

PF/JH/5449

28 November 2018

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

Sent via email only

Dear sir/madam

Stroud Local Plan Review: Renishaw Expansion

This representation has been prepared by Hunter Page Planning/Ridge (HPP) on behalf of Renishaw PLC, in relation to the Stroud District Local Plan Review. The Local Plan review seeks to ensure that the housing, employment, retail and community needs are met up until 2031. Renishaw PLC are a major local employer as recognised by Stroud District Council within the Local Plan. However, in order to secure the long-term future of Renishaw within the District and within the County, it is considered that additional expansion land adjoining the New Mill's complex should be safeguarded over the forthcoming Local Plan period and it is therefore requested that additional land is allocated within the Local Plan Review as one of the potential options and outcomes of the Plan in order to enable this to occur.

Renishaw PLC

Renishaw PLC is one of the world's leading engineering and scientific technology companies, with expertise in precision measurement and healthcare. The company supplies products and services used in applications as diverse as jet engine and wind turbine manufacture, through to dentistry and brain surgery. It is also a world leader in the field of additive manufacturing (also referred to as metal 3D printing), where it is the only UK business that designs and makes industrial machines which 'print' parts from metal powder.

The Renishaw Group currently has more than 70 offices in 35 countries, with over 4,000 employees worldwide. Around 2,800 people are employed within the UK where the company carries out the majority of its research and development and its manufacturing.

The company's origins and international headquarters is at New Mills, near Wotton-under-Edge in Stroud. Whilst there are additional offices around the UK, it has a strong presence within Stroud District, and this is where the primary research and development for the company takes place. Renishaw is noted within the adopted Local Plan at Paragraph 3.82 to be *'a major employer, based just outside the village of Kingswood.'* Its importance locally is therefore recognised by the District Council, as well as Gfirst LEP within the 'Strategic Economic Plan' which specifically references Renishaw when referring to the high levels of productivity in manufacturing within the County. It is therefore important that Stroud District Council takes into account the predicted growth and expansion of Renishaw whilst reviewing the Local Plan in order to ensure the company's needs and requirements are satisfactorily and sustainably accommodated within the County. This in turn will help support the continued



growth of the Gloucestershire economy which remains a priority both locally and nationally.

Planning Policy Context

National Planning Policy and Guidance

Section 3 of the new Framework provides guidance on Plan-making and sets out that the planning system should be genuinely plan-led and provide a positive vision for the future of each area. New plans should therefore be a framework for addressing economic, housing, social and environmental priorities. Plans should be prepared positively, in a way that is aspirational but deliverable and set out a pattern and scale of new development within their area.

With regards to economic development, Section 6 of the Framework requires that planning policies should create the conditions in which businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity, taking into account both local and business needs and wider opportunities for development.

The Framework looks for Planning Policies to set out a clear vision and strategy which positively and proactively encourages sustainable economic growth, as well as identifying strategic sites for local inward investment to meet the anticipated needs over the plan period. Such policies are required to be flexible enough to accommodate needs not necessarily anticipated in the plan that allows the plan to respond rapidly to changes in economic circumstances.

Importantly the NPPF also requires plans to address the specific locational requirements of different sectors, including making provision for clusters of networks of knowledge and data-driven, creative or high technology industries, at a variety of scales and in suitably accessible locations.

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).

Stroud District Local Plan

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.

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).

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. Based upon past take-up rates, the LP highlights there is a need to provide about 58 ha of additional employment (B1-B8) land (2006 to 2031).

Paragraph 2.43 states that within Stroud District, employment sites are mainly concentrated at a few key locations including Hardwicke, Stroud town centre, Stonehouse, the Stroud Valleys area, and to a lesser degree within Cam/Dursley and near Wotton-Under-Edge (where the Renishaw HQ is located). Paragraph 2.48 highlights that in order to stem out-commuting Stroud will need to attract more knowledge-based industries, enabling greater employment opportunities for the highly skilled and well qualified working population. This suggests a need for the District to both increase and diversify its employment base, in order to provide local job opportunities appropriate to the workforce and to help reduce the number of people travelling to towns and cities beyond the District for work.

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 increase the choice of sites available. It states that existing employment sites will be safeguarded unless new proposals are put forward that intensify the employment use of the site, supported by enabling development as set out in other policies in the Local Plan. It states that permission will be granted for industrial or business development, or for the expansion or intensification of existing industrial or business uses, provided that the proposals would:

1. Be of a type and scale of activity that does not harm the character, appearance or environment of the site or its surroundings or to the amenity of occupiers of nearby properties
2. Be readily accessible by public transport, bicycle and foot or contribute towards provision of new sustainable transport infrastructure to serve the area, in order to make the development accessible by those modes
3. Have a layout, access, parking, landscaping and facilities that are appropriate to the site and its surroundings
4. Use sustainable construction techniques and provide for renewable or low carbon energy sources in association with the proposed development
5. Enable provision of infrastructure in ways consistent with cutting carbon dioxide emissions and adapting to changes in climate (including SuDS and green infrastructure)
6. Demonstrate how the principles of industrial symbiosis have been taken into account.

