Allocation)	Outline app for 105ha for 1750 Dwellings neighbourhood centre (including primary school Parking floorspace within use classes A1 A2 A3 A4 A5 C2 C3 D1 D2 and B1) 5.75ha employment dev within use classes B1 B2 and B8 rec open space	B1 B2 B8	0	0.69	Applications at ‘Gateway 12’ fall within the site covered by the wider application. Gateway 12 is located within the area defined as ‘employment development’ on the site plan for the approved outline scheme. Gateway 12 sites are considered elsewhere in the Council’s ELA, and completions and commitments total 5.99ha, exceeding the amount of employment land identified by the outline consent. It is not clear therefore what additional land is.	0.00
Hinton	Daunceys Farm Purton, Berkeley Glos.	Replacement of existing barn with a new building to accommodate the relocation of the existing Class D1 chiropractic practice and private medical practice at the adjacent Timber Pond House.	D1, D2	620	0.9	Not B Class employment	0.00
Horsley	Hay Lane Farm Hay, Lane Horsley	Change use of storage/ livestock building from agricultural to flexible commercial (B8) use	B8	475	0.05	-	0.05
Leonard Stanley	Former Saxon Church to West of Priory House, Church Road, Leonard Stanley	Change of use of former saxon chapel to function buildings (wedding funeral wakes and private parties) and change of use of agricultural land to ancillary car park.	D	85	0.2	Not B Class employment	0.00
Longney	Land Adjacent To Scotch Firs House Longney Gloucester.	Notification of change of use of building A and Building B from agricultural to office use	B1	131	0.29		0.29
Minchinhampton	Grain crushing barn, Gatcombe Park Estate	Change of use (permitted development) from currently agricultural barn to class B1 (meeting space)	B1	156	0.01	Application S.16/0955/P3R explains that the proposals is for ancillary meeting space associated with the events held on site (horse trials, cycling, concerts). Considered use of the site is D2 (which is also considered to be the case by GCC in the highways response).	0.00
Minchinhampton	Land at Gypsy Lane, Chalford	External alterations and enlargement of curtilage to lawful Class B8 premises.	B8	1013	0.1	-	0.1
Minchinhampton	Land At Gypsy Lane, Chalford.	Change of use of Agricultural Building to a Class B8 use	B8	180	0.14	-	0.14
Miserden	Barns at Camp Farm, Calf Way The Camp	Conversion of Barns to B1 use	B1	229	0.02	-	0.02
Nailsworth	Forge Cottage Bath Road	Change of use of garden building to office use and extension	B1a	35	0.15	-	0.15
Painswick	Hammonds Farm Wick Street	Change of use of existing farmhouse (C3) to an 8 bed guest house (C1)	C1	160	0.02	Not B Class employment	0.00
Rodborough	Farm Building Butterrow, Lane Stroud.	Change of use of agricultural building to B1 office.	B1	81	0.01	-	0.01

Parish	Site Address	Development Description	Use Class	Floor Area (m ²)	Area (Ha)	HPP Comment	Actual supply ha.
Stonehouse	Lyndian Oldends Lane Stonehouse.	Demolition of existing dwelling house erection of new buildings and change of use to C2 to provide a care facility.	C2	525	0.1	Not B Class employment	0.00
Stonehouse	Land to south of Albion Terrace Downton Road Stonehouse Glos.	Erection of 6 light industrial units.	B1c	179	0.11	-	0.11
Stonehouse	Land Adjacent To Stonehouse Commercial Centre	Erection of 5 Buildings (B1 B2 & B8)	B1, B2 and B8	532	0.3	-	0.3
Stonehouse	Land Adjacent To Oldends Lane Stonehouse.	Construction of a two storey B1 B2 B8 production unit	B1, B2 and B8	8077	1.85	-	1.85
Stonehouse	Land Adjacent To Schlumberger (Building F) Brunel Way Stonehouse Glos.	Construction of a two storey B1 office unit.	B1	1324	4.74	S.14/1978/FUL application site boundary identifies the site area as 0.46ha	0.46
Totals:			All Uses	15.76			
			B Class	14.51			8.496

3.4 The Council's assessment in Table 3a has not been accurate in establishing commitments in the District. Some of the land that has been included falls into other use classes and accordingly has been removed from the land supply. The claimed supply of 15.76 is therefore reduced to 8.496ha.

Table 3b: Commitments on allocated sites as at 1st April 2017

Parish	Site Address	Development Description	Use Class	Floor Area (m ²)	Area (Ha)	HPP Comment	Actual supply ha.
Cam	Land north east of Draycott, Cam	A mixed use development comprising of up to 450 dwellings, 10.7 hectares of employment land for use classes B1, B2 and B8.	B uses		10.70		
Eastington	Land west of Stonehouse, Nastend Lane	A mixed use development comprising up to 1350 dwellings and 9.3 hectares of employment land for use classes B1, B2 and B8.	B1 B2 B8		9.3		
Hinton	Howard Tenens (Sharpness) Ltd, Sharpness Distribution Centre	Erection of 2 no. buildings for light industrial/storage and distribution purposes (use class B1 and B8)	B1, B8	46400	9.80		
Totals:				29.8			29.8

TOTAL COMMITMENTS

3.5 Overall, it is considered that the Council's figure for commitments for B class uses of 44.31 should be reduced to 38.3ha.

