
Stroud Local Plan Review Draft for Consultation

Representation by Smith's (Gloucester) Limited January 2020

Background

1. Smith's (Gloucester) Limited is a successful local family business established over 35 years ago and is a major employer in Stroud, employing nearly 500 people regionally, with a large proportion of them based in the District. The company is growing and anticipates that in the next couple of years the number employed will increase by a further 100. This document is submitted as Smith's representation to the Stroud Local Plan Review Draft for Consultation.

Overall Comment

2. Smith's operates a number of sites in the District and is keen to ensure that the growth of its business is not compromised, but supported by planning policies, in line with the NPPF which looks to planning policies to support economic growth and take into account local business needs. Having reviewed the draft plan, Smiths remain concerned that as an existing business and major local employer, it does not provide a positive approach for the continuing growth of its business.

General Comments on Consultation

3. Whilst the format of the plan is similar to previous versions some of the changes are not readily apparent¹ with unhelpful cross referencing to other documents and lack of a dedicated proposals plan for this version. The document makes reference on a number of occasions to 'further refinement and rationalisation' and 'policies not being accompanied by supporting text' which is unhelpful when reviewing the document. In reviewing the accompanying consultation report on the Emerging Strategy this feels slightly misleading, noting paragraph 2.5 listing the companies who made representations, Smiths were not listed despite the fact they did make representations².

¹ There are errors in paragraph numbering in the document.

² This may be on the basis that an agent submitted representations on their behalf but it is misleading to identify and separate comments in this manner.

Comments

4. Smith's are pleased to note that the strategic objective referring to the economy and jobs does now explicitly supports existing businesses, however, this should be strengthened further and clarified in the policies themselves, even where the policies are unchanged from the current plan.
5. Smith's operate from several sites in the district and their two main sites, which are long established and provide a substantial level of employment, are not in or immediately adjacent to existing settlement boundaries nor are they on sites which are identified as Key Employment sites under policy EI1. Any expansion proposals would therefore be considered in the light of policies CP2, CP11 and CP15. Policies CP2 and CP11 focus on employment development on new employment sites or within settlement boundaries and CP15 relates to development in the countryside which only focuses on rural employment. Hence Smiths do not see how this supports the development of their existing business locations and consider others in the district will be in a similar position.
6. Smiths' representation in January 2019 referred to the two SALA sites which abut their operations at their Eastington and Moreton Valence sites. These have no planning constraints such as conservation, landscape or heritage designations. Smiths are disappointed that these sites are not included in the current document and maintain their earlier comments adding the additional comments below.
7. At Eastington the settlement came out well in terms of the Settlement Role and Function Study Up date 2018 with a good employment density, potential for good communications and few planning constraints around the settlement. Also the Eastington Neighbourhood Plan makes reference to support for the likes of Smiths yet there is nothing in the Plan allowing for/guiding employment expansion at Eastington.
8. Specifically turning to their Moreton Valence site (at the Old Airfield Industrial Estate), this is in the Severn Vale mini cluster area where Smiths made previous representations regarding the lack of any mention or provision for employment. Parts of this area are rural in nature but there is a very clear corridor along the A38 with many well-established businesses all contributing to the local economy. The Old Airfield Industrial Estate itself is not identified as a key employment site in policy EI1 although has supported various employment uses for many years.

9. Moreton Valence is immediately adjacent to the Gloucester Fringe mini cluster area where there is substantial provision for new employment sites. By comparison Javelin Park, located in the Gloucester Fringe, is only half a kilometre away and is very similar to Moreton Valence in characteristics in terms of constraints. The site is identified in Policy E11 as a protected key employment site. Additionally this latest version of the plan has further new provision for expansion at this site, although the basis for it's inclusion is unclear. This feels like a substantial inconsistency to Smiths and one which will prejudice their future development.