Delivery Policy EI1 sets out Key Employment Sites in the District, to be retained for B Class Uses. These include: EK17 Renishaw New Mills, EK18 Renishaw Charfield Works and EK37 Renishaw Old Town.

Delivery Policy EI4 states that on existing employment sites in the countryside, the extension of buildings and the provision of new buildings, including infilling between existing buildings, will be acceptable provided that:

1. The proposal facilitates the retention or growth of local employment opportunity
2. The proposal would not cause an unacceptable visual impact on the local character in terms of its siting, scale, materials or site coverage
3. There are no suitable alternative buildings or sites that can be used adjacent to the site or locality
4. The proposal can avoid harm to local amenities and adjoining land uses
5. The proposal would not generate significant traffic movement and volume that would lead to unacceptable environmental impacts or detriment to road safety.

Kingswood Neighbourhood Plan

The Kingswood Neighbourhood Development Plan (NDP) was made in May 2017 and is now part of the Development Plan for the area. The NDP highlights that Renishaw were heavily involved in the preparation of the NDP.

The NDP highlights that Kingswood is the home of a major employer within the district, Renishaw plc, which has 1200 employees based at two sites within the parish. It acknowledges that as an employer, Renishaw PLC has almost as many employees as Kingswood has residents.

The key policy of relevance is Policy BE1 which relates to the protection and enhancement of employment opportunities, and states that *'proposals which help to generate employment and develop business through the extension, conversion and replacement of existing buildings or provision of new buildings within existing employment sites or at locations in accordance with the other policies of the plan will be supported, provided that they avoid significant adverse effects in terms of:*

- *Impact on neighbouring properties, or the locality in general in terms of noise, fumes, odour or other nuisances;*
- *Impact on local and rural character in terms of scale, visual impact and nature of operations; and*
- *Traffic generation, congestion and other traffic related nuisance.'*

Need for Additional Employment Land

As set out above, the Local Plan identifies a need to provide between 6,800 and 12,500 net new jobs between 2006 and 2031 equating to approximately 58ha of additional employment land. The Local Plan Review seeks to reassess the delivery of these proposed sites and assess the growth in the local economy over an extended plan period up to 2040. It is therefore apparent that additional strategic growth will be required in the District for the additional 9 year period, that will be able to meet the needs of local businesses as well as make up for the non-delivery and losses of other employment sites.

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. In terms of employment sites, the Local Plan identifies strategic employment sites at:

- Quedgeley East: 13ha
- North East Cam: 12ha
- Sharpness: 17ha

- Stroud Valleys Intensification
- West of Stonehouse: 10ha

Whilst the Local Plan has attempted to allocate a range of new employment sites, it is considered that these sites are not necessarily sufficient or in the right location, to meet the business needs of the south of the District during the latter part of the plan period, and are also considered insufficient to meet the requirements of Renishaw and associated companies ongoing future in Gloucestershire up to 2040. 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 sets out the completions, commitments and losses of employment land in the District as well as the potential delivery from the above allocations.

An assessment of this employment land supply would suggest that there have been greater employment land losses than have previously been accounted for and fewer new employment sites coming forward. Upon review, it is considered that there will be a significant shortfall against the Local Plan requirement (approximately 30ha below the requirement), and therefore there is a need to provide more employment land within the District that will address the growth of local businesses and address modern business needs.

Irrespective of this, it is also apparent that these growth areas do not allow for sufficient growth to the south of the District and equally, will not allow Renishaw to grow in situ which is an important criterion in their business development within Gloucestershire.

Future Growth Strategy

CP11 highlights that new employment development will be provided through a range of sites and premises across the District. Strategic employment sites will be allocated, mixed use developments encouraged and the expansion of existing businesses and rural diversification supported. There is the clear recognition that the expansion of existing businesses should be supported. Therefore, the allocation of further land at Renishaw would help to meet the needs of Renishaw, in a manner consistent with the adopted development strategy, whilst also meeting their predicted future growth and overall shortfall of employment land identified above.

The Local Plan also highlights that in order to stem out-commuting Stroud will need to attract more knowledge-based industries, enabling greater employment opportunities for the highly skilled and well qualified working population. This suggests a need for the District to both increase and diversify its employment base, in order to provide local job opportunities appropriate to the workforce and to help reduce the number of people travelling to towns and cities beyond the District for work.

