



# Stroud Local Plan Review Examination



Hearing Statement Matter 4  
Employment Needs and Requirement



**Boyer**

## Report Control

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# 1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Eastington Parish Council (EPC) in response to the Inspectors' Matters, Issues and Questions relating to the Stroud Local Plan Examination Update examination.
- 1.2 This Hearing Statement relates to Matter 4 - Employment Needs and Requirement. It is to be read in conjunction with the representations previously submitted throughout the plan making process.
- 1.3 By way of background, in April 2022 EPC objected to the revised Outline Planning Application S.22/0206/OUT for the proposed Eco-Park development on land at M5, Junction 13, West of Stonehouse, Eastington, Gloucestershire. The Outline application remains pending determination.
- 1.4 Overall EPC have concerns relating to the proposed Employment Needs and Requirement outlined in the Local Plan Review. EPC consider that the evidence is based on scenarios forecast prior to the COVID-19 pandemic and therefore the evidence base for employment needs to be revisited before the evidence can be considered justified and the Plan to be found sound.

## 2. MATTER 4: EMPLOYMENT NEED AND REQUIREMENT

2.1 On behalf of Eastington Parish Council, we provide a response to the Inspectors' Matters and Questions below.

**Issue 4 – Are the identified employment needs supported by robust and credible evidence, justified and consistent with national policy? Is the Plan's proposal to accommodate 79 ha of employment land soundly based?**

*Q.1: Were the scenarios used in the ENA based on robust evidence and are the economic growth assumptions justified? Is there reasonable alignment with the housing need assessment?*

2.2 EPC consider that the scenarios used in the Gloucestershire Economic Needs Assessment (2020) (ENA) (EB29) are out-dated and are therefore no longer based on credible evidence. EPC have fundamental concerns regarding the robustness of the economic growth assumptions and the Plan is not therefore justified against NPPF paragraph 35(b) for the following reasons:

1. The ENA (EB29) was published in July 2020 and whilst the assessment does consider the implications of Brexit and COVID-19, EPC draws attention to the fact the assessment recognises that forecasting future economic remains highly uncertain and is due to a wide range of factors.
2. Since the publication of the EB29 the UK has been subject to an economic downturn with the UK likely to enter recession this year. As a result, EPC question whether the economic assumptions used remain valid. It is considered that the employment need and requirement should be revisited before the Plan's proposal to accommodate 79 ha of employment land can be considered sound.
3. Whilst it is recognised that the labour supply approach scenarios look at alignment between future housing and employment land needs and calculates the employment needs resulting on the population growth as set out in the Gloucestershire Housing Needs Assessment (EB10), EPC note that the Standard Method for local housing is based on figures from 2019 which have since been updated. Therefore, the alignment between economic growth and housing need is not up to date and needs to be revised before the evidence can be considered robust.

*Q.2: Is use of the higher needs scenarios justified? Have clear reasons been given as to why lower economic needs figures would not be appropriate?*

2.3 As outlined above, EPC do not consider the higher needs scenarios are justified due to the following reasons:

1. There has been a material change in the economic circumstances in terms of the UK being within a recession which has a knock-on consequence for economic need and requirements at a local level.
2. The Council are not justifying employment need on the most up to date evidence given the high uncertainty surrounding the economic forecasts undertaken at the time EB29 was being produced.
3. The long-term effects of the pandemic have seen the demand for office space falling drastically, with many existing office units remaining redundant and/or largely underutilised. EPC are also aware the employment uses proposed as part of the West of Stonehouse urban extension are yet to be delivered which further demonstrate how economic circumstances are directly being affected.

2.4 The Council do not set out clear reasons why the lower economic need scenarios identified in the evidence base [EB29, Employment Topic Paper (EB7) or within the Employment Land Review (EB30)] would not be appropriate. On this basis, EPC do not consider the employment needs for the District are robust or can be considered sound in line with NPPF, paragraph 35.