4.0 Assessment of Losses

4.1 Employment losses are considered on a like for like basis and are assessed looking at B Class losses only.

Table 4a: Actual loss of employment land 1st April 2016 to 31st March 2017

Parish	Site Address	New development description	Former use	Area Ha	HPP Comment	Actual land loss
Alkington	Taylor's of Woodford Ltd Woodford Berkeley	Demolition of existing garage and erection of six dwelling	B2	0.34	-	0.34
Arlingham	Arlingham Free Church Friday Street Arlingham	Convert listed chapel into dwelling and single storey extension.	D1	0.08	Not employment use	0.00
Berkeley	12 Market Place Berkeley	Change of use of first floor offices to a residential flat	B1	0.005	-	0.005
Cam	Ambulance Station Marment Road Cam	Conversion and extension of old ambulance station to create 3 dwellings	SG	0.06	Not employment use	0.00
Dursley	13 Woodland Avenue Dursley	Change of use from residential institution (C2) to dwelling (C3).	C2	0.06	Not employment use	0.00
Dursley	25 Uley Road Dursley	Change of use of basement from commercial (A1) to residential (C3).	A1	0.01	Not employment use	0.00
Frampton on Severn	Perryway Garage Perry Way Frampton On Severn	Change of use from auto repair to residential and construction of 4 dwellings	SG	0.11	Not employment use	0.00
Hardwicke	Cross Keys House Bristol Road Hardwicke	Demolition of former public house building currently used as an office.	B1	0.18		0.18
Hinton	Miles Garage Gloucester Road Newtown	Demolition of existing buildings and erection of two detached four bed houses.	SG	0.1	Not employment use	0.00
Kings Stanley	Central Garage High Street Kings Stanley	Demolition of redundant vehicle repair and storage building.	B2	0.02	-	0.02
Kings Stanley	Kings Stanley Butchers, High Street Kings Stanley	Change of use to form a one bed residential unit.	A1	0.01	Not employment use	0.00
Kings Stanley	Kings Stanley Church Of England Primary School Church Street	Change of use to form three new dwellings with detached garaging.	D1	0.1	Not employment use	0.00
Minchinhampton	52 West End Minchinhampton	Retrospective change of use application to return the whole property to a domestic dwelling.	A1	0.01	Not employment use	0.00
Nailsworth	Crown Inn Valley Road Inchbrook	Conversion of former pub into two dwellings and the erection of five new dwellings	A4	0.21	Not employment use	0.00
Painswick	Meadow Bank, Kings Mill Lane	Change of use from mental health residential care home (C2) to dwelling (C3).	C2	0.2	Not employment use	0.00
Rodborough	Bownham Park School Bownham Mead Rodborough Common	Redevelopment of former school site for housing.	D1	3.45	Not employment use	0.00

Parish	Site Address	New development description	Former use	Area Ha	HPP Comment	Actual land loss
Stonehouse	Stonehouse Youth Centre Elm Road Stonehouse	Demolition of existing building and erection of 8 dwellings	D2	0.12	Not employment use	0.00
Stonehouse	The Ryeford Arms 12 Ebley Road Stonehouse	Change of use of buildings from C2 (residential institution) to 3x C3b private dwellings (with care provided).	C2	0.39	Not employment use	0.00
Woodchester	Woodchester Garage Bath Road	Conversion to create 8 flats and erection of a single storey rear extension.	SG	0.15	Not employment use	0.00
Wootton Under Edge	The Clubhouse Canons Court Golf Club Bradley Green	Change of use of existing clubhouse and immediately adjoining land to a dwelling.	D2	0.19	Not employment use	0.00
Wootton Under Edge	10 High Street Wotton-Under-Edge	Change of use from financial and professional (A2) to residential (C3).	A2	0.01	Not employment use	0.00
Totals			All uses	5.805		
			B Class	0.545		0.545