Renishaw is a unique employer, providing a range of highly skilled jobs within the local area. The emphasis on Research and Development at New Mills means that jobs are available for graduates all the way through to senior engineers and management. Renishaw therefore attracts a highly skilled workforce in its product development supporting the growth of a key knowledge based industry within the County and driving innovation to help secure stronger productivity. The company has created a resilient and innovative business that in turn has created prosperity within the County. Care has been taken during the company's growth to create new and attractive premises set within a high quality natural environment. This has enabled their past expansion to be undertaken sympathetically whilst growing the primary area of the business. Where the growth of other modern business in the district has stalled, Renishaw is therefore proud to be a principal employer of skilled staff in the region and a leader in innovation nationally. The successive growth of Renishaw in the past has therefore created sustainable employment growth in Stroud consistent with the overall objectives of the Local Plan.

Expansion Land

Renishaw is aware that their new product development and success within the market place will lead to future growth requirements during the Local Plan Review period. Equally associated business growth will mean that additional land will be required over the plan period. This representation therefore wishes to bring this to the attention of the Local Planning Authority so that additional land can be identified now to enable the expansion of the company in due course. Renishaw is mindful that the principle of growth needs to be established during this Review process in order to support a plan led system and therefore use this representation to highlight the anticipated growth and general area where growth could be sustainably accommodated.

The existing New Mills Site consists of the company's Headquarters which has a number of large buildings used by the company, with the main 'New Mill' building being Grade II* Listed. This site is outside of a defined settlement boundary but the majority of the site is covered by Policy EI7 (which sets out Key Employment Sites) and is allocated as site EK17 Renishaw New Mills.

In terms of planning history, an application was granted in 2000 for the erection of buildings for the expansion of Renishaw's New Mills operation and creation of new estate road, parking and formation of a lake. Reserved Matters were approved in 2003, and the link road was subsequently built. In 2011, Renishaw undertook a review of the consent and submitted a revised application (S.11/1941/FUL) which consolidated the main growth into a single building (Renishaw Innovation Centre – 'RIC' building). This building has been built (with the exception of the last phase of the building which will be finished soon). As part of this application it was confirmed by Officers that the 2000/2003 consent was extant.

The current boundary of the EK17 site is set out below. As part of the Local Plan Review, it is recommended that this boundary is extended to reflect the above applications. In this respect, it is suggested that the boundary reflects the boundary set by the estate road.



In terms of further expansion land, it is considered that an additional 10ha of new employment land is required as shown on the attached plan. This represents a logical expansion of the existing site in a location where the commercial activities can be consolidated and kept in a single location. The precise constraints in and around the land are currently being investigated and will be used to support the company's expansion on this site.

The proposed expansion area is the site to the west of the existing Headquarters and is predominantly greenfield land, with Lower Barnes Farm at the centre. It would be readily accessible from the existing

estate road, or alternatively, via the existing roundabout. This site is not situated within any landscape or ecological designations, although there are a number of existing PRow which cross the site. A very small parcel of the site around Dyers Brook is at risk of flooding and any development would need to be mindful of this. Furthermore, Lower Barnes Farmhouse is Grade II listed which would need to be given consideration. However, there are no significant physical constraints that would limit development of the site.

The site is un-used and in single ownership. There are no legal or ownership problems or significant constraints which could limit development. It can, therefore, be considered to be available and deliverable now.

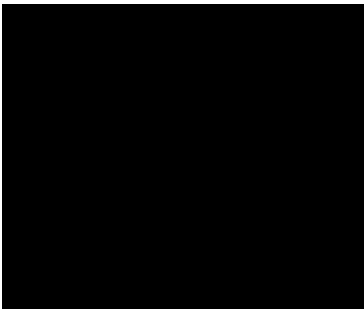
As identified within this letter, there is a clear requirement for high-quality employment land for knowledge-based industries across the District and this development could assist in helping to meet this shortfall. It will also meet the direct needs of Renishaw which requires additional expansion land during the Local Plan Review period. As such, development of the site can be considered achievable.

In terms of the deliverability of this site in contributing towards the employment needs of Renishaw and the District, this letter demonstrates the site's suitability, availability and achievability for employment development. In this context, the site is considered deliverable for employment development which is in line with the adopted Growth Strategy which supports the growth of existing businesses.

I trust this information will be taken into account; if any further information is required in relation to the above, please do not hesitate to get in touch.

We would be grateful if you would keep us informed of progress as the planned growth of the company is critical to its future within the district.

Yours faithfully



Hunter Page Planning

