

Wednesday 22nd April 2020

Planning Department
Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB

Dear Sir/Madam,

Representation to Stroud District Local Plan Review: Draft Plan for Consultation
November 2019

Thank you for the opportunity to provide comments on the Stroud District Local Plan Review Draft Plan for Consultation. This letter provides comments on the proposed economic strategy identified in the Draft Plan on behalf of GFirst LEP's Construction and Infrastructure Business Group.

We have read the Plan together with the emerging strategy and economic policies.

Stroud District benefits from a very strong economy and in recent years has been home to a selection of world class companies and has developed a range of innovative technologies. Historically, the economy has been centred largely on manufacturing businesses. However, it is now considered that there is a need to provide for qualitative improvements in the existing employment stock as well as diversifying the types of employment available in the District.

We understand that Stroud District has previously experienced a considerable amount of out-commuting, with younger and more skilled workers leaving the District or travelling greater distances to find more skilled employment opportunities in centres such as Bristol, Birmingham and Cheltenham. Part of the problem with the current employment base is that it is centred on low skilled jobs, and with few, quality employment sites to attract and maintain knowledge intensive businesses and key staff. The District does however have a reputation for advanced technology and creative skills, and it is considered that this needs to be promoted and expanded during the next Local Plan period. Stroud does not have a strong retail base and therefore should not rely upon this source of employment.

GFirst LEP's Construction and Infrastructure Business Group therefore believe that the Local Plan needs to target additional employment sites that are attractive and accessible, to help

retain good quality local businesses within the District and to help diversify the type of employment available. Attracting the right type of businesses and growing knowledge intensive businesses within the District should help to strengthen local employment, reduce the amount of out-commuting and encourage young people to remain in Gloucestershire.

New sites in the Local Plan Review should therefore be attractive and in accessible locations to be appealing to a range of different business types, but specifically targeting the growth of knowledge intensive businesses.

We understand that the economic strategy of the Local Plan Review has been built upon providing a supply of additional employment land based on past trends which equates to approximately 48.7ha. When current commitments and losses are included within this supply, the residual employment requirement up to 2040 is approximately 14.4ha. However, recognising current employment trends and commuting imbalances as well as providing a more proactive '*policy-on*' approach to the local economy, the Local Plan Review is currently looking to provide an additional 61ha of new employment land on new sites across the District. In broad terms, GFirst LEP's Construction and Infrastructure Business Group supports this approach and the proposed distribution of new sites. It is considered that these new sites will significantly and positively strengthen the local economy, providing an attractive range of accessible new employment opportunities within the District.

Employment Strategy

Page 39 of the Local Plan Review sets out the employment strategy that will be delivered and in summary this involves:

1. Economic growth and additional jobs on and adjacent to existing high value employment sites within the M5/A38/rail corridor;
2. A variety of new employment sites to meet the specific requirements of different sectors with particular support for green technology hubs;
3. Support for affordable, low cost sites and premises;
4. Foster on-going employment and education links;
5. New employment located next to new housing to create sustainable communities and reduce commuting;
6. Support for faster roll out of broadband;
7. Support for farm diversification proposals;
8. A flexible approach towards encouraging more tourism businesses; and re-generation of under-utilised or low value employment sites.

The plan is also under-pinned by a new Core Policy DCP1, that seeks for the District to become carbon neutral by 2030. This objective and the employment strategy of the Local Plan is supported by the LEP.

New Employment Sites

We are mindful that plan-makers will need to assess a range of different employment sites from individual small-scale sites to opportunities as part of large-scale developments such as extensions to existing settlements and new settlements where appropriate. Plan-makers will need to assess the suitability, availability and achievability of sites, including whether sites are economically viable. This will enable sound judgements to be made on whether a site can be considered deliverable within the next five years, or developable over a longer period.

We note that the employment strategy of the Draft Local Plan aims to provide 8 new employment sites that will in total provide an additional 61ha of new employment land in the District. The new employment sites are listed in table 5 of the Local Plan and included in Core Policy CP2 of the Plan and include:

<i>Strategic sites</i>	<i>Hectares at each</i>
1. Quedgeley East Extension	5 ha
2. Javelin Park	9 ha
3. Sharpness Docks	7 ha
4. Sharpness	10 ha
5. Stonehouse North West	5 ha
6. Stonehouse Eco-Park (M5 J13)	10 ha
7. Wisloe	5 ha
8. Renishaw New Mills	10 ha
Total:	61 ha

The Local Plan is considered to provide a good range and distribution of employment sites across the District that should help diversify the employment needs of the District and meet future employment trends. Clearly each site will need to be positively tested through the consultation and examination process to ensure that it is deliverable during the local plan period.

We are also mindful that future planning policies should ensure a flexible approach for business park sites. We are aware of recent planning appeal decisions in Gloucestershire

including at Plot G, Stonehouse Business Park, Sperry Way, Stonehouse, GL10 3UT (APP/C1625/W/18/3214940) and Land at Grovefield Way, The Reddings, Cheltenham GL51 6RF (APP/B1605/W/18/3200395). In these appeals, ancillary uses were permitted on business park sites as it was considered that it would make them more attractive to end users. GFirst LEP's Construction and Infrastructure Business Group agrees with this approach and considers that some ancillary uses on business park sites can help to make them more attractive to employers and employees. However, it is considered that such uses should not comprise of more than 20% of the primary employment uses in site. As such, we consider that the Local Plan should explicitly state that ancillary uses on the emerging business park sites in the Local Plan will be acceptable provided that they do not exceed 20% of the primary employment use on site.

We trust these representations are of assistance, but please do not hesitate to contact us should you have any further questions.

Yours faithfully,

The Construction and Infrastructure Business Group

