Rubicon Planning

GLOUCESTER CITY PLAN 2011- 2031 EXAMINATION HEARINGS

Matter 10: The delivery of the plan.

For Tritax Symmetry Limited

Respondent Id: 29165313

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Matter 10: The delivery of the plan.

- 1.1 This Matter 13 Hearing Statement has been prepared on behalf of our client Tritax Symmetry Limited for Gloucester District Council's ('the Council') Local Plan 2031 ('the Plan') Examination in Public. Tritax Symmetry have a promotion agreement for land known as Symmetry Park, Gloucester Phase 1 and Phase 2. The Statement should be read in conjunction with previous consultation responses submitted to the Council on behalf of Tritax Symmetry in relation to this Local Plan (some of which are referred to in this Statement).
- Whether the following proposed site allocations, are justified, based on up-todate evidence, effective, and consistent with national policy?
- 1.3 In respect of Matter 10 Tritax Symmetry Limited (TSL) wish to comment of the Council's allocation of employment land and how the quantum of identified employment land fails to provide the level of need identified in the JCS. TSL have commented on the generality of the Council's approach to the DtC in respect of this matter and of overall supply.
- 1.4 Taking each of the following proposed employment site allocations individually:
 - SA07 Lynton Fields, Land East of Waterwells Business Park.
- 1.5 The landowner has stated the site is not available for employment use. There is a reasonable prospect given the residential supply issues faced by Gloucester City that this site will come forward for residential use.
 - "In 17 years the site has not come forward for employment use. A residential allocation would be a justified alternative use due to the site now sitting in a predominantly residential area and has properties in close proximity. It would not be unreasonable to consider an alternative residential allocation for this land. Moreover, in 35(c) a local plan must be 'effective' in order to be sound. Given that this land is not being marketed for employment use, and the owner has no intention of selling it for such a use, it is undeliverable as an employment site and therefore ineffective." Representations to GLP
- 1.6 Deliverable B Class Employment 0ha
 - SA08 Kings Quarter
- 1.7 Planning permission 18/01454/FUL is for a mixed-use town centre redevelopment scheme with a maximum B class employment space of 3,500sqm of B1 offices.
- 1.8 Deliverable B Class Employment 0.35ha
 - SA09 Former Quayside House, Blackfriars
- 1.9 This is a former County Council office owned by the County Council redevelopment is under way (19/0045/GLR3MJ) to provide for a Primary Care Hub comprising two General Practitioner (GP) surgeries serving around 17,689 patients, a pharmacy, up to 2492m2 of open plan office space and ground floor parking. No new B class employment will be created and represents a net loss in employment floorspace.
- 1.10 The allocated site includes the retained car park and other retained office and County Council buildings.
- 1.11 Deliverable B Class Employment 0ha
 - SA10 Former Fleece Hotel and Longsmith Car Park
- 1.12 The site is owned by the City Council and comprises for the most part a well used City Centre multi-storey car park and various important listed buildings. Proposals in the media in 2019 referred to refurbishment of the hotel and conversion of part of the car park into a conference centre. A City Design Statement in 2012 called for Niche retail, offices, retail frontage, building on Bull Lane retail offer, active ground floor uses, residential upper floors, office, retail, restaurants, cafes, residential, hotel.
- 1.13 Deliverable B Class Employment 0ha

SA17 Land South of Triangle Park (Southern Railway Triangle)

- 1.14 This vacant site is currently used by Network Rail for operational purposes. It is constrained on two sides by railway tracks and the third side by the elevated Metz Way. Access between Morrison's and the railway and under Metz Way is extremely constrained. There are no applications for the redevelopment of this site.
- 1.15 Deliverable B Class Employment 4.2ha, however, given the constraints this is uncertain.

SA21 Part of West Quay, the Docks

- 1.16 Submissions by the land owners to the Local Plan are seeking allocation of the land for non B Class uses.
- 1.17 Deliverable B Class Employment 0ha

SA22 Part of Secunda Way

- 1.18 No applications submitted. Representation have been made to seek the reallocation of the Site as a housing allocation within the pre-submission draft of the Gloucester City Plan (GCP) and sets out evidence for why this change of allocation should be implemented.
- 1.19 Deliverable B Class Employment 0ha

Conclusion

- 1.20 Of the 14.6 ha said to be (para 4.14 GLP) allocated, either as 100% 'B Class' employment sites or as part of wider mixed-used schemes only a maximum of 4.5ha are suitable, available and deliverable for B Class employment use.
- 1.21 The GLP must acknowledge that employment land to meet objectively assessed need in the JCS over the plan period must be identified in neighbouring authority areas through the DtC and Statements of Common Ground.
- 1.22 The Key Diagram identifies Hunts Grove, which is within Stroud District, as a strategic allocation. This site is identified in the draft Stroud Local Plan as a development of 2500 dwellings to meet Gloucester's Need. The GLP similarly needs to identify land at M5 Junction 12 for employment development to meet Gloucester's need.