Table 4b: Actual loss of employment land October 2006 to 31st March 2016

Parish	Site Address	New development description	Former use	Area Ha	HPP Comment	Actual land loss
Alderley	Rose Hill School, Alderley	Residential	D1	3.75	Not employment use	0.00
Berkeley	12 Market Place, Berkeley	Residential	B1a	0.31	-	0.31
Berkeley	Police Station, Canonbury Street	Residential	SG	0.07	Not employment use	0.00
Berkeley	Building opposite 4 Station Road	Demolition	B8	0.01	-	0.01
Bisley	Bathurst House, Bisley Road	Residential	B1a	0.1	-	0.1
Bisley – with-Lypiatt	Methodist Chapel, Oakridge Lynch	Residential	D1	0.07		0.07
Bisley – with-Lypiatt	Middle Lypiatt House	Residential	B1a/B1c	0.27	-	0.27
Bisley – with-Lypiatt	Methodist Church	Residential	D2	0.07	Not employment use	0.00
Cainscross	37 Westward Road	Residential	B2	0.03	-	0.03
Cainscross	265 Westward Road	Residential	A1	0.03	Not employment use	0.00
Cainscross	Gardeners Rest, Cashes Green	Residential	A4	0.14	Not employment use	0.00
Cainscross	284 Westward Road	Residential	A5	0.01	Not employment use	0.00
Cam	St Bartholomews Church Hall	Residential	D1	0.04	Not employment use	0.00
Cam	20 Rock Road	Residential	B1c	0.09	-	0.09
Cam	25-27 High Street	Residential	A1	0.03	Not employment use	0.00
Cam	18 Draycott	Residential	A1	0.01	Not employment use	0.00
Chalford	Bew House, Bussage	Residential	B1a	0.03	-	0.03
Chalford	Police Station, Bussage	Residential	SG	0.3	Not employment use	0.00
Chalford	The Post House, Chalford	Residential	A1	0.01	Not employment use	0.00
Dursley	54 Silver Street	Residential	SG	0.01	Not employment use	0.00
Dursley	Wistaria House, 13 May Lane	Residential	A2	0.02	Not employment use	0.00

Parish	Site Address	New development description	Former use	Area Ha	HPP Comment	Actual land loss
Dursley	Lister Petter Works	Redevelopment for mixed use	B2	5.13	-	5.13
Dursley	33 Silver Street	Residential	A1	0.01	Not employment use	0.00
Dursley	Land at Whiteway Hill Garage	Residential	SG	0.05	Not employment use	0.00
Dursley	The Royal British Legion, 4 May Lane	Residential	B8	0.11	-	0.11
Dursley	Lister Petter Works, Long Street, Dursley	Mixed use	B2	14.72	-	14.72
Dursley	Plots 8 & 9 Manor View	Residential	B1a	0.04	-	0.04
Frampton on Severn	Top Shop House, The Green, Frampton	Residential	A1	0.01	Not employment use	0.00
Ham and Stone	Berkeley Vale Hotel, Stone	Mixed use	C1	0.08	Not employment use	0.00
Ham and Stone	Pines Courtyard	Car Park	SG	0.17	Not employment use	0.00
Hamfallow	Ivy Farm, Breadstone	Residential	B1	0.13	-	0.13
Hillesley and Tresham	Former Dairy, Chapel Lane, Hillesley	Residential	B2	0.05	-	0.05
Hinton	1 Gloucester Road	Residential	A1	0.03	Not employment use	0.00
Kings Stanley	The Stores, The Green	Residential	A1	0.06	Not employment use	0.00
Miserden	Office at Camp Farm	Residential	B1	0.25	-	0.25
Nailsworth	Hazelwood's Food factory site	Residential	B2	0.7	-	0.7
Nailsworth	3 Bridge Street	Residential	B1a	0.01	-	0.01
Painswick	Painswick Library	Residential	D2	0.04	Not employment use	0.00
Painswick	Little Fleece, Bisley Street	Holiday Cottage	A1	0.04	Not employment use	0.00
Randwick	Waterlane Farm, Paganhill	Residential	B2/B8	0.11	-	0.11
Rodborough	Part Redlers Mill, Dudbridge Road	Residential	B2	0.85	-	0.85
Slimbridge	White Lion PH, Bristol Road, Cambridge	Residential	A4	0.16	Not employment use	0.00
Stonehouse	Spa Inn, Oldends Lane	Residential	A4	0.19	Not employment use	0.00
Stonehouse	Elgin Mall, High Street, Stonehouse	Residential	B1a	0.02	-	0.02
Stonehouse	34 High Street	Residential	B1	0.4	-	0.4
Stroud	Timms Garage, Cainscross Road	'Later Living' apartments including communal facilities	B2	0.31	-	0.31
Stroud	60-62 Horns Road	Residential	Mixed	0.009	Not employment use	0.00
Stroud	K Young & Sons Ltd, Gainey's Well, Upper Leazes, Stroud	Residential	B2	0.3	-	0.3
Stroud	Stafford Coffee Shop, Stafford Mill	Residential	A1	0.01	Not employment use	0.00
Stroud	48 Lansdown, Stroud	Residential	D1	0.02	Not employment use	0.00
Stroud	86-90 Cainscross Road, Stroud	Residential	A1	0.02	Not employment use	0.00
Stroud	Whittington House	Residential	C2	0.06	Not employment use	0.00
Stroud	Delmonts Lot, 57a High Street	Residential	B1	0.04	-	0.04
Stroud	Slad Valley House, 203 Slad Road	Residential	B1	0.4	-	0.4
Stroud	3-4 Lansdown	Residential	A2	0.01	Not employment use	0.00
Stroud	Acre Street Rooms	Residential	D2	0.08	Not employment use	0.00