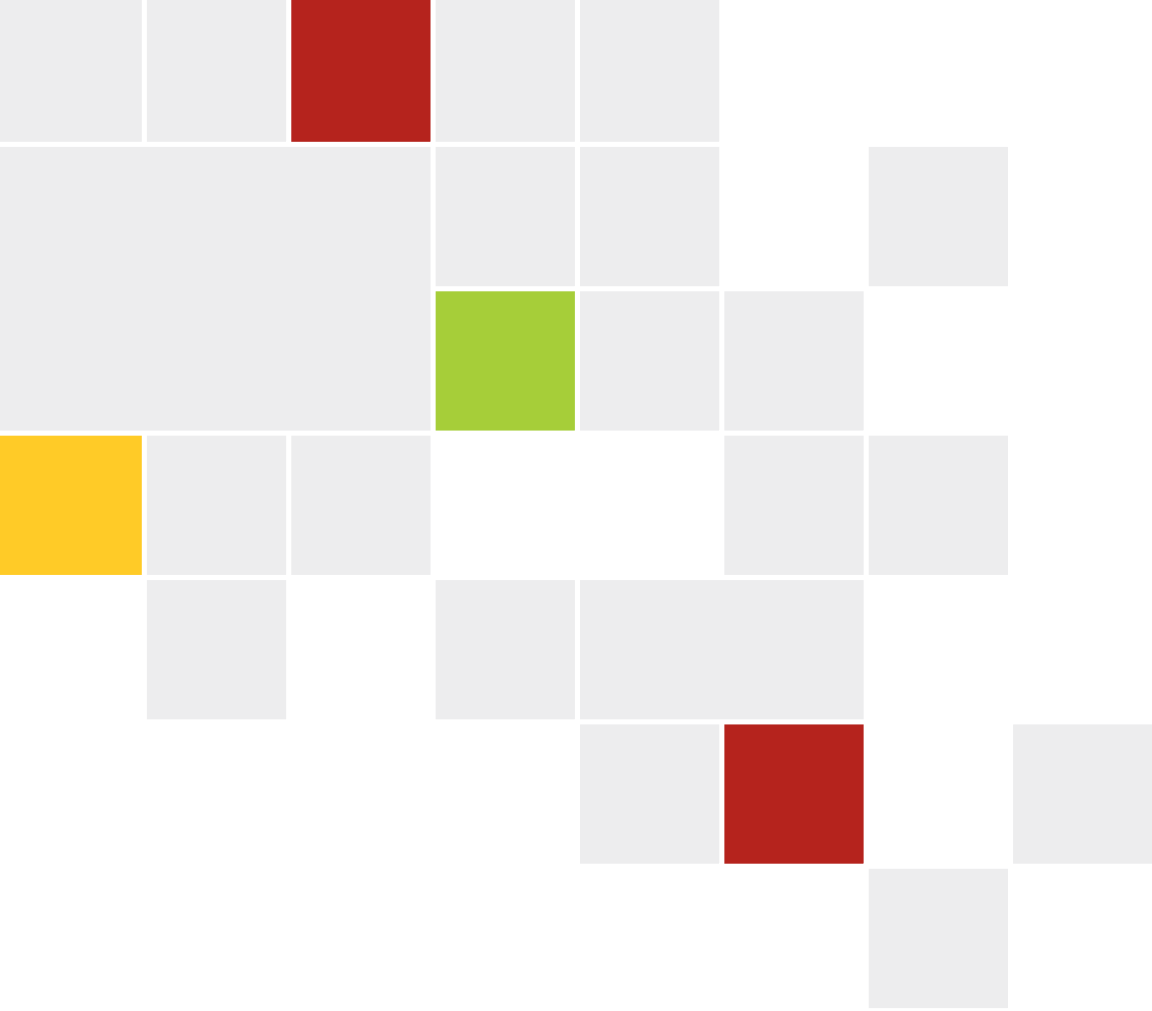
*Q.5: The minimum employment land requirement range of 50.9 to 60.3 ha does not appear to be set out in policy. Instead Core Policy CP2 states that 'Stroud District will accommodate....at least 79 hectares of additional employment land to meet the needs of the District for the period 2020-2040....', which is above the minimum requirement.*

*This higher figure appears to be based on the proposed new employment land supply comprising eight strategic development site allocations. Whilst our questions on these site allocations and overall employment land supply are set out under later matters, is the provision of a higher level of new employment land than is necessary to meet the minimum requirement justified by robust evidence? Can the Council clarify the percentage of additional employment land being proposed above the identified requirement and explain the reasons for this?*

- 2.5 EPC believe that the overallocation of new employment land by circa 19ha is not justified with robust evidence. Although the Gloucestershire Economic Needs Assessment (2020) (ENA) (EB29) recommended to meet the two highest scenarios, supporting a net increase in employment land of between 62 – 72ha, the justification from The Plan (CD1) states that the overallocation is to ensure any further losses of employment land that may increase due to the new flexibility in changes of use as a result of the E Class. No recommendations have been made to overallocated employment land, only meet the requirement within the highest scenario.
- 2.6 Paragraph 2.6.11 of The Plan (CD1) states that Stroud District has **above average** levels of self-employment and home working and recognises a demand for smaller, flexible work environments that has accelerated due to Covid-19. This conflicts with the need for overallocation of employment land and does not justify the additional land allocated.
- 2.7 Furthermore, Core Policy CP2 within the Plan (CD1) does not justify the allocation of employment land, only stating that “*at least 12,600 additional dwellings and at least 79ha of additional employment land to meet the needs of the District*” will be accommodated. It must be noted within policy that the land is overallocated and the recommended allocation of employment land was between 62-62ha.
- 2.8 Within the Summary of Regulation 20 Responses to the Pre-submission Draft Plan (SLP-01b) Stroud Council stated on page 17 that “*The Plan (CD1) gives significant weight on the need to support economic growth and productivity. It allocates more employment land than recommended in the Gloucestershire Economic Needs Assessment (EB29) to allow for flexibility to accommodate needs not anticipated on the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances. This conforms to the requirements within paragraph 82 of the NPPF (July 2021).*”
- 2.9 Although paragraph 82(d) of the NPPF states that planning policies should “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”, the provision of an additional 19ha of employment land is not justified within the text provided by the **potential losses** and seems excessive in regards to potential circumstances throughout the plan period that may not happen.



- 2.10 The Employment Land Review (ELR) (EB30) states that the loss of employment land “*should be subject to active monitoring and feed into future Local Plan reviews*” (paragraph 7.14). If past trends continue and employment land loss increases due to changes of use introduced by the E Class, Eastington Parish Council support active monitoring of the Plan to ensure that employment land opportunities are not lost, however justification from Stroud Council regarding the 19ha overallocation must be given and the potential impacts of overallocation must be considered.



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