Parish	Site Address	New development description	Former use	Area Ha	HPP Comment	Actual land loss
Uley	Former Stables, 7 The Green, Uley	Residential	B1a	0.01	-	0.01
Whiteshill and Ruscombe	Woodcutters Arms, Whiteshill	Residential	A4	0.08	Not employment use	0.00
Whitminster	The Old Courthouse, School Lane, Whitminster	Residential	A1	0.06	Not employment use	0.00
Woodchester	The Old Post office	Residential	A1	0.08	Not employment use	0.00
Wotton Under Edge	15 Market Street	Residential	A2	0.02	Not employment use	0.00
Wotton Under Edge	Former Professionals Shop, Canons Court Golf Club	Residential	A1	0.06	Not employment use	0.00
Wotton Under Edge	Manners Farm, Wortley Road	Residential	A1	0.08	Not employment use	0.00
Wotton Under Edge	Land at Mitre Pitch	Residential	B1c	0.36	-	0.36
Wotton Under Edge	Carlton House	Residential	B1	0.06	-	0.06
Wotton Under Edge	Land off Pack Horse Lane	Residential	B2	0.25	-	0.25
Wotton Under Edge	Land adjoining Water Lane	Residential	B1c	0.21	-	0.21
Wotton Under Edge	The Court, Culverhay	Residential	C2	0.37	Not employment use	0.00
Wotton Under Edge	Youth Club, Rope Walk	Residential	D1	0.04	Not employment use	0.00
Totals			All uses	31.70		
			B Class	25.3		25.3

Table 4d: Potential Loss of employment land at 1st April 2017 (non-allocated sites)

Parish	Site Address	New development description	Former use	Area Ha	HPP Comment	Actual land loss
Alkington	Newport Towers, Newport	Mixed Use Development including residential and shops	C1	1.4	Not employment use	0.00
Berkeley	Berkeley Hospital	Conversion of former hospital building to residential	C2	0.36	Not employment use	0.00
Cainscross	175 & 177 Westward Road	Alterations, sub-division and change of use of existing building to 6 dwellings	B1	0.07	-	0.07
Cainscross	Tricorn House	Notification for prior approval for a proposed change of use of existing office building into 44 residential units.	B1	0.36	-	0.36
Cam	Summerhayes General Stores	Demolition of stores and erection of five dwellings	A1	0.11	Not employment use	0.00
Cam	16A Chapel Street	Erection of dwelling formation of access and demolition of existing shop	A1	0.04	Not employment use	0.00
Dursley	The Electric Garage, Prospect Place	Demolition of existing industrial building. Erection of 2 no. two-bedroom flats and associated works	SG	0.01	Application form describes the site as previously B2 use.	0.01

Parish	Site Address	New development description	Former use	Area Ha	HPP Comment	Actual land loss
Dursley	54 Long Street	Change of use of the ground floor area and rear extension from D1 to 2 residential units	D1	0.04	Not employment use	0.00
Dursley	18 Woodmancote Dursley	Demolition of existing buildings and erection of ten dwellings.	SG	0.19	Not employment use	0.00
Dursley	Dursley Garage, 29-31 Kingshill Road	Demolition of existing showroom and offices. Erection of 8x2 bedroom townhouses and 2x2 bedroom flats, creation of two office spaces	SG	0.06	Not employment use	0.00
Ham and Stone	Outbuildings at the Laurels, Stone	Change of use of building from offices to residential use	B1/B8	0.05	-	0.05
Hardwicke	Purton Cottage, Bristol Road	The erection of 4 dwellings, 1 live/work unit	B1	0.37	-	0.37
Horsley	The Coach House, The Street	Change of use from Coach Hire Business to 4x Residential units	SG	0.08	Not employment use	0.00
Kings Stanley	Stanley Mills, Ryeford	Provision of a new factory, conversion of mill to 65 dwellings and 81 new build dwellings	B2	1.49	-	1.49
Minchinhampton	Dark Mills, Knapp Lane, Brimscombe	Approval of reserved matters for the erection of 36 houses and flats for people over 50 years of age.	B2	1.4	-	1.4
Minchinhampton	Cooper, Brimscombe Hill, Burleigh	Removal of Stone building change of use of builders yard to residential	SG	0.14	Not employment use	0.00
Minchinhampton	The Trumpet, 37-39 West End	Change of use to make the whole of the property domestic	A1	0.03	Not employment use	0.00
Nailsworth	21 Market Street	Demolition of existing building. Construction of 3x Live/Work units	A1	0.01	Not employment use	0.00
Painswick	Fiery Beacon, New Street	Change of use from mixed retail/residential to residential	A1	0.01	Not employment use	0.00
Painswick	Fire Station, Pullens Road	Conversion of former fire station into two dwellinghouses	SG	0.08	Not employment use	0.00
Randwick	AS Cooke & Co, Acre Place, Paganhill	Redevelopment of former building yard for two dwellings	SG	0.13	Not employment use	0.00
Rodborough	Land at Spillmans Road, Stroud	Demolition of existing garage	SG	0.13	Not employment use	0.00
Stonehouse	Land at Station Road, Bristol Road	Proposed residential development for up to 49 units	SG	1.51	Not employment use	0.00
Stonehouse	Old Station Yard, Bristol Road	Demolition of existing warehouse building and the erection of 15 residential dwellings	B8	0.31	-	0.31
Stroud	Thompson First Ltd, Butterow Hill, Bowbridge	Approval of reserved matters for the erection of 24 dwellings	B1	0.49	-	0.49

Parish	Site Address	New development description	Former use	Area Ha	HPP Comment	Actual land loss
Stroud	Uplands Garage, Springfield Road	Erection of a single dwelling	B2	0.01	-	0.01
Stroud	Barn 3 Lypiatt Hill Farm	Change of use of barn from work unit into residential use	B1	0.08	-	0.08
Stroud	The Hut Folly Lane Stroud	Demolition of former scouts hut and erection of 2 new dwellings	D2	0.05	Not employment use	0.00
Stroud	118 Cainscross Road	Change of use from B1 back to residential use	B1	0.07	-	0.07
Thrupp	STB Engineering, Toadsmoor Road	Demolition of existing buildings and erection of 11 dwellings and an office block	B2	0.34	-	0.34
Thrupp	Lewiston Mill, Toadsmoor Road, Brimscombe	Demolition and conversion of existing building to create a mixed commercial/residential development including 20 apartments and 10 townhouses.	B1	0.46	-	0.46
Whiteshill and Ruscombe	The Healthy House, Lower Street	Proposed change of use of existing building from offices to 3 cottages	B1	0.03	-	0.03
Woodchester	The Woodchester Piano co., Woodchester Mill, North Woodchester	Retention of former piano factory for B1 use, demolition of redundant industrial buildings. Erection of 6 no. dwellings and conversion of stone building to 4 dwellings.	B2	0.26	-	0.26
Wotton-under-Edge	14 Synwell Lane	Outline application for residential development	B1	0.14	-	0.14
Wotton-under-Edge	22 Bradley Street	Change of use of offices and workshop to form 4 dwellings car port with associated parking and amenity areas.	B1	0.01	-	0.01
Wotton-under-Edge	11 Haw street	Conversion of existing workshop into a two bedroom house	B2	0.01	-	0.01
Totals			All uses	10.34		
			B Class	5.95		5.96

Table 4e: Potential losses on allocated sites as at 1 April 2017 (allocated sites)

Parish	Site Address	New development description	Former use	Floor Area m2	Area Ha	HPP Comment	Actual land loss
Cainscross	Dudbridge (Avocet) Industrial Estate, Dudbridge	Demolition of existing buildings on site and erection of a new retail foodstore.	B1/B2	16461	3.25	-	3.25
Minchinhampton	Wimberley Mills, Knapp Lane	Demolition and clearance of the existing buildings and hard standing, residential development of up to 104 dwellings	B1a/B2	35189	4.50	Permitted via planning permission S.13/2668/OUT	4.50
Rodborough	Daniels Industrial Estate	Outline application for mixed use redevelopment comprising new foodstore, retail unit, up to 50 residential dwellings, vehicular access and parking.	B1 B2 B8	13066	2.9	S.16/2152/OUT Approved at committee in September 2017 subject to s106.	2.9

Parish	Site Address	New development description	Former use	Floor Area m2	Area Ha	HPP Comment	Actual land loss
Rodborough	Bath Road Trading Estate, Bath Road	The reconfiguration and refurbishment of existing industrial units (L4A-L4D) to provide 2,193sqm modern Class B2 industrial floorspace, together with the demolition of vacant existing buildings and the erection of a Class A1 discount food store (1,918sqm gross), with associated access, car parking and landscaping.	B1c	4892sqm	1.03	S.17/0557/FUL approved in September 2017. Overall the site area is 1.42 ha, of which 1.03 to be removed for the proposed Aldi A1 store.	1.03
Totals		(Excludes 2 additional)			7.75	(includes 2 additional)	11.68

4.2 HPP has added the Bath Road Industrial Estate and Daniels Industrial Estate as permission has recently been granted on these sites for non B class uses. This is not represented within the 2017 ELA and is not within the Council's figure.

TOTAL LOSSES

4.3 The total B class losses as set out from table 4a, 4b, 4d and 4e are as follows:

	Period	SDC Area (Ha)	SDC Total (Ha)	HPP Area (Ha)	HPP Total (Ha)
Actual Loss	2016-2017	0.545	25.85	0.545	25.85
	2006-2016	25.30		25.30	
Potential Loss	2006-2017	5.95	13.7	5.96	17.64
	2006-2016	7.75		11.68	

4.4 The Council's losses as set out in the summary table only include actual losses, and do not include potential losses. This approach means that potential losses have no effect on the employment land position until such time as the proposed redevelopment from B class into a different use actually occurs. However, it is considered that the potential losses also will affect employment land supply and therefore HPPs approach is to include those potential losses.

4.5 Overall, it is considered that the Council's figure for losses B class uses of 25.85ha should be increased to include the potential loss (17.64), therefore increasing total losses to 43.49ha.

5.0 Assessment of Local Plan Allocations

- 5.1 Table 5a of the 2017 ELA sets out Employment Allocations in the Local Plan (LP), and the Council's current position.
- 5.2 Core Policy CP2 of the LP sets out 4 strategic sites that in total will provide 52ha of new employment land for the District. These sites are broken down as follows:
- SA2 West of Stonehouse: 10ha
 - SA3 North East Cam: 11.4ha
 - SA4a Quedgeley East: 13ha
 - SA5 Sharpness Docks: 7ha
 - SA5a South of Severn Distribution Park: 9.8ha

SA2 WEST OF STONEHOUSE

- 5.3 Outline permission has now been granted for the proposed mixed use development (S.14/0810/OUT) which indicates 9.3ha of B Class employment. This application encompasses the whole site allocated within the local plan.
- 5.4 The Council has included the application within Table 3b (commitments), but highlights that the 'area remaining' is 0.7ha (table 5a).
- 5.5 Overall, this site is considered available and deliverable; however, it is considered that the site will only deliver 9.3ha of employment space in line with the application. As such, the remaining 0.7ha should be removed.

SA3 NORTH EAST CAM

- 5.6 The application benefits from a resolution to grant planning permission for 'mixed use development comprising of up to 450 dwellings, 10.7 hectares of employment land for Use Classes B1, B2 and B8 with associated parking and servicing; open space and landscaping including riverside park; flood storage ponds and infrastructure; creation of new vehicular accesses to Draycott (A4135) and Box Road and supporting infrastructure and utilities.' SDC resolved to permit the application at committee in November 2016, subject to the completion of a s106 agreement. This site encompasses the majority of the allocation (plus some additional land outside the allocation).
- 5.7 The Council has included the application within Table 3b (commitments), but highlights that the 'area remaining' is 0.7ha (table 5a). The application does not encompass the whole allocation, and there is some of the allocated land remaining; as such it is considered that the whole allocation is available and deliverable for employment land (11.4ha).

SA4A QUEDGELEY EAST

- 5.8 This site is located off Junction 12 of the M5 adjoining the existing Quedgeley East warehouse development currently operated by St. Modwen Developments.
- 5.9 St Modwen Developments has submitted an application on site (S.16/1724/OUT) for a business park comprising B1 (Business), B2 (General Industrial) and B8 (Storage or Distribution) including access arrangements and demolition of existing business park. The application site includes the whole allocated site, as well as the existing Quedgeley Business Park. As such, the new employment land will only be the allocated site.
- 5.10 In this context, it is considered that the entire site is considered available and deliverable (13ha).

SA5 SHARPNESS

- 5.11 The Planning Practice Guidance (PPG) states that '*Housing and economic development needs assessments*' highlights that plan makers should consider 'market intelligence from local data and discussion with developers and property agents, recent surveys of business needs or engagement with business and economic forums.'
- 5.12 Despite the site's allocation, it is considered that the site is unattractive (without significant investment) and therefore is unlikely to be delivered during the plan period.

- 5.13 The Stroud District Employment Land Study (2013), prepared during the preparation of the Stroud District Local Plan, highlights the following:

'Around a third of the 2012 supply (4 sites comprising 19.40 ha) is located at Sharpness Docks. Owned by the Canal and River Trust (formally British Waterways), this land comprises long term allocations of low quality brownfield/greenfield land. Several of the sites are inaccessible, located within the secure dock estate, while others are constrained by site conditions (trees on site, former dock infrastructure on site, possible contamination). Two are in active use for open storage.'

and

'Discussions with stakeholders suggest that, despite its relatively isolated position, there is demand for industrial and logistics premises at Sharpness. However, that demand is focused at Severn Distribution Park (which has unused expansion land) rather than at the dock itself. Stakeholders feel that if the four allocated sites are ever brought forward it is likely to be for port related infrastructure rather than traditional B1/B2/B8 employment.'

- 5.14 Recommendation 5 in the conclusions of the Employment Land Study set out the following for the employment provision at Sharpness:

Recommendation 5 – Continue to Assess Land at Sharpness Docks

Stroud District includes significant port facilities at Sharpness Docks. At present, there are four employment sites at the Docks, totalling 19.40 ha. This land comprises long term allocations of low quality brownfield/greenfield land. Several of the sites are inaccessible, others are constrained by site conditions and two are in active use for open storage.

14.26 It is the view of this study that these sites are unlikely to come forward for general B1/B2/B8 employment. However, it is not possible to predict what future land requirements the Docks themselves will have. An expanding Dock complex may, for example, have requirements for infrastructure, open storage or vehicle parking which could only be met on the allocated land. It is therefore recommended that the four sites be retained as infrastructure land to support Sharpness Docks. This does not preclude the possibility that some of this land could be used to support a future employment development proposal, should one emerge.

14.27 Demand for industrial and logistics premises at Sharpness is focused at the adjacent Severn Distribution Park and the Distribution Park owner has plans to expand this facility. Severn Distribution Park is now established as a key warehouse/distribution facility in Stroud District and the wider Gloucestershire sub-region. Realistic and viable proposals to deliver further warehouse accommodation at this location should therefore be supported." (our emphasis)

- 5.15 Site allocation SA5 is therefore assessed as being available for 7ha of dock expansion land. However, is clear that the site is subject to some constraints but would only deliver low quality premises and generally only suitable for dock related activities. Some of the land is also already in dock related use and therefore does not constitute new employment land.
- 5.16 Listening to market intelligence and having regard to the length of time that these sites have remained vacant, it is unlikely that these sites will come forward for B Class employment during the lifetime of the plan. This is considered to be a major constraint to the delivery of this site and it is considered that they would remain unattractive to employers looking for new land and premises.
- 5.17 It is acknowledged that there is an application on the site for *'mixed use development which includes up to 300 dwellings (C3), industrial and distribution development (B1c,B2,B8) on 6.6 hectares of land 2 no. marinas, up to 1250m² of ancillary retail / food and drink uses (A1,A2,A3 and A4) up to 7,000m² of commercial floor space (B1 office/light industrial of which no more than 4300m² to be B1 office), up to 100 holiday lodges/camping pitches, hotel, public open space, landscaping, visitor parking, new access road and associated infrastructure'* (S.17/0798/OUT). This includes employment land provision. However, the application is for a wider application and is primarily residential-led. Therefore, the deliverability of the employment land is questioned.
- 5.18 Despite the above, site allocation SA5 is not considered suitable for new B Class employment land and therefore it is not considered to be deliverable during the LP period.
- 5.19 In this context, it is considered that the site should be removed from the employment land availability.

SHARPNESS SA5A

5.20 The site benefits for planning permission for the erection of 2 no. buildings for light industrial/storage and distribution purposes (Use Classes B1 and B8) and associated works, as extension to Severn Distribution Park (application reference S.13/2153/OUT). Howard Tenens currently run the existing Severn Distribution Park and this represents a logical extension to their existing activities.

5.21 In this context, it is considered that the entire site is considered available and deliverable (9.8ha) within the plan period, as set out in Table 5a.

ADOPTED LOCAL PLAN ALLOCATIONS: SUMMARY

5.22 Most of the allocated sites benefit from a planning permission/application and are considered deliverable. Those sites are included within the commitments assessment (Table 3b), included above.

5.23 In light of the above, it is considered that Table 5a should be amended to remove the additional land at West of Stonehouse to reflect the application on the site, as well as land at Sharpness, as follows:

Site	With permission – not completed (ha)	Area completed (ha)	Area remaining (ha)	Total Area (ha)	HPP Area Remaining (ha)
SA2 West of Stonehouse	9.3	0	0.7	10.0	0
SA3 North East Cam	10.7	0	0.7	11.4	0.7
SA4a Quedgeley East	0	0	13.0	13.0	13.0
SA5 Sharpness	0	0	7.0	7.0	0
SA5a South of Severn Distribution Park	9.8	0	0	9.8	0
Total	29.80	0	21.40	51.20	13.7

6.0 Conclusion on Employment Land Supply

- 6.1 Table 1 of the 2017 ELA sets out the employment land supply position in the District as of March 2017.
- 6.2 This has been updated reflect the current position; providing greater scrutiny of the sites included within the Council's supply provides a more accurate picture of the sites that are deliverable for employment purposes.

	SDC Assessment	HPP Assessment
Completions (B class uses only)	24.8	18.75
Commitments (B class uses only)	44.31	38.3
Local Plan Allocations without permission	21.40	13.7
Gross Land Supply	90.51	70.75
Losses (Actual)	25.85	25.85
Losses (Potential)	0	17.64
Net land supply	64.66	27.26
Local Plan Requirement	58	58
Total Surplus/Shortfall	+6.66	-30.74

- 6.3 The above demonstrates that the Council has a significant shortfall against the Local Plan Requirement.
- 6.4 Even if a different approach were to be taken, there still would be a shortfall of employment land in the District. For example, if an optimistic approach was to be taken in respect of Sharpness and the 7ha included, the shortfall would still be 23.74 ha.
- 6.5 In conclusion, after careful scrutiny of the employment land supply within the District, the strategic requirement for 58ha of net additional employment land to be provided between the period 2006-2031, cannot be met with the adopted development strategy.
- 6.6 It is therefore evident that there remains a need to provide new employment sites in the District. More specifically there remains an urgent need to provide high quality employment land to address the employment issues identified in the Local Plan.



Legend

- Ecotricity Land Holdings
- Proposed road dualling
- Employment and Parking
- Sports Complex
- Nature Conservation Area

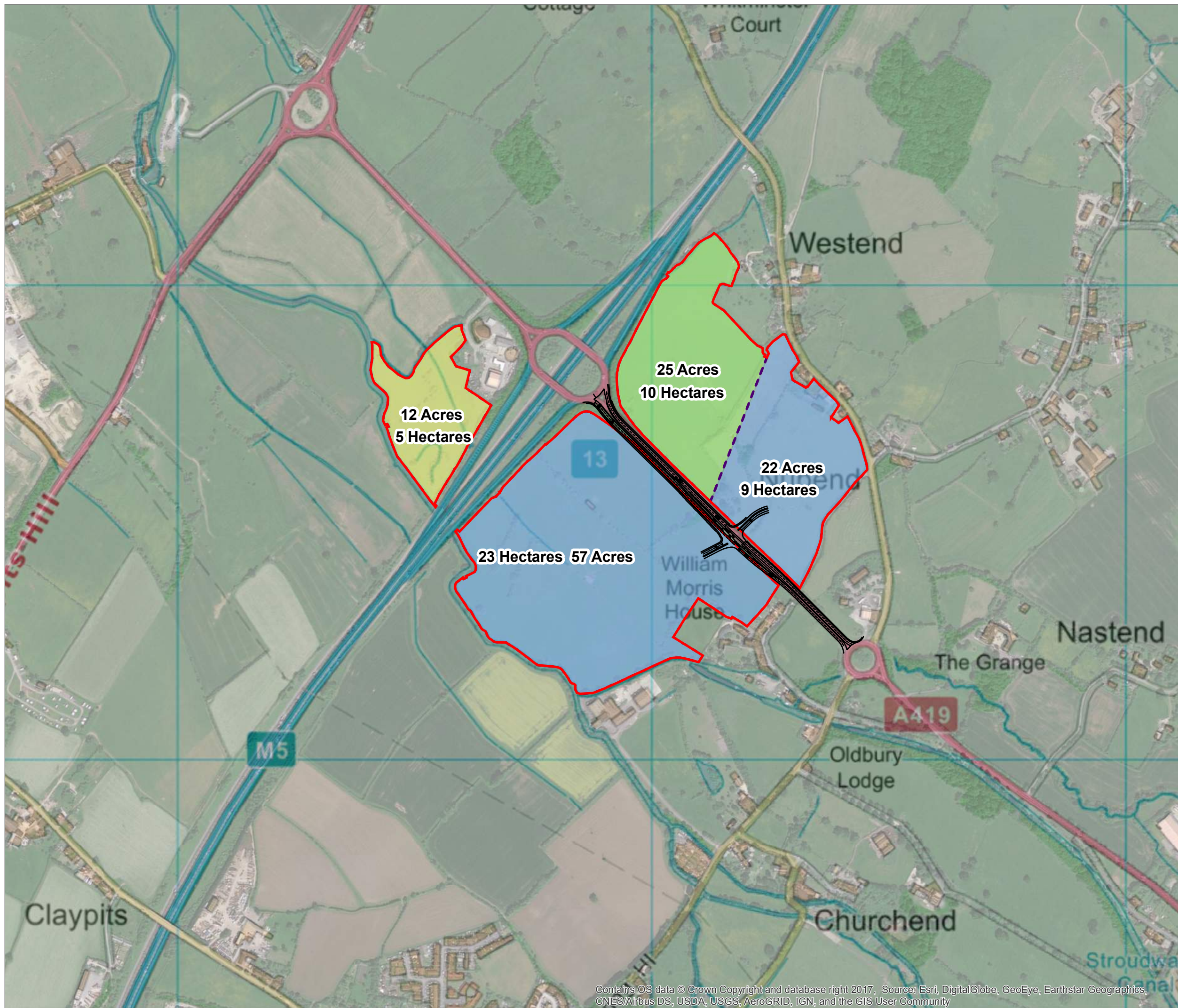
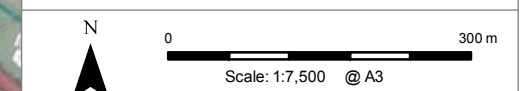


Figure:1
Title: Outline Concept Plan



Drawn by: <i>MW</i>	Checked by:	Approved by:
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Eco Park

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